Fiscal Year 2026 Frequently Asked Questions for Brownfields Job Training Grants
As of September 18, 2025

EPA prepared these Frequently Asked Questions (FAQs) and Answers to assist prospective applicants with preparing Brownfields Job Training Grant applications for the Fiscal Year 2026 (FY26) competition. Please review the FY 2026 Brownfields Job Training Guidelines, also referred to as the Notice of Funding Opportunity (NOFO), when preparing your application. If information in the FAQs differs from information in the statute, regulation, or the Guidelines, then the statute, regulation, or the Guidelines will take precedence. The FAQs will be updated periodically as we continue to receive questions.

A. Changes to the Brownfields Job Training Grant Guidelines
A.1. How have the Brownfields Job Training Grant Guidelines changed?

B. Information on Submitting the Application
B.1. What is the deadline for submission in FY26?
B.2. How do I submit my application?
B.3. How do I submit an application if I have limited access to the Internet?
B.4. How do I know if my grant application was received by the deadline?
B.5. My organization is registered in www.sam.gov. Should I check to make sure the account is active?
B.6. Can I apply for grant funding if the www.sam.gov account is not active, or is in the process of being updated or re-activated?
B.7. Can someone other than the Authorized Organization Representative submit the application package in www.grants.gov?
B.8. Why is the E-Business Point of Contact important to the application submission process?
B.9. My organization has several departments and corresponding UEI numbers? Can I use a different department's UEI number to submit the brownfields application package?
B.10. Can I use another organization's UEI number to submit the application package?
B.11. The grant application has several attachments. Should I upload them separately or submit as one file in www.grants.gov?
B.12. Per the "Application for Federal Assistance" (SF-424), what is the "Catalog of Federal Domestic Assistance Number" and the "CFDA Title?"
B.13. How should I respond to Question 19 on the SF-424 "Application for Federal Assistance?"

C. General Guidelines and Application Process Questions
C.1. How can I receive help in understanding and responding to the FY26 Brownfields Job Training Grant Guidelines?
C.2. What does the FY26 Brownfields Job Training Grant application process entail?
C.3. How will my application be evaluated?
C.4. What are the "Other Factors" and how do I address these in my application? How are they used in the national evaluation?
C.5. What is the maximum amount of money that an applicant may be awarded?

C.6. Would my application be looked upon less favorably if my organization has never received any type of federal or non-federal financial assistance?
C.7. How can I demonstrate my program is not duplicative of other federally funded environmental job training programs?
C.8. Are stipends or scholarships an eligible use of grant funds under this program?
C.9. Updated on 09/17/2025: Can Participant Support Costs exceed 40% of the total grant award?
C.10. If my organization is successful in obtaining EPA funding, can we charge the costs we incurred for a consultant to prepare our grant application?
C.11. Will EPA fund pre-award costs?
C.12. What formatting should I use for writing my application?
C.13. If a grantee provides training such as the ones described below, can they become a Qualified Environmental Professional?

D. Applicant Eligibility
D.1. Who is eligible to apply for a Brownfields Job Training Grant?
D.2. Can an applicant submit more than one application and serve different communities through each application?
D.3. Can a nonprofit organization or eligible governmental applicant submit a joint application in partnership with a for-profit organization?

E. Brownfields Job Training Coalitions
E.1. What are Brownfields Job Training Coalitions and what requirements must a Brownfields Job Training Coalition meet?
E.2. What does the Brownfields Job Training Coalition Memorandum of Agreement (MOA) contain? How do I obtain a copy of a sample MOA?
E.3. Can the lead Brownfields Job Training Coalition member be replaced with another eligible entity after the application is submitted?
E.4. If I have an existing Brownfields Job Training Grant, am I eligible to apply for a Brownfields Job Training Coalition Grant or be a non-lead member?
E.5. Can a city and a redevelopment agency from the same city be coalition members even though they are from the same city?
E.6. Can two separate state agencies in the same state be members of the Brownfields Job Training Coalition?

F. Training Program Structure
F.1. What training is required?
F.2. Added on 8/20/2025: Is it possible for an individual to only complete the OSHA 8-hour refresher course instead of the OSHA 40-hour HAZWOPER training under the Brownfields Job Training Program?
F.3. What is the average number of individuals trained through a training cycle?
F.4. What is the average number of training cycles delivered under a grant?
F.5. Does EPA require grant recipients/applicants to have a set training curriculum?
F.6. What are some things to consider when designing a curriculum?
F.7. What is the right amount of information to include for describing each training course in a curriculum that is using Brownfields Job Training Grant funds?
F.8. Where can I find information about certified instructors who can deliver the needed

training we are proposing?
F.9. How much of the grant should go towards funding the direct training versus non-training programmatic expenses?
F.10. Can a grant recipient conduct a training cycle in another language, e.g., Spanish?
F.11. Can a grant recipient provide training to individuals who are not currently legal residents of the United States?
F.12. Can a grant recipient provide training to individuals under the age of 18?

G. Community and Employer Partnerships
G.1. Am I required to inform the target community of my intention to apply for a Brownfields Job Training Grant before or during the preparation of my application?
G.2. How can I get the target community involved in my proposed training?
G.3. What type of roles might community-based organizations play in my proposed training?
G.4. How do I get potential employers from my target community involved in my proposed training program?
G.5. Where can I find information on other environmental job training programs and receive assistance in developing my own?

H. Administrative Costs
H.1. Are there limits on administrative costs for Brownfields Job Training Grants?
H.2. My organization's federally negotiated rate that is greater than 5%. Can we charge more than 5% for indirect costs?
H.3. Does the term "administrative cost" include both direct and indirect costs?
H.4. Does the limit on administrative costs for Brownfield Grants conflict with the requirement in 2 CFR § 200.414(c) for EPA to accept recipients' negotiated indirect cost rate?
H.5. Updated on 09/17/2025: What is the difference between a direct administrative cost and a programmatic cost?
H.6. What are examples of eligible direct administrative costs?
H.7. Updated on 09/18/2025: What are examples of allowable programmatic costs that are not subject to the 5% administrative cap?
H.8. Can unrecovered indirect costs in excess of the 5% limit on administrative costs be used for voluntary cost share?
H.9. Can unrecovered indirect costs in excess of the 5% limit on administrative costs be counted towards leveraged funding other than voluntary cost share?
H.10. If I name a consulting firm as a "partner" in the application is it proper to award that firm a sole source contract on that basis**?**

A. Changes to the Brownfields Job Training Guidelines

A.1. How have the Brownfields Job Training Grant Guidelines changed?

