

Frequent Questions about Columbia River Basin Funding Assistance Program Requests for Applications

Last updated 4/10/2024 (updates are marked as “new” or “revised”)

Below are answers to frequent questions about EPA's [Science and Monitoring Request for Applications](#) for the [Columbia River Basin Restoration Funding Assistance Program](#).

Related information:

- [EPA Grants Home](#)
- [EPA Grants Management Training for Applicants and Recipients](#)

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Questions related to webinar materials/logistics:

1. Are the PowerPoint presentation slides from the webinar available for download?

Answer: Yes, the presentation slides used during all webinars will be available upon contacting ColumbiaRiverBasinGrant@epa.gov.

2. Will there be a recording of the webinar available for download?

Answer: The webinar will be recorded but will not be posted on the EPA website. If you would like to request a copy of the recording from the Science and Monitoring Competition webinar, please email ColumbiaRiverBasinGrant@epa.gov.

Questions related to project eligibility:

3. The RFA mentions categories as well as program priorities. Do projects need to address aspects of both lists?

Answer: EPA intends to only consider projects addressing the following categories listed in Clean Water Act § 123(b)(3)(C):

1. monitoring to evaluate trends
2. promoting citizen engagement or knowledge

For this grant competition, EPA also identified three additional priorities, shown below. Evaluation points (refer to Section V of the RFA) may be given to projects which address one or more of the following priorities, in addition to addressing one or more of the required project categories above.

1. Characterization and spatiotemporal trend analysis
2. Pathway Identification
3. Novel methods and approaches

Evaluation scores will not depend on the number of priorities addressed, but rather on the quality with which the priorities are addressed.

4. NEW Is it possible for a grantee to submit a scope of work that details multiple sub-projects, assuming the activities are eligible under the grant, under a single grant?

Answer: All applications will be evaluated based on the Evaluation Criteria outlined in Section V.A. of the RFA, including how they address the FY2024 priorities as stated in Section I.C. Evaluation scores are contingent on one or more program priorities being addressed but scores will not depend on the number of priorities addressed, rather on the quality with which the priorities are addressed. In short, yes, a single application could address multiple priorities and include multiple activities.

5. Are there priority toxics to be addressed under this RFA?

Answer: EPA recognizes there are a wide range of toxic concerns throughout the Columbia River Basin related to urban runoff, legacy and emerging contaminants, agriculture, mining, and other sources or impacts. EPA hopes to receive applications that address concerns specific to the localities and/or region where the project work will be based. As a result, the RFA does not identify specific priority toxic contaminants.

6. Do toxins include emerging chemicals of concern, such as pharmaceuticals?

Answer: Yes, pharmaceuticals may be considered toxins. Information on toxic contaminants covered by these priorities can be found on the website and include, but are not limited to, mercury, dichlorodiphenyltrichloroethane (DDT), polychlorinated biphenyls (PCBs), polybrominated diphenyl ethers (PBDEs), the Columbia River Toxics Reduction Working Group list of priority pollutants <https://www.epa.gov/columbiariver/prioritization-toxics-columbia-river> and the updated [Contaminants of Concern Framework](#), as well as the toxic pollutants listed by reference in Section 307(a)(1) of the Clean Water Act (see [40 CFR 401.15](#)).

For additional toxics resources please see:

- List of chemicals of concern in the Columbia River Basin (April 2020):
<https://www.epa.gov/sites/default/files/2020-03/documents/columbia-river-trwg-toxic-contaminants-reference-list.pdf>

- Reference list of toxic contaminants in the Columbia:
<https://www.epa.gov/columbiariver/columbia-river-basin-toxic-contaminants-reference-list> .
- List of CWA 303(d) listings for toxics also found on our website also identifying where TMDLs have or have not been done: <https://www.epa.gov/columbiariver/toxic-impaired-waterbodies-303d-lists-columbia-river-basin>
- [Lower Columbia River Estuary Plan - Comprehensive Conservation and Management Plan \(PDF\)](#) (2011)
- <https://www.estuarypartnership.org/our-work/monitoring/toxics>

7. Can a chemical like 6PPD that may not yet have human or aquatic life screening values be a focus of the monitoring effort?

Answer: Yes, there will be contaminants that do not have screening values or for which biological effects are not well understood. Monitoring efforts for these are eligible. Please see the RFA for more information.

8. The RFA states, “For purposes of this RFA, EPA will NOT fund activities that: Duplicate the work efforts, or authorities, of other EPA funded clean-up programs included but not limited to CERCLA, RCRA, and Brownfields.” For clarification, can these funds be used within an NPL site?

