

Frequently Asked Questions

Transboundary Watershed Grant Funding Opportunity

Last updated 12/12/2024 (future additions will be marked as “new” or “revised”)

Below are answers to questions about EPA's [U.S.-British Columbia Transboundary Watershed Grant Program](#).

Related information:

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

Contents

Questions related to webinar materials/logistics:	3
1. Are the PowerPoint presentation slides from the webinar available for download?	3
2. Will there be a recording of the webinar available for download?	3
Questions related to project eligibility:	3
3. 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?	3
4. Is the scope of the grant program limited to mining activities in B.C. only, or does it include mining activities in the U.S.?	3
5. Who is eligible to apply under this NOFO?	3
6. Will this program be a part of the PPG-IGAP vehicle or fall under its own program.	3
Questions related to grant application requirements:	3
7. If an entity submits an application ahead of the NOFO deadline, can they alter it?	3
8. 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?	4
9. If two eligible entities are applying, can they be co-applicants?	4
10. Can another federal agency be included as a subawardee?	4
11. Are Tribes required to submit a Tribal Resolution with their grant application for the EPA Transboundary Watershed Grant program? If not, is there a requirement for a signed letter of support from a Tribal Council or staff member, such as from the Executive Director or Tribal President?	4
12. Are references considered part of the 10-page limit?	4
13. The NOFO's evaluation review criteria include Past Performance in successfully completing and managing assistance agreements. Should we provide information about the individual applicant's federal grants, or a list of the federal grants from the entire entity (ideally EPA grants)?	4

14. Do we need to include a Quality Assurance Project Plan as one of our supporting documents? Or that is something we can develop if selected and subsequently submit to EPA?	4
Questions related to budget:	5
15. What does “incremental funding” mean?	5
16. Can you clarify how to round budget numbers as expected for the SF-424A?	5
17. Is there a mandatory cost-share/match requirement for these awards?	5
18. Are tribal non-government organizations eligible for subawards (e.g. CRITFC)?	5
19. Can an eligible entity contract with another entity to get the work done?	5
20. How should partnerships be reflected in the budget? Is it a subset of a larger project or would there be two submittals which identify each other as partners? Or is it just an agreement to share resources outside of the allocated funding. Or all of the above?	5
21. 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?	6
22. What is the indirect cost (IDC) that applies to the recipient?	6
23. For subawards, what is the IDC policy (what is the rate, and who determines it)?	6
24. If we plan to do a subaward, do we need to include a subaward agreement as part of our application? Or can we enter an agreement after the grant is awarded (if awarded)?	6
25. What level of detail is needed for the subaward budget in the grant application? And does the subawardee need to be named in the grant, along with the subaward IDC rate?	6
26. Are there limitations to the maximum IDC chargeable on subawards?	6
27. How are labor implementation costs categorized?	7
28. Do we need to explain personnel rates? Or include supporting documentation?	7
29. What Is the difference between Equipment and Supplies object class categories?	7
30. Can a grant project provide “incentives” to participants, volunteers, etc.?	7
31. 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?	8
32. What GSA rates should be used for travel to Canada?	8
33. Some EPA grant programs limit and/or do not allow travel to Canada. Will those restrictions be noted?	8
Questions related to grant management:	8
34. How often does EPA reimburse awarded grantees?	8
35. Will the data to be collected need to be made publicly available?	8
36. If selected, what is the relationship between requesting funds, receiving funds and spending them down?	9

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 the webinar are available by request by emailing Chatriand.Tyler@epa.gov.

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

Answer: The webinar was recorded and is available by request by emailing Chatriand.Tyler@epa.gov.

Questions related to project eligibility:

3. 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 6 of the NOFO, including how they address the core elements as stated in Section 3. Evaluation scores are contingent on one or more core element being addressed but scores will not depend on the number of core elements addressed, rather on the quality with which they are addressed. In short, yes, a single application could address multiple core elements and include multiple activities.

4. Is the scope of the grant program limited to mining activities in B.C. only, or does it include mining activities in the U.S.?

Answer: The scope of this grant program is limited to transboundary watersheds that contain mining activities in B.C. Note that there may also be mining activities in the U.S., but the scope of the proposals under this opportunity must address potential impacts from mining activities occurring in B.C. Please see Other Eligibility Requirements in Section 2 of the NOFO, which states: "For the purpose of this funding opportunity, transboundary watersheds are defined as rivers, lakes, or watersheds that flow from the Canadian Province of British Columbia (B.C.) into the states of Montana (represented by EPA Region 8), Idaho, Washington, and/or Alaska (represented by EPA Region 10). These watersheds must have existing or proposed mining activities in B.C. that impact (or may impact) U.S. waters."

5. Who is eligible to apply under this NOFO?

Answer: Under this solicitation, only the following entities are eligible to apply for assistance: Indian Tribes, Intertribal consortia, state governments, and local governments. Organization types are consistent with definitions at [2 CFR 200.1](#).