EPA has made several revisions to the Brownfields Job Training Guidelines since the last competition. A more detailed description of changes is outlined in the *Fiscal year 2026 Brownfields Job Training Guidelines Summary of Changes* and reflected in the solicitation.

B. Information on Submitting the Application

B.1. What is the deadline for submission in FY26?

Applications are due **September 26, 2025,** at 11:59 p.m. Eastern Time. **Applications received after 11:59 p.m. ET on September 26, 2025, will not be considered for funding.**

B.2. How do I submit my application?

Your organization's Authorized Organization Representative (AOR) must submit your complete application package electronically to EPA through www.grants.gov. Applications must be received no later than 11:59 p.m. ET on **September 26, 2025**. Please allow enough time to successfully submit your application package and allow for unexpected errors that may require you to resubmit.

In order to submit an application through www.grants.gov, you must:

- Have a unique entity identifier (UEI),
- Have an active System for Award Management (SAM) account in www.sam.gov,
- Be registered in www.grants.gov, and
- Be designated as your organization's AOR.

For more detailed instructions on submitting through www.grants.gov, please refer to our tip sheet which can be found here.

B.3. How do I submit an application if I have limited access to the Internet?

As stated in Appendix 1 of the Guidelines, an applicant may request to submit a hardcopy of the application if the applicant lacks the technical capability to apply electronically through www.grants.gov because of limited Internet access or no internet access which prevents them from being able to upload the required application materials through www.grants.gov. The applicant must follow the procedures outlined at www.epa.gov/grants/exceptions-grantsgov-submission- requirement. Please note that your request must be received at least 15 calendar days before the application due date to allow enough time to negotiate alternative submission methods.

B.4. **How do I know if my grant application was received by the deadline?**

If submitted successfully, the Authorized Organization Representative (AOR) will receive a ***Submission Receipt*** email confirming the application package was initially received. You can track the status of your application package anytime by using the link provided at the bottom of the email.

Next, www.grants.gov will process the application package to ensure it is error-free. If the application package passes this step, the AOR will receive a ***Submission Validation Receipt for Application*** email. Alternatively, if the application package has an error, the AOR will receive an email indicating the application package was "rejected with errors" and what the error is. This gives you the opportunity to resolve the error and for the AOR to re-submit the application package before the submission deadline.

If you did not receive a confirmation email, need assistance with submitting your application package, or have questions, contact the www.grants.gov Help Desk at 1-800-518-4726 or support@grants.gov. The Support Center is open 24 hours a day, 7 days a week; closed on federal holidays.

For more information on how to submit an application, see Appendix 1 of the Guidelines. Additionally, the www.grants.gov website has an Applicant Training page, which includes a series of videos on various aspects of the submission process.

B.5. **My organization is registered in www.sam.gov. Should I check to make sure the account is active?**

Yes! You can only successfully submit an application package if your organization has an active account in www.sam.gov. The registration must be renewed annually by the E-Business Point of Contact, so make sure the account does not expire before the application submission deadline.

B.6. **Can I apply for grant funding if the www.sam.gov account is not active, or is in the process of being updated or re-activated?**

No. Your organization must have an active account in www.sam.gov in order to apply for funding.

B.7. **Can someone other than the Authorized Organization Representative submit the application package in www.grants.gov?**

No. The Authorized Organization Representative, designated by the E-Business Point of Contact, must sign and submit the application package.

B.8. **Why is the E-Business Point of Contact important to the application submission process?**

The E-Business Point of Contact (EBiz POC) is the individual in your organization who

oversees all activities within www.grants.gov and grants permissions to Authorized Organization Representatives (AOR).

If your organization is already registered in www.sam.gov, take note of who is listed as the EBiz POC. If you're not registered yet, it is the EBiz POC within your organization who must register your organization with www.sam.gov.

The EBiz POC is issued a Marketing Personal Identification Number (MPIN) by www.sam.gov, which gives the EBiz POC the authority to designate who in your organization can submit applications through www.grants.gov (i.e., the Authorized Organization Representative).

The EBiz POC is also responsible for approving role requests in www.grants.gov. Upon creating an account in www.grants.gov, the AOR role request is automatically sent to your organization's EBiz POC for approval.

Note, there can only be one EBiz POC per UEI number.

B.9. **My organization has several departments and corresponding UEI numbers? Can I use a different department's UEI number to submit the brownfields application package?**

No. You must use the UEI number assigned to the department that is submitting the application package. Additionally, this UEI number must correspond to the UEI number in www.sam.gov.

B.10. **Can I use another organization's UEI number to submit the application package?**

No. You must use the UEI number assigned to the organization that is submitting the application package. Additionally, this UEI number must correspond to the UEI number in www.sam.gov.

B.11. **The grant application has several attachments. Should I upload them separately or submit as one file in www.grants.gov?**

While not required, EPA recommends consolidating all grant application documents (the Narrative Information Sheet, Narrative, required attachments, etc.) into one pdf file. This ensures that EPA receives your entire submission and the submission is in the order that you intended. Please review the *Tips for Submitting Brownfields Grant Competition Applications* for additional application submission tips.

B.12. **Per the "Application for Federal Assistance" (SF-424), what is the "Catalog of Federal Domestic Assistance Number" and the "CFDA Title"?**

The "Catalog of Federal Domestic Assistance (CFDA) Number" is 66.815 and the "CFDA Title" is Brownfields Job Training Cooperative Agreements.

B.13. **How should I respond to Question 19 on the SF-424 "Application for Federal Assistance"?**

Question 19 on the SF-424 references Executive Order (E.O.) 12372, Intergovernmental Review of Federal Programs. Applicants must choose one of three options:
This application was made available to the State under the E.O. 12372 Process for review on (enter date).
Program is subject to E.O. 12372 but has not been selected by the State for review.
Program is not covered by E.O. 12372.

Applicants must answer question 19 in order to complete the SF-424 and submit the application package. This Executive Order does not apply to the Brownfields Job Training program, therefore option c. should be selected.

C. General Guidelines and Application Process Questions

C.1. **How can I receive help in understanding and responding to the FY26 Brownfields Job Training Grant Guidelines?**

EPA will be hosting a webinar for prospective applicants that will explain the process of applying for a Brownfields Job Training Grant and how applications will be evaluated. This webinar will be held on May 7, 2025, at 1 PM – 3:30 PM EDT. Please use this link to join the event. A copy of the presentation will be available on the FY26 Brownfields Job Training Grant Solicitation Page and a recording of the webinar will be posted once it is complete.