Answer: EPA cannot duplicate funding for activities that are covered by an existing EPA program (e.g., Superfund, RCRA, Brownfields). Monitoring for contaminants unrelated to the scope of the CERCLA, RCRA, or Brownfields actions on a site could be eligible. Also, monitoring beyond the boundaries of the site could be eligible. An applicant would need to explain how the efforts are not duplicative of other EPA funded efforts and why the activity is an appropriate use of Columbia River Basin Funds.

9. Can pollution or runoff containing fecal coliform bacteria, harmful algae blooms (HAB), or nutrients be considered a toxin for the purposes of the Columbia River Basin Restoration Grant Program RFA?

Answer: The Columbia River Basin Restoration Act Grant Program’s focus is on toxic contaminants. For purposes of this RFA, EPA will NOT fund activities that address conventional pollutants that result in toxic effects (e.g., cyanotoxins or harmful algal blooms) as a primary purpose. Monitoring or reductions of such pollutants may occur as a secondary co-benefit of projects funded through this program. For information on toxic contaminants, please see the resources provided above in Question #5.

10. Is there a focus on environmental justice and serving underserved and tribal communities?

Answer: While a focus on environmental justice and serving underserved and tribal communities is not an eligibility requirement it is considered during merit review. The RFA includes evaluation criteria and scoring points for how well the application addresses these factors. See Section I.C. of the RFA for more information.

All EPA programs have an overlay of addressing environmental justice and tribal communities consistent with Executive Order 13985: “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.”

11. Can EPA share examples of successful grant projects that were awarded in the FY19/20, FY21/22, BIL FY23 Columbia River Basin grant competitions?

Answer: More information on the grants that were awarded in recent Columbia River Basin grant competitions can be found on the [EPA website](#). In addition, EPA has published success story fact sheets describing the work being done by grantees to monitor, assess, and reduce toxics throughout the Basin. EPA has also developed a Story Map describing the Columbia River Basin Restoration Program which can be found at: [CRBRA Story Map](#).

12. Who is eligible to apply under this RFA?

Answer: Under this solicitation, only the following entities are eligible to apply for assistance, in accordance with 33 U.S.C. § 1275 and Assistance Listing 66.962: State governments, Tribal governments, regional water pollution control agencies and entities, local government entities, nongovernmental entities, or soil and water conservation districts. For more information see section III of the RFA.

13. NEW The word "applicant" appears to be used in a couple of different ways, in some cases meaning the principal investigator and in other cases meaning the institution at which that principal investigator is based. From the perspective of the rule that only one proposal can be submitted per applicant, does this mean one proposal per principal investigator or institution?

Answer: The “applicant” refers to the entity who is applying. In short, the applicant is the organization or institution, and not an individual person. As stated in the RFA, applicants can submit a total of one application under this solicitation. Eligible applicants include State governments, Tribal governments, regional water pollution control agencies and entities, local government entities, nongovernmental entities, or soil and water conservation districts, in accordance with 33 U.S.C. § 1275 and Assistance Listing 66.962. For more information see section III of the RFA.

14. Are current Columbia River Basin Restoration Grant Program (CRBRP) grantees, who received FY2019-20, FY2021-22, or BIL FY23 funding, eligible to apply under this RFA?

Answer: Under the Science and Monitoring RFA all current CRBRP grantees are eligible to apply.

[Questions related to grant application requirements:](#)

15. If an entity submits an application ahead of the RFA deadline, can they alter it?

Answer: Yes, an entity which has already submitted an application and wishes to revise it before the deadline, may do so. The entity can reapply thru grants.gov. If there is a way for the applicant to indicate that this is a revised version that would be helpful. After the RFA closes and all the applications are received, when EPA sees two applications from the same entity, we’ll reach out to verify which application is the final.

16. For proposals with multiple collaborators, do an applicant’s project partners need to be registered in the Unique Entity Identifier (UEI), and System for Award Management (SAM) in order to apply for a grant?

Answer: The grantee is required to be registered in SAM, and have a UEI, in order to apply for a grant. Prior to making subawards, the grantee must ensure each subrecipient has a UEI number. This is found in the Subaward Policy (<https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients>). Please see Appendix B of this RFA for more information.

17. If two eligible entities are applying, can they be co-applicants?

Answer: The application process requires one lead entity only and does not allow for co-applicants. However, in your workplan, you can designate other entities as partners or sub-awardees. The Columbia River Basin Restoration Program encourages partnerships. Please see [EPA's Subaward Policy](#) to understand the requirements and differences between subrecipients and contractors.