6. Will this program be a part of the PPG-IGAP vehicle or fall under its own program.

Answer: No, the Transboundary Watershed Grant Program is a competitive funding opportunity and thus falls under its own program.

Questions related to grant application requirements:

7. If an entity submits an application ahead of the NOFO 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 by applying through grants.gov. However, the entity cannot withdraw their previous application. If there is a way for the applicant to indicate that this is a revised version that would be helpful. After the NOFO closes and all the applications are received, when EPA sees more than one copy of an application, the application dated last is considered the final version.

8. 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 applicant is required to be registered in SAM, and have a UEI, in order to apply for a grant. If awarded and 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-api-16-01-epa-subaward-policy-epa-assistance-agreement-recipients>).*

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

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

10. 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.*

11. Are Tribes required to submit a Tribal Resolution with their grant application for the EPA Transboundary Watershed Grant program? If not, is there a requirement for a signed letter of support from a Tribal Council or staff member, such as from the Executive Director or Tribal President?

Answer: *No, there is no such requirement for this opportunity. The SF-424 will need to be signed by the organization's authorizing official though and for some tribes this is the Tribal Chair or Tribal Council member. Please plan accordingly.*

12. Are references considered part of the 10-page limit?

Answer: *No. References are provided as "Other Attachment", which are not included as part of the 10-page limit.*

13. The NOFO's evaluation review criteria include Past Performance in successfully completing and managing assistance agreements. Should we provide information about the individual applicant's federal grants, or a list of the 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 organization submitting the application. To see how we will evaluate Past Performance, please see Section 6 of the NOFO.*

14. Do we need to include a Quality Assurance Project Plan as one of our supporting documents? Or that is something we can develop if selected and subsequently submit to EPA?

Answer: *That is something you can do after selected for award. Data collection and monitoring activities will require development of an EPA-approved Quality Management Plan (QMP) and/or Quality*

Assurance Project Plan (QAPP) prior to conducting the activities. QAPPs may be developed after awards are made. This may be included as a task in the project narrative and budget proposal.

Questions related to budget:

For general questions on how to develop a budget, please refer to 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>

15. What does “incremental funding” mean?

Answer: *Incremental funding is different from full or partial funding. An application, if selected for award, may be either fully or partially funded. This refers to the total amount of the final award and may be either the full amount requested by the applicant or some amount less, i.e., partial. How the funds are disbursed to the grantee may be either in one installment or in increments. Incremental funding is a financial mechanism used in government contracting where budgetary resources are allocated to a grant over time rather than providing the full grant amount upfront. EPA will provide funding for multi-year projects in increments awarded each year until the recipient receives the total award amount, assuming future funding is available. See Section I.F of the NOFO for more information. Please note that EPA cannot provide more funding than what the recipient requests in their application.*

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

Answer: *Round up or down to the nearest dollar prior to filling out all budget details, SF-424A, SF-424, and any other documents that include budget information. Do not use cents. If you are using Excel to generate the budget, then we suggest, when formatting cells as currency, remove all decimal places. Please ensure all sub-totals and totals add up correctly. This information is provided on www.grants.gov.*

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

Answer: *No.*

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

Answer: *Yes. For more information on subawards please see <https://www.epa.gov/grants/epa-subaward-policy-additional-resources>.*

19. Can an eligible entity contract with another entity to get the work done?

Answer: *Yes, eligible entities can contract with other eligible or non-eligible entities, such as other governmental entities or universities.*

20. How should partnerships be reflected in the budget? Is it a subset of a larger project or would there be two submittals which identify each other as partners? Or is it just an agreement to share resources outside of the allocated funding. Or all of the above?

Answer: *It could be any of the above. Two or more eligible entities may submit separate applications and indicate that they are partnering in the project narrative. Alternatively, an eligible entity may include a partner as a subawardee in their application, which must also be reflected in the budget. However, there can only be one applicant per application (co-applicants are not accepted) and each application must be able to be implemented independently.*

21. 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: *The applicant can use the de minimis rate of 15% for indirect costs in their proposed budget. For additional information, please see the [Indirect Cost Guidance for Recipients of EPA Assistance Grants](#).*

22. What is the indirect cost (IDC) that applies to the recipient?

Answer: *The current de minimis rate is 15%. Your organization may have their own indirect cost rate agreement negotiated with the federal government. (Your organization's fiscal office should be able to help you.) If so, you can use that rate. If that rate is higher than 15%, you will need to submit a copy of your organization's current, signed agreement as an "Other Attachment" as part of the application package or later if selected for award.*

23. For subawards, what is the IDC policy (what is the rate, and who determines it)?

Answer: *It depends on the subawardee's organization and their negotiated, signed agreement with the federal government. Many may have limits on what they can charge depending on what they negotiate in their subaward agreement. The recipient can charge IDC on the first \$50,000 of each subaward amount to cover administrative costs. For more information on subawards please see <https://www.epa.gov/grants/epa-subaward-policy-additional-resources>.*

24. If we plan to do a subaward, do we need to include a subaward agreement as part of our application? Or can we enter an agreement after the grant is awarded (if awarded)?