EPA Regional Job Training Coordinators may respond to questions regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about this announcement. EPA staff cannot meet with individual applicants to discuss applications, provide informal comments on applications, or provide advice to applicants on how to respond to criteria. EPA's limitations on staff involvement with grant applicants are described in EPA's Assistance Agreement Competition Policy (EPA Order 5700.5A1). Contact information for each EPA Regional Job Training Coordinator can be found in Section 1.E. of the NOFO or on EPA's website.

While EPA may only provide limited pre-application assistance, EPA Technical Assistance to Brownfields Communities (TAB) providers, are EPA cooperative agreement recipients that provide technical assistance to prospective Brownfields Job Training Grant applicants, including assistance to better understand the threshold eligibility requirements, facilitate discussions within the community related to the application, and reviewing draft applications. P lease note, however, that while a TAB provider is a source of technical assistance, they will not write an application for you, and the applicant is responsible for the content of their applications. Find your TAB provider at https://www.epa.gov/brownfields/interested-applying-brownfields-job-

training-funding#TAB.
Additionally, EPA funds a variety of nationwide expert organizations to assist communities with brownfields issues. Technical assistance is available at no cost to communities and includes:

- Technical Assistance to Tribes
- Brownfields Job Training Technical Assistance
- Technical Assistance for Nonprofits
- Brownfields Land Banking Strategies
- National Brownfields Training Conference
- Brownfields Revitalization Anti-Displacement Strategies Program

More information on Nationwide Technical Assistance providers is available at www.epa.gov/brownfields/technical-assistance#Nationwide.

C.2. **What does the FY26 Brownfields Job Training Grant application process entail?**
To apply for a Brownfields Job Training Grant, one must submit an application through www.grants.gov. In order to use www.grants.gov, one must register their organization, obtain a UEI number and register with www.sam.gov. This process can take weeks to complete and applicants are strongly encouraged to begin their registration process well before the application deadline. For step by step instructions, please reference applicant resources posted on www.grants.gov or EPA's tip sheet.

C.3. **How will my application be evaluated?**

In order for your application to be evaluated, it must first pass all threshold criteria. Threshold criteria are evaluated on a pass/fail basis. If an applicant fails to meet any of the threshold criteria listed in Section 2.A.1. of the NOFO, the application will be disqualified from further consideration and the applicant will be notified within 15 business days of the determination.

Applications that pass threshold review will be scored on their responses in their Narrative by a national review panel. The national review panel will base their review on the review criteria outlined in Section V of the NOFO. Applicants should respond to the Narrative Section in Section 6.B. of the Guidelines. Applications are scored out of 200 points.

C.4. **What are the "Other Factors" and how do I address these in my application? How are they used in the national evaluation?**

When making the final decision on which application to select for funding, the Selection Official may take into account one or more of the other factors, as outlined in Section 6.C.1. of the Guidelines. Alternatively, the Selection Official may not take into account any of the other factors or considerations.

Applicants should provide responses on the applicable other factors using – Sample Other Factors Checklist Form, as described in Section 4.A.1.ix., and should be included

in the Narrative Information Sheet. EPA will use the content included in the application and/or external information to determine if the consideration applies.

C.5. **What is the maximum amount of money that an applicant may be awarded?**

An eligible applicant may apply for up to $500,000 per grant for eligible activities. In FY26, EPA anticipates awarding approximately 20 Brownfields Job Training Grants at a total of $10,000,000. Actual funding is dependent upon the availability of funds through the federal budget process, quality of applications received, and other applicable considerations. EPA reserves the right to partially fund applications or make no awards at all.

C.6. **Would my application be looked upon less favorably if my organization has never received any type of federal or non-federal financial assistance?**

No. If you have never received any type of federal or non-federal financial assistance, you must indicate so in the programmatic capability section of your application to receive a neutral score for this sub-criterion (5 points). Failure to respond to this criterion will result in a score of zero.

C.7. **How can I demonstrate my program is not duplicative of other federally funded environmental job training programs?**

Applicants must demonstrate that their proposed training program does not duplicate other Federally-funded programs for environmental job training in your target community, including training provided through the EPA's Superfund Job Training Initiative (SuperJTI).
Applicants must demonstrate that the proposed training project does not duplicate National Institute of Environmental Health Sciences (NIEHS) Hazardous Waste Worker Training programs in their target community or Department of Labor (DOL) grant funds that include brownfields remediation, renewable energy, HVAC, or other energy-related training or wastewater treatment technology operator training. Federal agencies maintain lists of these grant programs at the following websites:

- EPA: www.epa.gov/superfund/superfund-job-training-initiative
- NIEHS: www.niehs.nih.gov/careers/hazmat/about_wetp/ecwtp/index.cfm
- DOL: https://www.dol.gov/general/grants/howto

If you are listed on any of these websites as a recipient, you must explain how services under your proposed program will complement, but not duplicate, the existing federal environmental job training activities in your targeted service area (i.e., different target audience, such as a different age group, differing types of certification training).

C.8. **Are stipends or scholarships an eligible use of grant funds under this program?**

Yes. Stipends for students, including on-the-job training costs or reasonable child-care subsidies, are **eligible** under this grant opportunity. Recipients must maintain

accounting records to support stipend payments and child care subsidies as indicated in the EPA Guidance on Participant Support Costs.

Scholarship funds to support students' enrollment in college courses are **not eligible**. If the applicant is paying a trainer for students to attend the training course, they must be a subawardee of the grant.

Costs associated with eligible participant support costs, including costs associated with transporting trainees to site visits during training or for trainees to get to and from class **are eligible**.

C.9. **Can Participant Support Costs exceed 40% of the total grant award?**

No, PSCs cannot exceed 40% of the total grant award unless prior approval is provided by the EPA GMO or Award Official. Note, it is very unlikely that approval will be granted. As stated in the Budget section of Section 4.A.3.c. of Solicitation EPA-I-OLEM- OBLR-25-01, for the Brownfields Job Training Program "Transportation stipends, monetary stipends, and childcare subsidies are considered participant support costs that are separate and do not count toward instruction/training costs. The total amount of stipends, including participant support costs to hire the trainees as W2 employees, may not exceed 40% of the total award." Participant support costs are allowable under all Brownfields Grants as provided at 2 CFR § 200.456. An applicant should clearly state in the application budget justification that the organization intends to use EPA funds for the specific participant support costs. Participant support costs may also be approved in response to a post-award written request for approval from a recipient. Based on the limitations of allowable PSCs stated in Solicitation EPA-I-OLEM-OBLR-25-01, GMOs would not approve an increase in PSCs beyond 40% of the total award unless a compelling justification is submitted by the recipient and concurred upon by the EPA Project Officer.