18. Can another federal agency be included as a subawardee?

Answer: Yes, an EPA grant recipient can enter into an agreement with a federal agency to perform services that will be paid for with grant funds provided the federal agency has statutory authority to retain and use the funds. Please reference Section 7.0 (b) of [EPA Subaward Policy](#) for further clarification.

19. If an applicant does not have an Indirect Cost Agreement, is there a standard maximum value the applicant can include for indirect costs in the budget?

Answer: If an applicant has never had an Indirect Cost Agreement, the applicant could use a de minimis rate of 10% for indirect costs in their proposed budget. For additional information, refer to the [Indirect Cost Guidance for Recipients of EPA Assistance Grants](#). Potential grant applicants can direct specific questions related to indirect cost agreements or other topics by sending an email to: ColumbiaRiverBasinGrant@epa.gov.

20. Does the 15-page narrative limit include the cover page or is the cover page considered separate from the 15-page work plan?

Answer: It depends on how you define cover page. Cover Page, as defined in Appendix A of the RFA, is included in the 15-page limit. The Project Narrative must not exceed a maximum of 15 single-spaced typewritten pages. Pages more than the 15-page limit will not be considered. Please see Appendix A in the RFA for more detail on what should be included in the Project Narrative.

21. Are references considered part of the 15-page limit?

Answer: No. Attachments are not included as part of the 15-page limit. Attachments include cost share commitment letters, partnership letters, and resumes (optional). Please see Appendix A of the RFA for more detail.

22. Would it be possible to provide an example of a letter of commitment for cost share? An example of a partnership letter?

Answer: Here is an example: [Example Letter of Commitment \(Brownfields - Northern Kentucky Health Department\) \(PDF\)](#). Please go to the [EPA Grants website](#) for more help.

23. The RFA's Past Performance Section asks for evidence of federally funded grants. Should we provide information about the individual applicant's (Principal Investigator's) federal grants, or a list of three federal grants from the entire entity (ideally EPA grants)?

Answer: The Past Performance section of the Project Narrative is used by EPA to evaluate an applicant's ability to successfully manage their proposed project based on their past grant performance. Prior EPA grants are preferred; however, any federally funded assistance agreements, grants, and cooperative agreements will fulfill the requirement. We are looking for both staff and organizational experience.

The applicant is the entity submitting the application. To see how we will evaluate Past Performance, please see Section V of the RFA.

Questions related to budget:

24. What does “incremental funding” mean?

Answer: Incremental funding is the partial funding of a contract, with additional funds anticipated to be provided at a later time. EPA will provide funding for multi-year projects in smaller increments awarded each year. See Section II.B. of the RFA for more information.

25. Can you clarify how to round budget numbers as expected for the SF-424A?

Answer: Round up or down to the nearest dollar when filling out all budget details, SF-424A, SF-424, and any other documents that include budget information. Do not use cents. Ensure all the totals add up correctly. This information is provided on www.grants.gov. Email ColumbiaRiverGrants@epa.gov for additional guidance.

26. Is there a mandatory cost-share/match requirement for these awards?

Answer: Projects under this RFA are subject to the following funding limitations and mandatory cost share requirements provided in CWA § 123(d)(2):

For non-Tribal applicants EPA will fund up to 75% of the cost of the overall project (i.e., applicants are responsible for cost-sharing at least 25% of the cost with non-federal funds).

For Tribal applicants EPA may fund up to 75% of the cost of the overall projects (i.e., Tribal applicants are responsible for cost-sharing at least 25% of the cost with either non-federal and/or federal funds). Tribal applicants who are selected under this competition can ask EPA to fully waive this match requirement.

27. I am a tribal member of a federally recognized Tribe. I work at a state/public university. Do I qualify for the match waiver, or does the waiver only apply if my institution is tribal?

Answer: It is the entity that is applying, not the individual, who is required to either provide match or request a waiver. Only tribal entities such as tribal governments and tribal organizations are eligible to request a match waiver. If a state/public university is submitting the application, it would not be eligible.

28. Does an applicant need to provide budget details for both the EPA and applicant cost share portions of the funding?

Answer: The budget, SF424, and SF424A must show the dollar amounts for both the federal portion being requested from EPA as well as the match. Both together constitute the total amount. Please see the example budget detail table and budget narrative in Appendix A of the RFA.

29. When can costs be incurred to be used as match? Does it have to be during the project period?

Answer: Except for eligible pre-award costs as defined in 2 CFR 200.458 and as authorized by 2 CFR 200.309 and 2 CFR 1500.8, no funds awarded under this RFA, or associated match, shall be used to cover expenses incurred prior to the project period. EPA will work closely with selected entities on appropriate project start dates.

30. When spending down on the 25% match, does this have to coincide with various stages of the project/budget period? Or could it be saved for the end of the budget period?