Answer: *No, but you will need to provide certain information if selected.*

25. What level of detail is needed for the subaward budget in the grant application? And does the subawardee need to be named in the grant, along with the subaward IDC rate?

Answer: *Please see [eCFR :: 2 CFR 200.331 -- Subrecipient and contractor determinations](#) to determine if the entity is a subaward or a contract. Subaward budget detail and supporting narrative can be included as "Other Attachment" and do not count towards the project narrative page limit. Typically, a subawardee is known in advance of the application submittal. Otherwise, if requesting contractual services, then a description of the services and a bid estimate are sufficient.*

26. Are there limitations to the maximum IDC chargeable on subawards?

Answer: *The recipient can charge 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 \$50,000 of each subaward. (Please note this amount was increased from \$25,000 to \$50,000 as of October 1, 2024.)*

Subrecipients will have submitted a budget to the recipient and if including indirect costs, will use their own organization's negotiated IDC rate agreement or the 15% de minimis. The recipient must ensure all requirements imposed by the recipient to the subrecipient are in accordance with Federal statutes, regulations and the terms and conditions of the Federal award. In short, federal requirements and terms and conditions flow down from the recipient to all subrecipients.

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 \$50,000 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 \$50,000. 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>

27. 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 is listed under Personnel; partner staff time is listed under Other as a sub-award; and, contracting for commercial services, such as lab services, is listed under Contractual.

28. Do we need to explain personnel rates? Or include supporting documentation?

Answer: Yes, please provide a brief description in your budget detail; e.g., 0.25 Project Manager @ \$100,000/yr for 4 years = \$100,000. If you are chosen as a finalist, then yes, you will need to provide documentation to substantiate personnel and any associated costs, such as fringe rate or indirect rate, if that is part of the budget request. You can submit supporting documentation now with your application packet (include as "Other Attachment") or you can submit it later if selected.

29. What Is the difference between Equipment and Supplies object class categories?

Answer: EPA defines Equipment is an item with a cost of \$10,000 or more per unit and a useful life of more than one year. Items that cost less than \$10,000 per unit are considered Supplies.

30. 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 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>

31. 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, the recipient can only request from EPA up to the maximum allowable amount and 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.

32. What GSA rates should be used for travel to Canada?

Answer: Foreign per diem rates for Canada are set by the Department of State and can be found in the following link. Use the rate that is nearest your destination or project location.

https://aoprals.state.gov/web920/per_diem_action.asp?MenuHide=1&CountryCode=1079

33. Some EPA grant programs limit and/or do not allow travel to Canada. Will those restrictions be noted?

Answer: As noted in Section 3 of the NOFO, international travel to Canada is allowed under this grant program. Applicants should clearly document this on the budget form (SF-424A) and within the budget detail of their project narrative. Additional foreign travel provisions are also provided in Section 9, "Foreign Travel EPA policy requires that all foreign travel must be approved by its Office of International and Tribal Affairs. The recipient agrees to obtain prior EPA approval before using funds available under this agreement for international travel to Canada unless the trip(s) are already described in the EPA approved budget for this agreement. Recipients that request post-award approval to travel frequently to Canada by motor vehicle (e.g., for sampling or meetings) may describe their proposed travel in general terms in their request for EPA approval. Requests for prior approval must be submitted to the Project Officer for this agreement."

Questions related to grant management:

34. 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.

35. Will the data to be collected need to be made publicly available?

Answer: Yes. Water quality data generated in accordance with an EPA approved Quality Assurance Project Plan as a result of an assistance agreement, either directly or by subaward, is 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.

36. If selected, what is the relationship between requesting funds, receiving funds and spending them down?

Answer:

EPA anticipates awarding projects under three separate Tracks (see Section 3) with \$600,000 in federal funds per Track for a total of \$1.8 million. Individual applications should demonstrate that the project proposal can be successful assuming a budget range of \$50,000 - \$600,000 and a project length of 1 – 6 years. Applicants are encouraged, but not required, to propose project activities beyond the first year that can be incrementally funded should future federal appropriations become available. For example, an applicant may propose five years of activities with a total budget of \$500,000, \$100,000 per year, to be funded under this grant program. The applicant may receive an initial partial award of \$200,000 for the first two years of activities, and the subsequent years may or may not be funded depending on whether future appropriations become available. Awards may be fully or incrementally funded, as appropriate, based on funding availability, satisfactory performance, and other applicable considerations. Incremental funding after the initial award is subject to future appropriations. Post award, drawdowns should occur commensurate to the work being performed. The recipient has the until the end of the project period to spend down the entirety of funds. Please see Section 1.F of the funding opportunity for further information.