C.10. **If my organization is successful in obtaining EPA funding, can we charge the costs we incurred for a consultant to prepare our grant application?**

No. Costs for preparing your application are not an allowable direct administrative cost.

C.11. **Will EPA fund pre-award costs?**

EPA does not guarantee the payment of pre-award costs. Applicants incur pre-award costs at their own risk and EPA is under no obligation to reimburse applicants for pre-award costs. As indicated in 2 CFR § 1500.9, under certain circumstances, the applicant may be reimbursed for eligible, allowable, allocable, and reasonable costs that are incurred up to 90 days before grant award without prior EPA approval if:

The applicant includes the pre-award costs in its application and the work plan negotiated with EPA;
EPA agrees that the costs are eligible and allowable when the Agency approves the scope of work for the grant; and

Any procurement contracts that are funded with pre-award costs comply with the competitive procurement requirements within the grant.

As provided in 2 CFR § 200.458 pre-award costs must be incurred ". . . pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work." EPA interprets this provision to require that eligible pre-award costs be incurred after applicants for competitive funding receive notification of selection.

Please note, an applicant must obtain prior EPA approval from the Award Official to incur pre-award costs more than 90 days before award. Applicants selected for award will need to discuss any pre-award costs greater than 90 days with their EPA Project Officer to discuss the process for getting these costs approved.

C.12. **What formatting should I use for writing my application?**

As stated in Section 4.a. of the NOFO, the Narrative and Narrative Information Sheet must be typed on letter-sized ($8^1/_2$ x 11 inch) paper, be single-spaced, and should use Times New Roman, Arial, or Calibri font, sized no smaller than 12-point font. All application materials, including Partnership Letters, must be submitted in English. Photos and graphics will not be considered. Attachments are limited to those identified in Section 4.A.2. of the NOFO, and are limited to one scanned image per page. Applicants must provide their response to Section 2.A.1. Threshold Eligibility Criteria as an attachment to the Narrative that is submitted to EPA. Extraneous materials, including attachments not listed, will not be considered. Application materials and attachments exceeding the page limits described below will not be reviewed. Applicants are responsible for submitting a complete application, as described in Section 4.A of the NOFO, by the due date.

C.13. **If a Brownfields Job Training grantee provides training such as the ones described below, are the trainee participants considered Qualified Environmental Professionals upon completion?**

- **Training in the assessment, inventory, analysis, and remediation of sites or facilities at which hazardous substances, pollutants, contaminants, and petroleum products are located, transported, or disposed, including training for jobs in environmental sampling, demolition, underground storage tank removal, groundwater extraction, site remediation, and equitable development associated with brownfields.**
- **Training in chemistry, toxicology, and geology to the extent necessary to inventory, assess, remediate, and clean up contaminated sites.**
- **Training in the requirements and implementation of the All Appropriate Inquiries (AAI) Final Rule, as required in CERCLA Section 101(35)(B), and due diligence.**

No. The training provided as part of a Brownfields Job Training Grant is designed for an individual to be able to support a Qualified Environmental Professional (QEP)

and/or work under the supervision and guidance of a QEP rather than to qualify as QEP immediately upon completion of the training courses. To become a QEP, an individual must meet a series of educational and/or experience requirements. For example, individuals who have a bachelor's degree or higher in engineering or science from an accredited institution of higher education and who have the equivalent of five years of relevant, full-time experience qualify as an environmental professional under the AAI final rule. Individuals who do not meet the educational requirements can still qualify as an environmental professional but if they have the equivalent of 10 years of relevant, full-time experience. "Relevant" experience is further described in EPAs publication regarding AAI. It is unlikely that trainees in the Job Training Program will meet these educational and experience requirements immediately upon completion of the training courses described in the question.

D. Applicant Eligibility

D.1. Who is eligible to apply for a Brownfields Job Training Grant?

Applicants must be either certain eligible **entities** as defined in CERCLA § 104(k)(1) or other eligible **nonprofit organizations** as defined in 2 CFR § 200.1. In accordance with CFDA 66.815, the following entities are eligible to apply for a Brownfields Job Training Grant:

- General Purpose Unit of Local Government (EPA uses the definition of *Local government* in 2 CFR 200.1.)
- Land Clearance Authority or other quasi-governmental entity that operates under the supervision and control of, or as an agent of, a general purpose unit of local government.
- Government entity created by State Legislature.
- Regional Council or group of General Purpose Units of Local Government.
- Redevelopment Agency that is chartered or otherwise sanctioned by a State.
- State.
- Indian Tribe other than in Alaska. (The exclusion of Tribes from Alaska, with the exception of the Metlakatla Indian Community as noted below, from grant eligibility is statutory at CERCLA § 104(k)(1)). Intertribal Consortia are eligible for funding in accordance with EPA's policy for funding intertribal consortia published in the Federal Register on November 4, 2002, at 67 Fed. Reg. 67181. (This policy also may be obtained from your EPA Regional Job Training Coordinator listed.)
- Alaskan Native Regional Corporation, Alaska Native Village Corporation and the Metlakatla Indian Community. (Alaskan Native Regional Corporation and Alaska Native Village Corporation as those terms are defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1601 and following).)
- Nonprofit organizations. For purposes of this grant program, consistent with the definition of *Nonprofit organization* in 2 CFR § 200.1 the term "nonprofit organization" means any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable,

or similar purpose in the public interest; is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. Eligible nonprofit organizations may, but are not required to be, exempt from taxation under section 501 of the Internal Revenue Code. Workforce Investment Boards and organized Labor Unions that meet these criteria may be eligible nonprofit organizations. Public and nonprofit private institutions of higher education (including community colleges and similar 2-year institutions) are eligible to apply.

- Nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are **not** eligible to apply. Additionally, for-profit or proprietary training organizations or trade schools are **not** eligible to apply.

D.2. **Can an applicant submit more than one application and serve different communities through each application?**

No. Applicants cannot submit multiple applications, even if the applicant proposes to serve a different target area.