Answer: There is no drawdown frequency requirement in this program. An entity could wait until the project/budget period end to produce their match. The application will need to show where cost share is coming from (cost share letters, in-kind volunteer hours, etc.). Please keep in mind that if an awarded grant's lifespan is cut short for any reason, the lead entity is still responsible for providing match. In summary, the grant recipient is responsible and accountable for producing the records that validate that match was contributed.

31. If an entity has settled with a liable party and received mitigation funds which are now administered by the lead entity, could those funds be used to contribute as match?

Answer: Yes, as long as the applicant deems that those liable parties have complied with their mitigation requirements, the applicant would be eligible to use those funds as match. However, please note that non-tribal entities cannot use federal dollars as match. So as long as those mitigation funds are non-federal dollars, they would be eligible.

32. Can eligible entities contribute to the cost-share requirements if they are collaborators?

Answer: Yes. Any form of cost share must be included in the Budget Detail portion of the Work Plan, and the application must describe how and when the applicant will obtain the cost share and how the cost share funding will be used. Applicants may use their own funds or other sources for cost share if the standards of [2 CFR 200.306](#), are met. If the proposed cost share is to be provided by a named project partner, a letter of commitment is required. Only eligible and allowable costs may be used for cost share.

33. Can a Tribe acting under a sub-award on the project contribute cost share match using tribal funds that were awarded to the Tribe from federal sources?

Answer: Tribes are allowed, in our program per our guiding statute, to use federal dollars as match. However, the lead applicant, if not a tribe, will need to demonstrate the full 25% match.

34. Are tribal non-government organizations eligible for subawards (e.g. CRITFC)?

Answer: Any eligible entity can be an applicant or listed as a partner or subawardee. Federal entities, although not eligible to be an applicant, are allowed to be partners or subawardees. For more information on subawards please see <https://www.epa.gov/grants/epa-subaward-policy-additional-resources>.

35. For subawards, are there indirect cost restrictions?

Answer: It depends on the subawardee. Many may have limits on what they can charge depending on what they negotiate in their subaward agreement. If you have specific questions, please contact us directly. For more information on subawards please see <https://www.epa.gov/grants/epa-subaward-policy-additional-resources>.

36. NEW Are there limitations to the maximum indirect cost (IDC) chargeable on subawards (ex. \$25K)?

Answer: The recipient can charge Indirect Costs (IDC) based on their negotiated IDC rate agreement. Generally, the recipient can charge IDC on all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward, assuming each subaward is greater than \$25,000.

Subrecipients will have their own budget submitted to the recipient and will charge indirect costs based on their own negotiated IDC rate agreement, or, use the 10% de minimis. The recipient must ensure all requirements imposed by the pass-through entity on the subrecipient are used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award; see [2 CFR Part 200.332 Requirements for pass-through entities](#). In short, federal requirements and terms and conditions flow down from the recipient to the subrecipient.

For reference:

- *Modified Total Direct Cost (MTDC)* means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs. See definition reference here: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>
- Indirect Cost Guidance for EPA Recipients: <https://www.epa.gov/sites/default/files/2018-08/documents/indirect-cost-policy-guidance-for-recipients-of-epa-assistance-agreements.pdf>
- Subaward Policy Additional resources: <https://www.epa.gov/grants/epa-subaward-policy-additional-resources>

37. Can in-kind staff time be used as cost share?

Answer: In-kind staff or volunteer time is allowed. However, the time hours will need to be monetized to show the specific match amount. For example, if you are anticipating hosting an outreach event using approximately 20 volunteers for 2 hours at \$20/hour, then the total = \$800 of in-kind match. See page 4 of the Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance (revised January 2023) found at: <https://www.epa.gov/sites/default/files/2019-05/documents/applicant-budget-development-guidance.pdf>

Cost sharing or matching specifics can also be found at [2 CFR §200.306 under the Code of Federal Regulations Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#).

38. Is the range of application amounts given expected to be inclusive of the 25% match, or do applicants add the 25% to the requested amount for a total project budget that is higher than that range?

Answer: The federal portion, or what an applicant is requesting of EPA, is the application amount range. This is \$300,000 - \$3,000,000 for the Science and Monitoring RFA. The applicant's required cost share is

in addition to the federal share. The 25% cost share is 25% of the total budget (EPA + Match), the EPA/federal portion will be 75% of the total, and match will be 25% of the total. For example, if the applicant is requesting \$3,000,000 in federal funds from EPA, then the total application amount is \$4,000,000; \$3,000,000 (federal funds) + \$1,000,000 (25% cost share of total budget).

