

FY 2025 Midsize and Large Drinking Water System Infrastructure Resilience and Sustainability Program

Frequently Asked Questions

Last Updated 9/10/25

In accordance with EPA's Assistance Agreement Competition Policy (EPA Order 5700.5A1), EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about the announcement. However, consistent with the provisions in the announcement, EPA staff cannot meet with individual applicants to discuss draft applications, provide informal comments on draft applications, or provide advice to applicants on how to respond to ranking criteria. This document will be updated as EPA responds to questions about this funding opportunity from the public.

Applicants are responsible for the contents of their applications.

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A. Applicant Eligibility:

A1: Am I eligible to apply for the Notice of Funding Opportunity (NOFO)?

Eligible applicants are described in Section 2.A. of the NOFO, which states:

Only these types of organizations may apply:

- A public water system that serves a community with a population of 10,000 or more.

A2: What is a midsize community and what is a large community?

Section 3B. of the NOFO describes a midsize community as a community with a population between 10,000 and 100,000 individuals. A large size community is defined in this section as a community with a population of 100,000 individuals or more.

A3: Are municipalities eligible to apply for the NOFO?

Municipalities may only apply if they are applying to receive funds for an eligible public water system identified in the application. Eligible applicants are described in Section 2.A. of the NOFO, where it is stated: “Only these types of organizations may apply: A public water system that serves a community with a population of 10,000 or more.”

A4: Are tribal governments eligible to apply for the NOFO?

Tribal governments may only apply if they are applying to receive funds for an eligible water system identified in the application. The name of the water system on the area governed by the Indian Tribe must be clearly indicated as the applicant of the NOFO. Eligible applicants are described in Section 2.A. of the NOFO, where it is stated: “Only these types of organizations may apply: A public water system that serves a community with a population of 10,000 or more.”

A5: Are States eligible to apply for the NOFO?

States are not eligible to apply for this funding opportunity.

A6: Is there a cost share requirement for this announcement?

Yes, there is a cost share requirement for all applicants under this announcement. Section 2.B., Cost Sharing, of the NOFO states the following:

“Applicants must demonstrate in their proposal how it will meet the minimum cost share requirement of 10% of the total project cost (federal plus non-federal match) to be considered eligible. Selected recipients must comply with [2 CFR 200.306](#) when meeting a cost share requirement. All grant funds are subject to federal audit. Any restrictions on the use of grant funds also apply to the use of cost-share/match. **Applicants that do not demonstrate how they will meet the minimum cost-share/match requirement in their application submission will not be considered for funding.**”

A7: If I have questions regarding this announcement, will EPA respond to them?

EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about the announcement. Questions must be submitted via e-mail to (Resiliencygrant@epa.gov) by 11:59 PM Eastern Time, September 5, 2025. However, EPA staff will NOT discuss draft applications, provide informal comments on draft applications, or provide advice to applicants on how to respond to ranking criteria. Applicants are responsible for the contents of their applications (see Section 5 of the NOFO).

A8: Are homeowners or individual citizens eligible to receive funding under this opportunity?

Only public water systems that serve a community with a population of 10,000 or more can apply for this funding opportunity (see Section 2.A. Eligible Applicants, of the NOFO, and the response to question A1 of this document). Homeowners or individual citizens are not eligible to apply to this competitive opportunity.

A9. Are wholesalers eligible for these grants?

Yes, a water wholesaler who meets the definition of a “public water system” as that term is defined in 42 USC 300f(4)(A) that serves a community with a population of 10,000 individuals or more is eligible to apply for the Midsize and Large Resilience funding opportunity (see Section 2.A. Eligible Applicants, of the NOFO).

A10. Can you clarify the requirement that a water system must serve a population of 10,000 people or more? We are in search of funds to upgrade its potable water reservoir, which is considered transient, and serves 3,000 people per day. Does this qualify under this program?

Eligible applicants under this competitive announcement are public water systems that serve a community with a population of 10,000 or more. The eligibility requirement refers to the total number of individuals living in the community that is regularly served by the public water system. This must be the same population year-round, and the total population of more than 10,000 individuals should be verifiable by data such as census information (see Section 2.A. Eligible Applicants, of the NOFO).

A11. Can we apply for the Midsize and Large Drinking Water System Infrastructure Resilience and Sustainability Program? We purchase and distribute treated water, operate 3 wastewater reclamation facilities and several lift stations

A public water system that serves a community with a population of 10,000 individuals or more is eligible to apply for the Midsize and Large Resilience grant program (see Section 2.A. Eligible Applicants, of the NOFO). Please also see Section B below for questions and responses regarding project eligibility and Section 3.B. Program Goals and Objectives, of the NOFO.

A12. Would a public water system that is owned and operated by a state university that serves the university population, student housing, daycare centers and surrounding businesses be eligible for this program?

A public water system that serves a community of 10,000 or more individuals is eligible to apply for this grant program. This eligibility includes state owned public water systems (see Section 2.A. Eligible Applicants, of the NOFO).

A13: My agency is a large water system, National Priority Area 2, does our project have to be a minimum of \$2M to be eligible or can it be less than that?

The NOFO establishes a maximum amount of federal funds an applicant may request in the application of no more than \$2,375,000 in federal funds for NPA 2 (see Section 2 A.1., Other Eligibility Requirements). There is no minimum amount of federal funding that can be requested, however, the NOFO states “The EPA anticipates awarding approximately two assistance agreements under National Priority Area 2 ranging from approximately \$2,000,000 to no more than \$2,375,000.” See Section 1. Basic Information, F. Other Funding Considerations of the NOFO for additional information.

A14: I know that eligible public water systems must serve a population of 10,000 people or more, but does this mean that they have to directly serve them? I have a public water system that is interested that only directly serves 2,615 people, but they wholesale their water to two water districts. Between who they directly serve and those they Wholesale to, I believe they would serve a population of 10,000 people or more. Would they be eligible for this grant?

A water wholesaler who identifies as a public water system that serves a singular community with a population of 10,000 individuals or more is eligible to apply for the Midsize and Large Resilience grant. The community itself must contain a population of 10,000 individuals or more, and the population data should be publicly verifiable by information such as Census reports. Each of the population sizes of the communities identified above would fall under the Safe Drinking Water Act’s definition of small (a community with less than 10,000 individuals). Combining several distinct small communities will not make them collectively a midsize or large community.

A15: We are a regional, wholesale potable water utility who provides drinking water to our member counties and 1 city. Although we only have 11 connections, our facility provides water to approximately 300,000 residents/businesses. Could you please confirm that we would qualify as a large size community water system.

Water wholesalers must meet the definition of a public water system provided in order to qualify for this grant program. A public water system provides water for human consumption through pipes or other constructed conveyances to at least 15 service connections or serves an average of at least 25 people for at least 60 days a year.

A16: Are privately owned public water systems eligible to apply for this grant program?

Privately owned public water systems that meet the definition of a public water system in Section 2.A. Eligible Applicants, of the NOFO and serve a community of with a population of 10,000 or more are eligible to apply for this grant program.

B. Project Eligibility:

B1: What types of projects are eligible to apply for these funds?

The types of activities and services that are eligible for funding are described in Section 3.B. of the announcement, under “National Priority Areas.” As prescribed by the statutory requirements, funding must be used for the planning, design, construction, implementation, operation, or maintenance of a program or project that increases resilience to natural hazards and extreme weather events, or reduces cybersecurity vulnerabilities through:

- Conservation of water or the enhancement of water use efficiency
- Modification or relocation of existing drinking water system infrastructure made, or that is at risk of being, significantly impaired by natural hazards or extreme weather events, including risks to drinking water from flooding
- Design or construction of new or modified desalination facilities to serve existing communities
- Enhancement of water supply through watershed management and source water protection
- Enhancement of energy efficiency or the use and generation of renewable energy in the conveyance or treatment of drinking water
- Development and implementation of measures to increase the resilience of the drinking water system to natural hazards and extreme weather events; or to reduce cybersecurity vulnerabilities
- Conservation of water or the enhancement of a water supply through the implementation of water reuse measures
- Formation of regional water partnerships to collaboratively address documented water shortages

B2: If a business was to have a technology that would help bring clean water to communities and people in need, producing continuous supply, would they be able to apply for this grant?

Eligible applicants under this competition are public water systems serve a community with a population of 10,000 or more. For-profit organizations are not eligible to apply. See Section 2.A. of the NOFO and Section 3, Program Description

B3: The funding opportunity mentions that applicants would need to submit for intergovernmental review. Can you assist us please?

Please see [EPA Financial Assistance Programs Subject to Executive Order 12372 and Section 204 of the Demonstration Cities and Metropolitan Development Act and Section 401 of the Intergovernmental Cooperation Act](#) for additional information. State Single Points of Contact (SPOC) that identified EPA programs for review include: California, Indiana, Kentucky, Maryland, Missouri, Nevada, New Hampshire, Utah, and the U.S. Virgin Islands. No other SPOCs have selected EPA programs and activities subject to Intergovernmental Review for SPOC review.

B4: Since this program appears to be geared more towards drinking water, I was wondering if resiliency projects at a wastewater treatment plant would be eligible for funding?

No, resiliency projects at wastewater treatment plants are not eligible under this competitive announcement. See Section 3, Program Description, for examples of eligible activities.

B5: The project involves upgrading the security infrastructure at our water treatment plant by installing magnetic locks on all entry points throughout the facility. Could you please advise if this project would be eligible under your current grant guidelines?

Installation of locks, as indicated in Section 3, Program Description, page 8 of the NOFO, is an eligible project activity.

C. Threshold Issues:

C1: If I put charts and exhibits in my proposal can they be a smaller font than the 12-point font that is required of the body of the proposal?

The NOFO does not establish a required minimum 12-point font for the project narrative or charts and/or exhibits; however, the NOFO does indicate that readability is of paramount importance. Section 4. Application Contents and Format, Project Narrative, states in part “It is recommended that applicants use no smaller than a 11-point Times New Roman font with 1-inch margins. Readability is of paramount importance.”

C2: I have at least three (critical) infrastructure improvement projects programmed that satisfy the eligibility criteria of Section 3.B. Am I allowed to make the application with the intent, if I’m successful, of allocating grant dollars towards all three or must it be a single project only?

See Section 2.A.1, Other Eligibility Requirements for information on threshold criteria that all applications must meet in order to be considered eligible for evaluation against the review criteria in Section 6.B. For example:

- Applications for awards under National Priority Area 1 cannot request more than \$1,187,500 in federal funds; and applications for awards under National Priority Area 2 cannot request more than \$2,375,000 in federal funds. Applications that request more than the maximum amount of federal funds for the National Priority Area it addresses will not be reviewed.
- Applications must address one, and only one, of the two National Priority Areas listed in Section 3. Applications that address more than one National Priority Areas in a single application will not be reviewed.

- Applications must address at least one program or project for increasing drinking water system resilience to natural hazards, extreme weather events, or reducing cybersecurity vulnerabilities, as described in Section 3. Funding must be used for the planning, design, construction, implementation, operation, or maintenance of a program or project that increases resilience of drinking water systems to natural hazards and extreme weather events or reduces cybersecurity vulnerabilities.
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D. Evaluation Issues:

D1: Since staff expertise/qualifications are part of the scoring criteria upon which an award is based, can EPA elaborate on this review? Is this limited to new employees or contractors selected by the recipient? What further review of identified staff would be conducted for a successful recipient?

Regarding staff expertise and qualifications of key personnel, the EPA application review panel members will review the information provided by the applicant and conduct their scoring in accordance with the evaluation criteria in Section 6.B of the NOFO. The information reviewed by the panel includes the project narrative itself as well as biographical sketches and resumes submitted along with the narrative. If an applicant proposes future changes in key personnel after an application has been selected for funding, then the EPA Project Officer must approve of these changes after reviewing biographical and qualifications information provided by the applicant before the project can proceed or continue.

E. Timing and Logistics:

E1: When does EPA anticipate that awards will be announced?

EPA anticipates funding awards by Spring 2026, but this is only an estimate and not a guarantee.

F. Budget Concerns:

F1: The NOFO states a project period may be up to four years. Do you anticipate that this type of funding would be available in future years?

The funding announcement is based on EPA's current budget and funding availability under FY 2025. The Agency cannot make any commitment to future funding.

For more information, please read the EPA's Indirect Cost Guidance for Recipients of EPA Assistance Agreements at <https://www.epa.gov/grants/rain-2018-g02>.

G. Funding Clarifications:

G1: Will States be involved with the administering of these grants through their Drinking Water State Revolving Fund or will the public water systems be applying directly through the EPA?

Public water systems can apply directly to this funding opportunity (Opportunity #: EPA-OW-OGWDW-25-01). Funding will not be administered through the Drinking Water State Revolving Fund.

G2: Can this grant be combined with other federal funds/grants?

Yes, however Federal funds that may also be contributing toward a larger overall project are not combined with the federal funding request under this competitive announcement. Include on the Budget Information for Non-Construction Programs (SF-424A) the request for federal funds for this competitive announcement.

G3: I understand that under the Community Grants Program, EPA offers the possibility of a cost-share waiver for projects serving disadvantaged communities. Is a similar cost-share waiver available under the Midsize and Large Drinking Water System Resilience Program? If so, can you provide guidance on the application process and any required documentation?

There is no cost-share waiver for the Midsize and Large Drinking Water System Infrastructure Resilience and Sustainability Program, NOFO EPA-OW-OGWDW-25-01.

G4: Are state grant funds or utility revenue allowable sources for the 10% non-federal cost share?

Yes, as long as these sources of funding comply with 2 CFR 200.306. See 2 CFR 200.306(b) "For all Federal awards, the Federal agency or pass-through entity must accept any cost sharing funds (including cash and third-party in-kind contributions, and also including funds committed by the recipient, subrecipient, or third parties) as part of the recipient's or subrecipient's contributions to a program when the funds: (1) Are verifiable in the recipient's or subrecipient's records; (2) Are not included as contributions for any other Federal award; (3) Are necessary and reasonable for achieving the objectives of the Federal award; (4) Are allowable under subpart E; (5) Are not paid by the Federal Government under another Federal award, except where the program's Federal authorizing statute specifically provides that Federal funds made available for the program can be applied to cost sharing requirements of other Federal

programs; (6) Are provided for in the approved budget when required by the Federal agency; and (7) Conform to other applicable provisions of this part.”

G5: What is the minimum grant request that is allowable for funding?

There is no minimum amount of federal funding that can be requested, however, the NOFO states in Section 1.F, Other Funding Considerations “The EPA anticipates awarding approximately four assistance agreements under National Priority Area 1, ranging from approximately \$1,000,000 to no more than \$1,187,500.” and “The EPA anticipates awarding approximately two assistance agreements under National Priority Area 2 ranging from approximately \$2,000,000 to no more than \$2,375,000.”

Section 2.1, Other Eligibility Requirements states: “Applications for awards under National Priority Area 1 cannot request more than \$1,187,500 in federal funds; and applications for awards under National Priority Area 2 cannot request more than \$2,375,000 in federal funds. Applications that request more than the maximum amount of federal funds for the National Priority Area it addresses will not be reviewed.”

G6: Does the grant program allow for reimbursement of previous work (that is identified as eligible according to the Notice of Funding document)? If so, what is the allowable timeframe for reimbursement?

The allowability of pre-award costs are governed by 2 CFR 200.458 and 2 CFR 1500.9.

§ 200.458 Pre-award costs.

Pre-award costs are those incurred before the start date of the Federal award or subaward directly 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. These costs are allowable only to the extent that they would have been allowed if incurred after the start date of the Federal award and only with the written approval of the Federal agency. If approved, these costs must be charged to the initial budget period of the Federal award unless otherwise specified by the Federal agency or pass-through entity.

§ 1500.9 Revision of budget and program plans.

Pre-award Costs. EPA award recipients may incur allowable project costs 90 calendar days before the Federal awarding agency makes the Federal award. Expenses more than 90 calendar days pre-award require prior approval of EPA. All costs incurred before EPA makes the award are at the recipient's risk. EPA is under no obligation to reimburse such costs if for any reason the recipient does not receive a Federal award or if the Federal award is less than anticipated and inadequate to cover such costs.

EPA defines pre-award costs as costs incurred prior to the award date, but on or after the start date of the Budget period and Period of performance as those terms are defined in 2 CFR 200.1. Under EPA's interpretation of 2 CFR 200.308(e)(1) and 2 CFR 1500.9 all eligible costs must be incurred during the budget/ performance period as defined by the start and end date shown on the grant award to receive EPA approval. This interpretation is implemented in a grant-specific Term and Condition entitled "Pre-award Costs" which is included in all awards when the applicant has incurred EPA approved costs prior to award.

G7: Are we able to use employee time for in-kind match towards the overall matching funds total?

Employee time that otherwise meets the requirements in 2 CFR 200 can be used for non-federal cost share/match.

H. Miscellaneous:

H1: Is EPA available to discuss the program and answer questions from an applicant on achieving the program objectives prior to submitting an application?

As described in Section 1. of the NOFO, EPA staff cannot meet with individual applicants to discuss draft applications. See Section 1.E., Agency Contact Information:

"Note to Applicants: In accordance with EPA's Assistance Agreement Competition Policy (EPA Order 5700.5A1) and consistent with the provisions in the announcement, EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about any of the language or provisions in the announcement. In accordance with the Policy, EPA cannot meet with individual applicants to discuss draft applications, provide informal comments on draft applications, or provide advice to applicants on how to respond to ranking criteria. Applicants are responsible for the contents of their applications. Please note that applicants should raise any questions they may have about the solicitation language to the contact identified above as soon as possible so that any questions about the solicitation language may be clarified prior to submitting a proposal. In addition, if necessary, EPA may clarify threshold eligibility issues with applicants prior to making a final eligibility determination."

H2: If a design engineering firm has been previously selected through a competitive, qualifications based selection process for the design of the work being submitted for grant funding, can that engineering firm assist with the development of a grant application, to include assistance with the development of the cost estimate used in the grant application and still be eligible perform the design work they were already competitively selected for?

Please see Section 4.B Applicants Using Contractors and associated guidance. “Applicants must compete contracts for services and products, including consultant contracts, and conduct cost and price analyses, to the extent required by the [procurement provisions](#) of the regulations at 2 CFR Part 200.

Do not name a procurement contractor (including a consultant) as a “partner” or otherwise in your application unless the contractor has been selected in compliance with competitive procurement requirements. If an applicant selected for award has named a specific subrecipient, contractor, or consultant in the application, it does not relieve the applicant of its obligations to comply with subaward and/or competitive procurement requirements.

The EPA will not consider the qualifications, experience, and expertise of named subrecipients and/or named contractor(s) during the application evaluation process unless the applicant provides documentation that it has complied with these requirements.

For additional guidance, applicants should review [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#), [EPA’s Subaward Policy](#), and [EPA’s Subaward Policy Frequent Questions](#).”

H3: How many applications can I submit for this funding opportunity?

Applicants may submit more than one application package under this announcement as long as each one is separately submitted and addresses only one National Priority Area. The cover page of each application package must clearly indicate the National Priority Area addressed in the application. If an applicant submits an application addressing more than one National Priority Area, it will be rejected.

H4: Is there any more information, or examples, which could be shared on the requirement listed below, in particular with regard to a cybersecurity vulnerability- “Applications must include documentation prepared by a Federal, State, regional, or local government agency of the natural hazard risk, risk for extreme weather events, or potential cybersecurity vulnerability to the area where the proposed program or project is to be located”

Applicants may utilize CISA and EPA past and current alerts (www.epa.gov/waterresilience/cybersecurity-response) as supportive documentation to address cybersecurity vulnerabilities. Applicants may use the FBI’s [Industry Alerts](#) (www.ic3.gov/CSA) and annual [cyber reports](#) (www.ic3.gov/).

H5: Can a university work with an eligible public water system as a partner, contractor, or subawardee on the proposed project?

Universities are not an eligible applicant of this grant program. Only a public water system that serves a community of 10,000 or more can apply. See Section 2.A. of the NOFO. Eligible public water systems can compete for contracts and subaward with any entity that meets the

competitive procurement provisions of the regulations at [2 CFR Part 200](#) and complies with [EPA's subaward policy](#). See Section 4B. Applicants Using Contractors of the NOFO.