D.3. **Can a nonprofit organization or eligible governmental applicant submit a joint application in partnership with a for-profit organization?**

No. EPA awards Brownfields Job Training Grant funds to a single eligible applicant. Successful applicants may contract for necessary goods and services with for-profit organizations following competitive procurement procedures as required by EPA grant regulations, as applicable. Refer to the Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for detailed guidance.

E. Brownfields Job Training Coalitions

E.1. **What are Brownfields Job Training Coalitions and what requirements must a Brownfields Job Training Coalition meet?**

Brownfields Job Training Coalitions are designed for one "lead" eligible entity to partner with one or more eligible entities that do not have the capacity to apply for and manage their own EPA cooperative agreement. The lead coalition member Brownfields Job Training Coalition Grant application on behalf of itself and the other members for the job training work that will be performed within the target area. The coalition may request up to $500,000 to recruit, train, and place unemployed and under-employed residents of solid and hazardous waste-impacted communities with the skills needed to obtain full-time, sustainable employment. The grant recipient (lead coalition member) must apply for and administer the grant, be accountable to EPA for the proper expenditure of the funds and be the point of contact for the other coalition members. A Memorandum of Agreement (MOA) documenting the coalition's process must be in place prior to the expenditure and draw down of any funds that have been awarded to the lead coalition member. It is up to the coalition to agree internally on the distribution of funds and the mechanisms for implementing the Brownfields Job Training work.

E.2. **What does the Brownfields Job Training Coalition Memorandum of Agreement (MOA) contain? How do I obtain a copy of a sample MOA?**

The MOA is an agreement that all coalition members must sign prior to the expenditure of any awarded Brownfields Job Training funds. The MOA provides all members' contact information, how often the members will meet, how many students will be recruited, trained, and placed in an environmental full-time job, and other specifics on the managing of contractors, community involvement plans, program support for job placement, and specific commitments for coalition members.

A Model MOA template is posted on the EPA Brownfields website at https://www.epa.gov/system/files/documents/2025-05/bfjt-coalition-moa.pdf.

E.3. **Can the lead Brownfields Job Training Coalition member be replaced with another eligible entity after the application is submitted?**

No. The lead entity cannot be replaced with another eligible entity after the application is submitted to EPA. Additionally, the lead member must partner with the other coalition members that were named in the application. EPA will evaluate the lead coalition member's Brownfields Job Training Coalition Grant application based on the composition of the coalition as described in the application. Lead coalition members should contact their EPA Project Officer if concerns arise regarding other coalition members.

E.4. **If I have an existing Brownfields Job Training Grant, am I eligible to apply for a Brownfields Job Training Coalition Grant or be a non-lead member?**

No. Coalition members may not be members of other FY26 Brownfields Job Training Coalition Grant applications, nor may coalition members submit a Brownfields Job Training Grant application as an individual applicant. A coalition member wishing to apply as part of a different Brownfields Job Training Coalition or as an individual applicant must withdraw from the coalition.

E.5. **Can a city and a redevelopment agency from the same city be coalition members even though they are from the same city?**

Yes, provided city and the redevelopment agency are separate legal entities under state and local law, and that the redevelopment agency is not otherwise an instrumentality, and meets the definition of an eligible entity as described in the Brownfields Job Training Grant Guidelines. The IRS provides guidance on determining whether organizations are instrumentalities of units of government which provides in pertinent part:

> An instrumentality is an organization created by or pursuant to state statute and operated for public purposes. Generally, an instrumentality performs governmental functions, but does not have the full powers of a government, such as police authority, taxation and eminent domain. A wholly-owned instrumentality of one or

more states or political subdivisions is treated as a state or local government employer for purposes of the mandatory social security and Medicare provisions and also applies to entities covered under Section 218 of the Social Security Act. ... In Revenue Ruling 57-128, the IRS addressed the question of whether an organization is wholly-owned by one or more states or political subdivisions. In making this determination, the following factors are taken into consideration:

- Whether it is used for a governmental purpose and performs a governmental function subdivisions.
- Whether there are any private interests involved, or whether the states or political subdivisions involved have the powers and interests of an owner.
- Whether control and supervision of the organizations is vested in public authority or authorities.
- Whether express or implied statutory or other authority is necessary for its creation and/or use of the instrumentality, and whether such authority exists.
- The degree of financial autonomy and the source of operating expenses.

Schools, hospitals and libraries, as well as associations formed for public purposes, such as soil and water conservation, may be instrumentalities, depending on the facts and circumstances. State sponsorship of an organization, state regulation of its activities, the participation of its employees in a public retirement system and operation with public funds are among the factors to be considered in determining whether an organization is an instrumentality. If an organization is essentially under private ownership and control, it is not an instrumentality.

Note: Brownfields Job Training Coalitions are designed for the "lead" entity to partner with entities that have limited capacity to manage their own EPA cooperative agreement.

Additionally, as required in the Brownfields Job Training Grant Guidelines, only one target area can be identified in the application.

E.6. **Can two separate state agencies in the same state be members of the Brownfields Job Training Coalition?**

No. Two state agencies cannot be coalition members if they are components of the state government that are subject to direct control of the governor such as environmental agencies, transportation agencies, health departments, parks and recreation departments and departments of commerce. Further, a state agency can only be the lead member of a coalition. Other entities created by the state legislature such a regional planning commissions that are not subject to the direct control of the governor can be coalition members along with a state agency.

F. Training Program Structure

F.1. **What training is required?**

The only required training is OSHA 29 CFR 1910.120 40-hour HAZWOPER, beyond this, the applicant has the ability to design a curriculum as they see fit so long as the courses offered are an eligible use of grant funds. Please be sure to consult Section 3.A.4 and 5 of the FY26 Brownfields Job Training Grant Guidelines to see what example courses are eligible and ineligible for funding. You can also visit https://www.epa.gov/brownfields/list-eligible-and-ineligible-brownfield-job-training-courses for more examples.

F.2. **Is it possible for an individual to only complete the OSHA 8-hour refresher course instead of the OSHA 40-hour HAZWOPER training under the Brownfields Job Training Program?**

No, all participants who go through training funded by the Brownfields Job Training Program must complete the 40-hour HAZWOPER training course. However, for example, if an individual was trained and employed during the first two years of the grant and later became unemployed by the fourth year, the grantee may provide the OSHA 8-hour refresher course to aid in the individual's re-employment. In such cases, the individual should not be counted again as a graduate or as placed in employment if they were previously accounted for in the Cooperative Agreement Recipient's (CAR's) reported accomplishments.