39. How do I calculate match?

Answer: Match amount is 25% of the total budget, not just the federal share. There are two ways to calculate matching funds:

1) Calculate how much you will spend on the entire project, including the EPA federal funds you are requesting and your own and partner contributions. Divide by 4. The result is the minimum match required.

- Example: Total project cost is \$200,000. Divide \$200,000 by 4 and the result is \$50,000. \$50,000 is the amount of your matching funds and you would request \$150,000 from EPA.

2) Calculate how much you will request from EPA only. Divide by 3. The result will be the minimum match required.

- Example: You are requesting \$150,000 from EPA. Divide \$150,000 by 3 and the result is \$50,000. \$50,000 is the amount of your matching funds and the total cost of the project is \$200,000.

40. What is included in the Total Project Cost? Is Mandatory Cost Share included? Should I also include Other Leveraged Funds?

Answer: EPA Funding + Mandatory Cost Share = Total Project Cost. Mandatory cost share is 25% of the total project cost. Other Leverage Funds may be included, for description purposes only, but should NOT be included in budget, SF424, and SF424A calculations.

41. How are labor implementation costs categorized?

Answer: Labor can be funded in many ways, and depending on which type of labor is used, the Object Class Category will be different. For example, paying for applicant staff time dedicated to the project comes under Personnel, consultant or partner staff time comes under Other as a sub-award, and contracting for commercial services will be placed under Contractual. An applicant could also have labor or in-kind staff time count towards their match contribution.

42. What is the difference between Equipment and Supplies object class categories?

Answer: EPA defines Equipment is an item with a cost of \$5000 or more per unit and a useful life of more than one year. Items that cost less than \$5000 per unit are considered Supplies.

43. Can a grant project provide “incentives” to participants, volunteers, etc.?

Answer: Every purchase needs to be tied to the workplan outputs and the overall project outcomes. For example, if at a funded event frisbees are given away with no connection to the project, that would be unallowable. Grantees cannot give away incentives that appear random. However, if the grantee were to give away water bottles with their program’s website printed on them to encourage people to use reusable water bottles, this may be allowable. Incentives such as stipends, travel assistance for non-employees, etc., would likely be considered Participant Support Costs and fall under the Other Object

Class Category in the budget. For more information see page 34 of the Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance (revised January 2023) found at: <https://www.epa.gov/sites/default/files/2019-05/documents/applicant-budget-development-guidance.pdf>

44. If the consultant's hourly rate exceeds the EPA allowable maximum rate for a consultant, does that mean the project proposal cannot include consultant type work?

Answer: No, the applicant can still submit a work plan and budget that includes consultant type work, if the work supports the work plan and is reasonable, allocable, and allowable. However, EPA can only reimburse up to the maximum allowable amount. See [EPA General Terms and Conditions](#) for the consultant cap. The applicant would need to cover any remaining consultant costs using other funds. Additionally, the applicant cannot use their 25% match funds to cover remaining consultant fees as EPA Terms and Conditions apply to both the EPA Federal Funds and Cost Share of an award.

[Questions related to grant management:](#)

45. Can you describe the reporting requirements?

Answer: Semi-annual progress reports, a Quality Assurance Project Plan, and a detailed final report will be required. The expectations and schedule for submission of reports will be established by EPA, after the grants are awarded. Award recipients may be provided with additional information and guidance on reporting performance measures and project progress after award.

46. How often does EPA reimburse awarded grantees?

Answer: Grantees will have access to a system called Automated Standard Application for Payments (ASAP) where they will drawdown as needed. As required by [2 CFR 200.305\(b\)](#), 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 under the assistance agreement. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursement of EPA funds. The payment policy states that any funds drawn must be expended within 5 business days.

47. Will the data to be collected under submitted applications need to be made publicly available?

Answer: The programmatic terms and conditions state that "All water quality data generated in accordance with an EPA approved Quality Assurance Project Plan as a result of this assistance agreement, either directly or by subaward, will be required to be transmitted into the Water Quality Portal (WQP) using either WQX or WQX web. Water quality data appropriate for the Water Quality Portal (WQP) include physical, chemical, and biological sample results for water, sediment and fish tissue. The data include toxicity data, microbiological data, and the metrics and indices generated from biological and habitat data. The Water Quality Exchange (WQX) is the water data schema associated with the EPA, State and Tribal Exchange Network."

48. After this current RFA passes, when do you think the next funding opportunity will be released?

Ex. Annually, every other year, etc.?

Answer: We do not have a position on the timing of future funding opportunities at this time. Visit the [Columbia River Basin Restoration Program website](#) for information on upcoming funding opportunities.