F.3. **What is the average number of individuals trained during a training cycle?**

In past job training reporting, an average of 20-24 individuals are trained during each cycle. This number may fluctuate depending on where the training program is located, i.e., an urban area versus a rural community. Grant recipients may also have varying levels of enrollment based on the intensity and comprehensiveness of the curriculum, the number of certifications to be earned, and the varying costs of delivering training. EPA encourages applicants to maximize the grant funding to train as many individuals as possible while delivering high-quality training to an appropriate number of jobseekers based on the demand in the local labor market.

F.4. **What is the average number of training cycles delivered under a grant?**

Grant recipients typically offer 2-3 training cycles per year. This number can fluctuate depending on the curriculum being offered, as it correlates to available employment, and the schedule for when a grant recipient plans to offer training (days, nights/weekends, etc.). While EPA does not set requirements on the number of training cycles that must be offered, EPA encourages applicants to offer training as often as possible.

Note: EPA requires applicants to focus the fifth, and final, year of their project period on the placement and tracking of graduates and reporting results to EPA. Thus, it is assumed the last cycle of training will be concluded by the end of year four.

F.5. **Does EPA require grant recipients/applicants to have a set training curriculum?**

No, the only required training is OSHA 29 CFR 1910.120 40-hour HAZWOPER, as stated above.

EPA encourages applicants to have multi-faceted curricula and offer diversified training in order to assist graduates with obtaining sustainable, full-time employment in various cleanup, remediation and redevelopment activities. This is important given the nature of contractual short-term remediation work, seasonal hiring in the environmental and remediation fields, and for individuals who may be entering the workforce for the first time.
Courses within a curriculum may vary in their intensity and level of detail; EPA encourages applicants to clearly explain at what level each course will be offered (e.g., awareness, intermediate, and/or advanced).

F.6. **What are some things to consider when designing a curriculum?**

The goal of the Brownfields Job Training Program is to help its participants develop the skills and earn the certifications needed to secure full-time careers across a spectrum of brownfield-related activities, including the assessment, cleanup, remediation, and planning/site preparation for the revitalization of brownfield sites. Your proposed training curriculum must link to the local labor needs of your target community in order to secure employment for program participants. Before deciding what types of training to offer, the results of employer discussions conducted in your community and/or local labor market assessments can be used to help you forecast employment opportunities for which training is needed.

Obtaining commitments from employers in your community, who are looking for individuals with the certifications and skills you plan to deliver in your training, and who will hire graduates from your program can increase your application's chances of success.

F.7. **What is the right amount of information to include for describing each training course in a curriculum that is using Brownfields Job Training Grant funds?**

Applicants are responsible for determining what information to include in their application and the responses must provide sufficient detail to allow for an evaluation of the merits of the application. Please see the below for an example training course descriptions and the level of detail that an applicant may provide. Please note that these examples are intended to be illustrative. All training must relate to facilitating the inventory of brownfield sites, site assessments, remediation of brownfield sites, community involvement, or site preparation. Applicants must indicate the specific types of training they propose to deliver in their training program description.

- OSHA 40- Hour HAZWOPER Training

  The course satisfies training requirements outlined in OSHA standards 29 CFR §§

1910.120 and 1926.65, which require workers to complete HAZWOPER training before starting work at an uncontrolled hazardous waste operation. HAZWOPER training prepares cleanup and emergency response workers to operate safely during a variety of scenarios involving hazardous substances. Training includes hazard recognition, exposure limits, risk evaluation for chemical and general site safety concerns, operation of field monitoring equipment, and use of PPE. This training covers policies, practices and procedures that reduce the risk of injury and illness related to harmful exposures on the worksite.

- Global Hazard Communication

  This course will cover the requirements of OSHA 1910.1200 to provide instruction in the proper classification of the potential hazards of chemicals, and appropriate methods of communication concerning hazards and appropriate protective measures to employee.

  Topics will include: Hazard Classification, who's covered by the standard, Safety Data Sheets, understanding chemicals, Personal Protective Equipment, and exposure to hazardous chemical, leaks and spills.

  Outcomes include: Understanding the OSHA Hazard Communication and Globally Harmonized System standard; recognizing the requirements of an effective GHS Hazcom program and strategies to assist employers in developing proper procedures; identifying types of potential hazardous chemicals and the Hazardous Chemical Inventory, the purpose and information required by GHS of Safety Data Sheet, the required information for proper labels, including GHS pictograms, and Hazcom information and training requirements.

F.8. **Where can I find information about certified instructors who can deliver the needed training we are proposing?**

While EPA does not endorse specific instructors, several EPA programs do provide databases of certified instructors who can deliver different types training. For example, EPA's Lead Program provides a database of certified instructors who can deliver the new lead renovation, repair, and painting (RRP) training. This list can be found at www.epa.gov/lead/renovation-repair-and-painting-program. Note that contract instructors must be hired in compliance with competitive procurement requirements in 2 CFR Parts 200 and 1500.

F.9. **How much of the grant should go towards funding the direct training versus non-training programmatic expenses?**

There is currently no requirement for how much of the grant should be committed directly towards training versus non-training programmatic expenses. Although grant funds can be used for a variety of eligible activities (e.g., costs for screening and placement, outreach, and curriculum development, among other activities), EPA prefers that the bulk of grant funds (60%) go toward training costs (i.e., personnel costs to

instructors and other direct costs of training).

The exact budget allocation for each program is expected to vary to some degree depending on a variety of factors and will be reflected in the EPA approved scope of work. For example, some programs may be able to commit more funds directly towards training while others may require supporting costs for travel or curriculum development. In the latter case, it is important to thoroughly explain the additional costs and fully justify the budget allocation in your application. Applicants are still encouraged to seek non-EPA supplemental funding and leverage additional funds to support non-environmental training costs whenever possible.

F.10. **Can a grant recipient conduct a training cycle in another language, e.g., Spanish?**

Yes, if the applicant chooses to serve a predominantly non-native English-speaking population (e.g., Spanish speaking residents), the applicant may choose to deliver training in that language. The applicant should be cautious and mindful that examinations for certifications may be in English, and as noted below there are requirements relating to U.S. citizenship or lawful permanent residents. Thus, the applicant should verify state, local, and/or federal certification requirements beforehand. Applicants should also provide details about how individuals receiving instruction in languages other than English will be able to secure employment - keeping in mind potential barriers that may arise.

Applications, and any accompanying partnership letters, must be submitted in English.

F.11. **Can a grant recipient provide training to individuals who are not currently legal residents of the United States?**

No. Costs for training individuals who are not citizens of the United States, the territories, and/or U.S. possessions, and/or lawfully admitted to the U.S. for permanent residency (i.e., Green Card holders), are unallowable in the Brownfields Job Training Program based on a policy decision to continue to apply the requirements in 40 CFR § 45.135(a).

F.12. **Can a grant recipient provide training to individuals under the age of 18?**

Yes, grant recipients may provide training to individuals under the age of 18, but the individuals should be at least 17 years old to enter a brownfields job training program. Please note that the Fair Labor Standards Act prohibits youth under the age of 18 from being employed in hazardous occupations. If providing training to individuals under the age of 18, it is important for grant recipients to follow child labor laws, as discussed by DOL at https://www.dol.gov/agencies/whd/YouthRules/young-workers/non-ag-16-17.

G. Community and Employer Partnerships

G.1. Am I required to inform the target community of my intention to apply for a Brownfields Job Training Grant before or during the preparation of my application?

EPA does not require applicants to inform their target community of their intention to apply for the grant; however, EPA strongly encourages applicants to do so. We find that applicants who hold a community meeting, notify the community about the proposed environmental training program prior to submission of an application, and work with and solicit feedback from diverse community constituents about the proposed program prior to submission, typically have stronger applications.

For example, working with the community and conducting ongoing, meaningful community involvement will usually help applicants score higher when their applications are evaluated because this often means their programs will better reflect the needs of the community and will have already started marketing their program within the community. Employers, workforce investment boards (WIBs), community colleges, and community-based organizations provide critical partnerships needed to deliver a successful training program – especially in light of the fact that grant funds may not be used to provide life skills training or social services which can be leveraged through these partnerships.

G.2. How can I get the target community involved in my proposed training?

To engage your target community in the proposed training program, try to participate in events or activities already scheduled in your target community (e.g., town hall meetings, neighborhood advisory council meetings, church functions, etc.). Be prepared to make an announcement or distribute flyers with information about your proposed training program. Another good idea would be to have a draft of your application available at the city's webpage or public library and encourage the community to provide comments.

G.3. What type of roles might community-based organizations play in my proposed training?

Community-based organizations can help you provide the non-environmental training (not covered under this grant) that may be required to help participants retain employment. Community-based organizations can play a number of valuable supporting roles including (but not limited to):

- Educational services, such as offering GED classes, life skills training, and recruitment assistance in the target community; and
- In-kind contributions: staff time, supplies, transportation, daycare services, equipment required for training, or providing a facility to host events or training.

G.4. **How do I get potential employers from my target community involved in my proposed training program?**

An essential part of any successful job training program is the involvement and participation of potential employers. After potential employers become aware of your proposed training program, encourage them to help in the design and delivery of your training program by:

- Inviting them to be part of your steering committee
- Helping with the design and development of the training curriculum
- Agreeing to provide on-the-job training or internships to trainees
- Providing resources to support training such as equipment
- Providing mentoring to trainees

EPA encourages to discuss their efforts to engage the employer community in their responses to the appropriate evaluation criteria.

G.5. **Where can I find information on other environmental job training programs and receive assistance in developing my own?**

See EPA's Current and Past Grantees Map for potential job training providers you can collaborate with.

Applicants may also find more information on environmental health and safety training at the National Institute of Environmental Health Science's (NIEHS) Worker Education and Training Program website at http://www.niehs.nih.gov/careers/hazmat.

The Technical Assistance to Brownfields (TAB) Communities grant recipients can also provide technical assistance to existing and prospective applicants interested in submitting an application for a Brownfields Job Training Grant. For a listing of these organizations and contact information, visit: www.epa.gov/brownfields/brownfields-technical-assistance. You may also find the TAB provider Brownfields Job Training Point of Contact for your Region in the Brownfields Job Training Grants Tip Sheet.

G.6. **Can I include language pertaining to local hiring needs in my Request for Proposals (RFP) solicitation?**

While creating an RFP, the CAR can include specific agency approved language to help encourage potential contractors/subcontractors to hire from local workforce development programs.

"*Portions of this project are being funded by a $XXX U.S. EPA (Insert Grant Type).* The Owner will more favorably evaluate contractors who hire staff that have gone through a local/state/federal workforce development program that teaches green remediation techniques/skills."

H. Administrative Costs

H.1. Are there limits on administrative costs for Brownfields Job Training Grants?

Yes. Under CERCLA § 104(k)(5)(E), recipients may use only use up to 5% of the amounts of EPA funds made available under a Brownfields grant to pay an administrative cost.

H.2. My organization's federally negotiated rate that is greater than 5%. Can we charge more than 5% for indirect costs?

No. We understand that many entities have negotiated indirect rates. However, the statutory authority for the Brownfields competitive grants caps the amount of grant funds that can be spent on administrative costs to 5%. The 5% cap of administrative costs is for all administrative costs, including indirect rates and other administrative expenses. For example, if an entity wants to charge their indirect rate to the grant, and their negotiated indirect rate is more than 5%, then they may charge their full negotiated rate but the total amount of allowable indirect costs is limited to 5% of the amount of the EPA grant. No other administrative expenses may be charged to the grant.

H.3. Does the term "administrative cost" include both direct and indirect costs?

Yes. Administrative costs include certain direct costs of grants administration and all indirect costs.

Direct Administrative Costs, including those in the form of salaries, benefits, contractual costs, supplies, and data processing charges, are costs that are not included in the recipient's indirect cost pool and are necessary to comply with the provisions of the Uniform Administrative Requirements for Cost Principles and Audit Requirements for Federal Awards at 2 CFR Parts 200.

Indirect Costs are those that are not specifically related to implementing the EPA award and are not readily identified with a specific project or organizational activity but incurred for the joint benefit of both projects and other activities. Overhead costs are a typical example of an indirect cost. Indirect costs are usually grouped into common pools and charged to benefiting objectives through an allocation process/indirect cost rate; 2 CFR § 200.414 and other provisions of the Uniform Guidance.

EPA's interpretation of the term "Administrative Cost" in CERCLA § 104(k)(5)(E) is based on similar limitations on administrative costs contained in sections 119(a)(1), (d)(4) and (d) and 319(h)(12) on the Clean Water Act.

H.4. **Does the limit on administrative costs for Brownfield Grants conflict with the requirement in 2 CFR § 200.414(C) for EPA to accept recipients' negotiated indirect cost rate?**

No. The regulation states that "[A] Federal awarding agency may use a rate different from the negotiated rate for a class of Federal awards or a single Federal award only when required by Federal statute . . .". As provided in CERCLA 104(k)(5)(E) administrative costs for Brownfield Grants are limited to 5% of the amount of EPA funds made available under a Brownfields Grant.

H.5. **What is the difference between a direct administrative cost and a programmatic cost?**

Direct Administrative Costs.

- Direct administrative costs include costs in the form of salaries, benefits, contractual costs, supplies, and data processing charges, incurred to comply with most provisions of the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* contained in 2 CFR Part 200 and 2 CFR Part 200, Subpart E.
- Direct administrative costs are defined in the applicable OMB Cost Principles Circular.
- As required by 2 CFR § 200.403(d), recipients must classify administrative costs as direct or indirect consistently and may not classify the same types of cost in both categories. Please review 2 CFR § 200.412, *Classifications of Costs*, for more information.

Programmatic Costs.

- EPA has determined that costs for activities that are integral to achieving the purpose of the cooperative agreement are considered as "programmatic" costs; not administrative costs.
- As required by 2 CFR § 200.403(d), recipients must classify administrative costs as direct or indirect consistently and may not classify the same types of cost in both categories. Please review 2 CFR § 200.412, *Classifications of Costs*, for more information.

H.6. **What are examples of eligible direct administrative costs?**

Eligible administrative costs subject to the 5% limitation include direct costs for:

Costs incurred to comply with the following provisions of the *Uniform Administrative Requirements for Cost Principles and Audit Requirements for Federal Awards* at 2 CFR Parts 200 and 1500 other than those identified as programmatic.

i. Record-keeping associated with equipment purchases required under 2 CFR § 200.313;
ii. Preparing revisions and changes in the budgets, scopes of work, program plans, and other activities required under 2 CFR § 200.308;
iii. Maintaining and operating financial management systems required under 2 CFR

§ 200.302;

iv. Preparing payment requests and handling payments under 2 CFR § 200.305;
v. Financial reporting under 2 CFR § 200.327;
vi. Non-federal audits required under 2 CFR 200 Subpart F; and
vii. Closeout under 2 CFR § 200.344 with the exception of preparing the recipient's final performance report. (Costs for preparing this report are programmatic and are not subject to the 5% limitation on direct administrative costs.)

H.7. **What are examples of allowable programmatic costs that are not subject to the 5% administrative cap?**

EPA has determined that direct costs for activities that are integral to achieving the purpose of the cooperative agreement are considered as "programmatic" costs, not administrative costs. Direct costs are defined at 2 CFR § 200.413. As required by 2 CFR § 200.403(d), recipients must classify administrative costs as direct or indirect consistently and may not classify the same types of cost in both categories. Please review 2 CFR § 200.412, *Classifications of Costs*, for more information.

The following are examples of eligible programmatic costs:

- Developing training curricula
- Compensating instructors
- Payments to program participants for transportation
- Rental of classroom space provided that same cost is not included in the recipient's indirect cost rate
- Outreach to recruit students
- Job placement activities
- Training for recipient employees including costs for attending the annual Brownfields All-Grantee Meeting and the Bi-Annual National Brownfields conference
- Costs for procuring contracts and contract administration
- Costs for managing subawards

Please refer to Appendix A of EPA's Subaward Policy for information on the difference between subawards and procurement contracts.

H.8. **Can unrecovered indirect costs in excess of the 5% limit on Administrative costs be used for voluntary cost share?**

No. Consistent with 2 CFR § 200.306(b)(4) and the definition of *Voluntary committed cost sharing* in 2 CFR § 200.1, Section III B. of the Request for Applications advises that voluntary cost shares may only be met with allowable costs. Unrecovered indirect costs normally may be used to meet cost share requirements, mandatory or voluntary, with prior approval of EPA's Award Official (or GMO post-award) as provided at 2 CFR § 200.306(c) and sections 6.0 and 6.5 of EPA's Indirect Cost Rate Policy and implementing Guidance. However, for costs to be allowable as cost share they must

conform to any statutory limitations on the allowability of costs as provided in 2 CFR § 200.306(b)(4) and 2 CFR § 200.408.

Indirect costs in excess of the CERCLA § 104(k)(5)(E)(i) 5% administrative cost limitation are unallowable.

H.9. **Can unrecovered indirect costs in excess of the 5% limit on administrative costs be counted towards leveraged funding other than voluntary cost share?**

Yes. As stated in Section 3.A.7. of the NOFO:
Leveraging is generally when an applicant commits to contributing its own additional funds or resources- either from its own assets or from third-party sources, such as private organizations or other federal grants- to support or complement the project they are seeking funding. This contribution goes above and beyond the financial support provided by the EPA grant funds awarded and is intended to amplify the project's impact. Leveraging demonstrates the applicant's ability to secure and utilize supplementary resources to achieve greater outcomes. These resources are different from legally binding Voluntary committed cost sharing as defined in 2 CFR § 200.1. Leveraged resources may materialize during the grant period of performance or after the grant has ended. Any leveraged funds/resources and their source must be identified in the Narrative. However, the leveraged funds/resources should not be included in the budget and the costs need not be eligible and allowable project costs under the EPA assistance agreement as would be the case for voluntary committed cost sharing, which is not allowed under this solicitation.

H.10. **If I name a consulting firm as a "partner" in the application is it proper to award that firm a sole source contract on that basis?**

No. All contracts for professional services in excess of the $10,000 micro-purchase threshold must be awarded competitively to the maximum extent practicable and in compliance with requirements to consider disadvantaged business enterprises set forth in 40 CFR Part 33. The market for consulting services is robust and it is unlikely that competition is impractical. Note that as required by 2 CFR § 200.320(a) recipients must distribute non-competitive micro-purchases equitably among qualified suppliers and the price must be reasonable. Recipients practices for distributing micro-purchases are also subject to requirements in 40 CFR Part 33 for participation of disadvantaged business enterprises in EPA financial assistance programs. Additional information regarding EPA policies on procurements under EPA financial assistance programs is available in our Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements.