

On December 3, 2025, EPA's Office of Brownfields & Land Revitalization held a live webinar to assist applicants with preparing the **Narrative portion** of their applications for the Fiscal Year (FY) 2026 **Multipurpose Grants, Community-wide Assessment Grants, Assessment Coalition Grants, and Community-wide Assessment Grants for States and Tribes**. Participants' questions and EPA's responses are included below. Note, responses may include additional information than what was provided during the webinar. This transcript (v2) was updated to include the remaining questions and answers, and minor clarifications.

Note that **general application submission, the Application Information Sheet, and Threshold requirements** were covered in the recordings available on the [MARC Grant Application Resources – “Open Solicitations”](#) webpage under Pre-Recorded Videos on Minimum Grant Requirements.

If you have general questions about EPA's Brownfields Program, the content of the pre-recorded videos, or questions about a specific site for which you are seeking funding, please contact your Regional Brownfields Contact listed in Section 1.E. of the Guidelines. If you have questions on how to submit an application through [www.grants.gov](#), please visit the “APPLICANTS” tab on the grants.gov website for information.

GENERAL QUESTIONS & ANSWERS	
Q: Where can I find the recording and the presentation?	A: A copy of the presentation and the webinar recording with closed captioning are available on the MARC Grant Application Resources – “Open Solicitations” webpage (see Grant Guideline Outreach Webinars - Narrative Ranking Criteria).
Q: Will a summary of the links from the chat be made available?	A: All the links provided in the webinar chat are also in the presentation slides. To access the respective links, please download a copy of the slides from the MARC Grant Application Resources – “Open Solicitations” webpage.
Q: How can I be added to the EPA Office of Brownfields and Land Revitalization listserv?	A: Please sign up for the EPA Brownfields listserv here: https://lp.constantcontactpages.com/su/SVbfoYx/BrownfieldsListserv .
Q: I'm not seeing RLF open solicitations, are they not available as of now?	A: EPA will not issue a request for applications for Revolving Loan Fund (RLF) Grants in FY 2026. However, RLF recipients who have an open RLF cooperative agreement and meet other eligibility criteria will have an opportunity to request RLF Supplemental Funding. EPA anticipates issuing the FY 2026 RLF Supplemental Funding Instructions in winter 2026.
Q: Does the 4-year project period begin upon award announcement or following signing of the cooperative agreement?	A: Neither. The four-year project period begins on the date established in the grant award for the period of performance.
Q: What are “feasible” reuse activities?	

A: A feasible site reuse strategy is a plan for reusing a property that is possible or practical for the community to implement. Knowing the redevelopment reuse option(s) for the site will better inform the selection of an appropriate cleanup remedy and help to ensure the site remains protective of human health and the environment after it is redeveloped.

Q: Do the three Application Information Sheet pages count toward the overall page limit?

A: No. The Application Information Sheet has a three-page limit. These three pages are not included as part of the Narrative section's 10-page limit (for Community-wide Assessment Grants) or 12-page limit (for Multipurpose Grants, Assessment Coalition Grants, and Community-wide Assessment Grants for States and Tribes).

Q: What is the difference between Narrative and Review Criteria?

A: The narrative criteria in Section 4 of the Guidelines describe what information applicants should provide in their narrative. The review criteria in Section 6 are used by EPA's reviewers to evaluate applicants' responses to the narrative criteria.

General Eligibility

Q: Can you clarify the liability portion? For example, if we, a nonprofit organization, acquire a brownfield property but did not CAUSE the contamination, we are still legally responsible for the contamination, but we are still eligible to apply for these funds, correct?

A: Eligible entities that did not cause or contribute to the contamination may be eligible for funding. Brownfield Grant funding cannot be used at sites for which the grant recipient is a potentially responsible party (PRP) under CERCLA. Please see [FAQ Q.4.](#) for more details.

Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for questions on eligibility. If selected for Multipurpose or Assessment Grant funding, EPA will determine eligibility for site-specific assessment and cleanup activities throughout the project period.

Q: Does the applicant have to own the property being proposed? For example, can a non-profit development corporation apply for a property owned by a local hospital?

A: It depends. Site ownership is required for cleanup. If you are applying for a Multipurpose Grant or a Cleanup Grant, you must own the property that you will remediate using grant funds. Please see the corresponding Guidelines for details. Site ownership is not required for Assessment Grants. However, recipients must be able to access the site to perform assessment activities, such as through a document providing consent to access the site signed by the property owner.

The [FY 2026 FAQs](#) expand on the “ownership” requirement as well as discuss other types of ownership arrangements that EPA may approve as being a “functional equivalent of ownership” for Brownfields Multipurpose and Cleanup grants.

Q: Can we apply as a regional economic development organization since we are a 501(c)(6)?

A: It depends. Only nonprofit organizations described in section 501(c)(3) of the Internal Revenue Code are eligible for Multipurpose and Assessment Grants. 501(c)(6) organizations may be eligible for a Cleanup Grant. Please contact the Brownfield representative listed at

the end of this presentation or in Section 1.E. of the Guidelines for specific questions related to eligibility. They can assist you with determining if your organization qualifies as an eligible entity type.

Q: Can education providers be lead applicants?

A: It depends on whether the organization is an eligible entity type listed in Section 2.A. of the Guidelines. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for specific questions related to eligibility.

Q: Could you please explain the difference between “Target Area” and “Site”?

A: A target area is the grant’s area of focus to perform eligible activities. Examples of a “target area” include, but are not limited to, a neighborhood, district, corridor, or census tract. A priority site is a specific property where the applicant plans to conduct work that is located within the target area.

Q: In recent application years, citing data from the EJ Screen tool (since disabled) was encouraged. Is there any specific tool or data set that is required or encouraged to be cited for this application cycle?

A: No, there is not a specific tool or data set that is required for the FY 2026 application cycle. EPA encourages applicants to use free geospatial mapping tools and other available sources, such as the census, local studies, and third-party reports.

Q: Since some of the environmental justice screening tools have been taken offline, can we still use that data if it was previously saved?

A: EPA encourages applicants to use free, publicly available geospatial mapping tools and data. If a tool is no longer available, applicants may use other available sources, such as the census, local studies, and third-party reports.

Q: How do we check/know if our organization has ever received a Brownfields Grant?

A: If you are unsure whether your organization has ever received a Brownfields Grant, please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for assistance.

Q: We have an FY 2023 MAC Grant. Does this need to be 70% spent by October 1, 2025, to be eligible?

A: It depends on the grant(s) you currently have. Please use the [FY 2026 Eligibility Chart for Existing Recipients](#) to determine if you are eligible and the corresponding drawdown requirement. Note, the drawdown requirement for all grant types must have been met by October 1, 2025.

Q: Please define “site-specific cleanup planning.” Is that related to work that can inform the cleanup action (e.g., site planning to determine land uses, impervious surfaces), or the actual activities related to excavation, groundwater treatment, etc.)?

A: Site-specific cleanup planning activities are closely tied to the cleanup decision for an individual brownfield site, such as when the planning activity is necessary to help determine the feasibility of site cleanup or reuse option(s) for redevelopment. Planning to determine

land uses for a particular site is one example of site-specific cleanup planning. Excavation and groundwater treatment are examples of remediation activities (i.e., not planning).

General planning activities (i.e., planning activities that are not site-specific) are eligible under Multipurpose and Assessment Grants. Examples of general planning activities are outlined in EPA's [Planning Information Sheets](#) and in FAQ G.3. Cleanup Grant funding is typically limited to site-specific planning only, and more details about this are provided in FAQ G.4.

Grants.gov Submission/Federal Forms – no questions were submitted for this category.

Multipurpose Grants

Q: May State-funded brownfield assessments be used as prior planning/outreach justification for submission of a Multipurpose Grant?

A: EPA does not require a “justification” to apply for Multipurpose Grants. Multipurpose Grants are appropriate for communities that have prior or ongoing community engagement efforts that have resulted in identifying a defined and discrete area where revitalization efforts are focused.

In the Narrative, Multipurpose Grant applicants are asked to describe their priority site(s), why the site is prioritized for assessment, cleanup, and/or reuse, and how the community has been meaningfully involved in efforts to address brownfield sites in the target area, including the priority site(s). If State-funded brownfields assessments or other planning or outreach activities took place, it may be relevant to include those in the response.

Q: Can a site for a Multipurpose Grant consist of four vacant lots grouped as one site? All sites have a completed Limited Phase II (one Phase II for all four lots) and a draft ABCA for all four lots together.

A: Yes, an applicant may define a property with multiple parcels (or even an area with a cluster of multiple properties) as a single site, or they may define each parcel/property as an individual site. Please see [FAQ L.10.](#) for more details. Note that for Multipurpose Grants, recipients must complete at least one of each of the following within the grant period of performance: Phase II environmental site assessment, site cleanup, and an overall revitalization that includes a feasible reuse plan for one site.

Q: For a Multipurpose Grant, assuming the grantee has ownership of one site for cleanup at the time of grant submission, is it possible for them to acquire another site for cleanup during the period of performance? In other words, under a Multipurpose Grant, do you have to own all sites you plan to conduct cleanup activities on at the time of application submission or just one?

A: For a Multipurpose Grant, an applicant must own at least one brownfield site(s) within their proposed target area where cleanup activities may be conducted by the application deadline (January 28, 2026), and may acquire another site(s) to be cleaned up with grant funds after the application deadline. Recipients may not use Multipurpose Grant funds for the remediation of a brownfield site unless they own the site and are not responsible for the contamination.

Q: For Multipurpose Grants where the cleanup costs are yet to be determined, what basis for cleanup costs are acceptable?

A: Some ways to identify cleanup cost estimates may include, but are not limited to, a Phase II report, a draft ABCA, or reuse plans.

Q: Under criterion 1.b. Description of the Priority Brownfield Sites, recipients can only use funds if they own the site and are not responsible for contamination. What if they do not own the site, but were responsible 40+ years ago for contamination?

A: Sites are only potentially eligible for Brownfields funding if the applicant is not a Potentially Responsible Party (PRP). There are some exemptions to CERCLA liability for Indian Tribes, Alaska Native Village Corporations and Alaska Native Regional Corporations, and Property Acquired Under Certain Circumstances by Units of State and Local Government. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines if you have questions about applicant/site eligibility.

With respect to ownership requirements, site ownership is not required for assessment activities. Multipurpose Grant recipients may only expend grant funds for the remediation of a brownfield site that the recipient owns. Multipurpose Grant applicants must own a brownfield site(s) within their target area where cleanup activities may be conducted by January 28, 2026 (see Section 2.B.(4) for details). EPA will determine eligibility for site-specific assessment and cleanup activities throughout the project period.

Q: Can you expand on what types of community engagement activities can be funded with a Multipurpose Grant? Can this be around neighborhood-scale brownfield revitalization or is this generally understood as site-specific engagement and design? What percentage of the overall budget can be proposed for community engagement?

A: Community engagement activities may include, but are not limited to, visioning sessions, public meetings, and community mapping. Engagement activities must be related to a brownfield site or an area with one or more brownfield sites. Additionally, there is no set percentage of the budget that can be spent on community engagement. However, please note that for Multipurpose Grants, applications that allocate at least 70% of the funds for tasks directly related to site-specific work, including site assessments, remediation, and associated tasks (with at least 25% of the total award amount designated for tasks directly associated with site remediation) will be evaluated more favorably.

Community-wide Assessment Grants

Q: For a city applying, does the target area need to be smaller than the city boundary? Can the Community-wide Assessment Grant be used to help identify priority sites within a target area? Or do we need priority sites identified in order to apply?

A: No, the target area does not have to be smaller than the city boundary. EPA defers to the applicant on defining their target area, so it may be as large as the city boundary if you so choose.

Yes, identifying additional sites, inventory activities, or creating a list or database of brownfield properties is an eligible grant expense. Per the Narrative criteria, at least one priority site should be identified in the application.

Q: If we are pursuing a Community-wide Assessment Grant, can a co-applicant be the owner of a potential site?

A: Community-wide Assessment Grants only have one applicant. Assessment Coalition Grants include a lead member and two to four non-lead coalition members. Neither grant type allows for “co-applicants.” Assessment Grant recipients do not have to own the sites being assessed, but they must be able to access the site to perform assessment activities. If your organization collaborates with another entity that owns a site you wish to assess, that may be acceptable as long as you have site access, and the site is within your geographic boundary and/or jurisdiction. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for specific questions related to eligibility.

Q: Per the Guidelines and EPA’s website, EPA may select 70 Assessment Grants for a total of \$35 million this year. How does that compare with the past couple of years?

A: In FY 2025, a total of 99 Community-wide Assessment Grant applications were selected for award. In FY 2024, a total of 61 Community-wide Assessment Grant applications were selected for award.

Q: We are a regional organization. We have an open Assessment Grant that we were awarded earlier this year. Can we apply for a new Assessment Grant through the Community-Wide Assessment Grants solicitation? (I see that recipients with a Community-wide Assessment Grant for States and Tribes cannot, but it looks like other applicants can. Please clarify.)

A: No, you are likely not eligible. Community-wide Assessment Grants have a 70% drawdown requirement for all open Assessment and Multipurpose Grants. This means to be eligible to apply for another Community-wide Assessment Grant, your organization must have drawn down at least 70% of the funding on the open grant by October 1, 2025. Since your grant was recently awarded, you will likely not meet the drawdown requirement and will not be eligible for an Assessment Grant this year. See threshold criterion 2.B.(3) for details.

Assessment Coalition Grants

Q: The NOFO says the applicant must have at least two, but not more than four, non-lead coalition members, so the total is three, correct?

A: Yes, an Assessment Coalition may have two, three, or four non-lead members. Including the coalition lead, the total number of members may be three, four, or five.

Q: Is a multi-county regional commission considered a coalition?

A: Without further information, likely not. Based on your question, it seems as though the Commission is a single entity. An Assessment Coalition is comprised of one lead entity that partners with two to four entities. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines for specific questions related to eligibility.

Q: Can a county/Metropolitan Planning Organization apply for a Coalition Grant with one or more cities/towns within their jurisdiction? Or do they have to be in a different geographic area?

A: Yes, a county or Metropolitan Planning Organization can apply to lead an Assessment Coalition and can have two to four non-lead members that are cities or towns within their jurisdiction. The lead member must identify at least one target area within their geographic boundary/jurisdiction, as well as identify at least one target area in each non-lead member's geographic boundary/jurisdiction. The geographic boundaries/jurisdictions of the coalition members can overlap (i.e., cover the same geographic area); however, the target areas may not overlap. The target areas must be in at least three distinct municipalities or jurisdictions (e.g., town, city, or Tribe).

Q: Can you clarify for Coalition Assessment Grants if target areas can be different areas/neighborhoods within the same city or county, even if the coalition members have different jurisdictions? For example, I represent a county and am considering applying to be the lead with two cities and a nonprofit also joining the coalition. Would we be able to have multiple target areas in the same city?

A: Yes, target areas for Assessment Coalition members may include different areas/neighborhoods within the same city or county if the geographic areas (i.e. the jurisdictions) for the members overlap. The target areas themselves may not overlap.

At least three target areas must be in distinct municipalities or jurisdictions (see the threshold criterion under Section 2.B.(2) for details). For example, one target area could be within City A, a second target area within City B, a third target area in a third city within the county leading a coalition, and a fourth target area for the nonprofit also in City A. See [FAQ J.16.](#) for other examples of how an applicant may meet this requirement. Contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines if your situation seems unusual (e.g., your county does not have three cities/towns within it or only has census designated places or unincorporated communities).

Q: A slide stated that entities with an open Assessment Grant that can demonstrate they have drawn down 70% of funding are eligible to be a non-lead member of a coalition grant. Does this mean they cannot be a lead member of a new Assessment Coalition Grant?

A: No, the 70% drawdown requirement for open Multipurpose or Assessment Grants applies to both lead and non-lead members of an Assessment Coalition. This means that if an entity has an open Multipurpose or Assessment Grant and they cannot demonstrate that they had drawn down 70% of funding by October 1, 2025, that entity is ineligible to be a lead or a non-lead member of an FY 2026 Assessment Coalition.

Q: Is a letter of commitment or MOA from coalition partners required for the coalition application?

A: Yes, please see threshold criterion 2.B.(5) in the Assessment Coalition Grant Guidelines. As a reminder, today's webinar is focused on Narrative Criteria for Multipurpose and Assessment Grants. For general submission, Application Information Sheet, and threshold requirements, please visit EPA's website to access the recorded training and presentations.

Q: Regarding Assessment Coalition Grants - there is language about how the coalition lead needs to have “legal authority” to expend grant funds on behalf of coalition members outside the lead member's jurisdiction. It seems unlikely that ‘laws or ordinances’ exist that stipulate this authority. Would a memorandum of understanding between the lead and coalition members suffice?

A: Without further information, likely not. EPA would need to review the memorandum to determine if it meets the requirements. Some cities/towns/counties have laws or ordinances that permit them to expend funds on properties that border their jurisdiction. EPA may accept other documentation that demonstrates the legal ability to expend funds on behalf of non-lead members, or if no documentation exists, a legal opinion may be accepted. Please see [FAQ J.18.](#) for details and reach out to your Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines with specific eligibility questions. We encourage you to submit your documentation or legal opinion to EPA for review before submitting the application if you want to confirm that it meets the eligibility requirement.

Q: We have an established Brownfields Coalition consisting of three Economic Development Districts (EDD). Each EDD has defined target areas (multi-county). This coalition has been established since 2005, and we've successfully received several Assessment and Cleanup awards over the last 20 years. The lead organization is a 501(c)(3) nonprofit. The other two coalition members are also 501(c)(3) nonprofits. The lead member has always been the entity to receive EPA awards because the other two members do not have the capacity to manage EPA grants. The lead organization has always been authorized to spend funds in the other two coalition target areas (but we've never had to show documentation of how we are considered legally authorized to spend funds in the other coalition areas). Under these new Guidelines, as I understand it, the lead organization is eligible. Is there anything I'm missing in the Guidelines that will make the coalition ineligible to apply as a coalition?

A: Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines so we can more adequately address your question, as it is very fact-specific, and we want to make sure to give you the most accurate answer.

Q: How many priority sites should be included in the application for Coalition Assessment and Community-Wide Assessment Grants?

A: In the application, Assessment Coalition applicants should identify at least one priority site in each coalition member's target area. Community-wide Assessment Grant applicants should identify one or more priority sites.

Community-wide Assessment Grants for States & Tribes

Q: Under Narrative Criteria 1.c. *Identifying Additional Sites*, how does one show prioritization criteria for sites in an MSA and sites outside of an MSA? Since all sites are in one or the other, if you prioritize one, doesn't that automatically exclude the other?

A: For CWAGST Grants, applicants are asked to identify the criteria for prioritizing additional sites, including criteria that consider new communities that have not previously benefited from Brownfields Grant Resources. State and Puerto Rico applicants only (i.e., does not apply to Tribes, or eligible Tribal entities) are also asked to consider whether a site is in an MSA or

non-MSA. Besides prioritizing new communities, applicants may describe a plan to balance sites in MSAs vs. non-MSAs and any other priorities you deem relevant for selecting additional sites.

Q: For the CWAGST key features (slide 14), can you elaborate on the “target areas of higher and lower population densities” point? Are there specific population requirements for the target areas?

A: The requirement to consider populations in areas with higher or lower populations applies to State applicants from Delaware, District of Columbia, Massachusetts, New Jersey, Rhode Island, and territory applicants (other than Puerto Rico). That is because these states/territories have either only MSAs or only non-MSAs, so they cannot identify sites in both. There is no specific population amount associated with this requirement.

Q: For CWAGST applicants under Narrative Criteria 1.b. *Description of Priority Sites*, is there any benefit to describing more than five priority sites?

A: No, the requirement is to describe at least five priority sites. Identifying more than five priority sites does not mean a response will necessarily be evaluated more favorably.

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS & ANSWERS

Q: For Island projects, can the geographic boundary be the “Hawaiian Archipelago”?

A: The geographic boundary may be the jurisdiction of a unit of government or an area of service for a nonprofit organization. Please contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the Guidelines if you have specific questions about what constitutes your organization’s geographic boundary.

Q: Can you provide more details on how to put together the target area?

A: A target area is the grant’s area of focus for eligible activities. Examples of what may constitute a target area include, but are not limited to, a neighborhood, district, corridor, or census tract.

Multipurpose Grant applicants must only identify one target area, and the target area may not include communities that are located in distinctly different geographic areas.

Community-wide Assessment Grant applicants may identify one or more target areas.

Assessment Coalition Grant applicants must identify a target area for each member in the coalition, the target areas may not overlap, and they must be in at least three distinct municipalities or jurisdictions (e.g., town, city, or Tribe). Community-wide Assessment Grant for State and Tribe applicants must identify at least 3 target areas.

Q: All our brownfields parcels are within one census tract, but should our target area include adjacent census tracts where residents live, but where no work will be performed?

A: EPA cannot help an applicant strategize how they should define their target area(s). Please see the response to the question above for more details about EPA’s expectations with respect to target areas and how many are required for different grant types. You may contact the Brownfield representative listed at the end of this presentation or in Section 1.E. of the

Guidelines for specific questions related to eligibility, or general questions about the Guidelines.

COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

Q: Slide 38 states that a response to criterion 2.a. *The Community's Need for Funding* may only earn up to two points if the inability to draw on other sources of funding is not because the community has a small population or is low-income. Are you looking for a matching component or more of an assessment of financial capacity?

A: No, EPA is not looking for a match or cost share. Under criterion 2.a. *The Community's Need for Funding*, EPA is looking for the applicant to describe why the community is unable to draw on other sources of funding to carry out environmental assessment or remediation activities, and subsequent reuse in the target areas. If the response does not describe how the community is small and/or low-income, resulting in their inability to draw on other sources of funding, the response may only earn up to two points.

Q: What is the threshold/cutoff for “small” population?

A: There is no statutory definition of what constitutes a “small” population. EPA leaves it to the applicant to make their case as to why the community is small. However, the Brownfields Program considers communities of 10,000 people and less as “micro” communities, 15,000 people and less as “small” communities, 50,000 people and less as “rural,” and less than 100,000 people as “nonurban.” Communities with less than 50,000 in population may be considered small.

Q: Under criterion 2.b. *Health or Welfare of Sensitive Populations* (on slide 39), can we only discuss one (health or welfare)?

A: No. While only health or welfare is required to be discussed to potentially receive full points in response to this criterion, if an applicant has relevant information on both health and welfare, both may be addressed in the response.

Q: Can you explain the difference in the definition of sensitive populations for this competition? It appears minorities were excluded from the definition, but are still listed in the referenced material. If you list minorities as a sensitive population, are you able to get full points?

A: Sensitive populations are defined in the FY 2026 Guidelines as “those populations that are likely to experience elevated health risks from pollution, including populations based on age (young children and the elderly), pregnant women, and serious disease burden (such as, high rates of cancer, asthma, chronic respiratory disease, coronary heart disease, low birth weights, etc.), as well as low-income populations.” Past Guidelines did not explicitly define sensitive populations and referenced statutory language from CERCLA § 104(k)(6)(C)(x). Per the FY 2026 Guidelines, the Brownfields Program will implement this provision in accordance with all applicable law. Applicants should use the FY 2026 definition of sensitive populations in response to the narrative criteria to potentially receive full points.

TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS QUESTIONS & ANSWERS

Q: Are HAZMAT suits an eligible expense under a Brownfields Grant?

A: Yes, appropriate safety gear or personal protective equipment (PPE) that is necessary to address site contamination, such as HAZMAT suits, is an eligible expense under Brownfields Multipurpose, Assessment, and Cleanup Grants.

Q: In the budget table, does a salary for a coalition member's staff for programmatic or administrative work belong under "personnel/fringe" or "other" as a subaward?

A: The personnel/fringe line is for employees of the applicant's organization. If the salary will be paid to a non-lead member's employee, this may be provided via a subaward from the lead member to the non-lead member (assuming the non-lead member is an eligible entity to receive a subaward, such as a non-profit, an Institution of Higher Education, or a unit of government). Subawards belong on a separate line in the "other" budget category. Note that successful applicants may only use up to 5% of the total amount of EPA funds for administrative costs (direct costs for grant administration and indirect costs).

Q: Can we start soliciting bids now as long as we don't select a contractor (to get our estimated costs)?

A: Assuming the aggregate value of the procurement transaction exceeds the simplified acquisition threshold (\$350,000 for grants awarded on or after October 1, 2025), the answer is likely no. As described, the process you would be following to obtain estimated costs seems to be inconsistent with the procurement standards in 2 CFR Part 200 (which are applicable to Brownfields Grants, regardless of when you procure your contractor). Specifically, 2 CFR 200.324(a) requires recipients to perform a cost or price analysis for every procurement transaction over the simplified acquisition threshold, which includes as a starting point, "mak[ing] independent estimates before receiving bids or proposals." In other words, you are supposed to have independent cost estimates before receiving bids for services, supplies, and/or equipment.

Q: Should inventory costs be a minority of the budgeted tasks?

A: There is no set percentage of the budget that can be spent on creating an inventory of brownfield sites. However, please note that depending on the grant type, a percentage of the work must be for tasks directly associated with site-specific work for the response to the *Cost Estimates* criterion to be evaluated more favorably. For Community-wide Assessment Grants, this is at least 40% of funds. For Assessment Coalition Grants, this is at least 60% of funds. For Multipurpose Grants, at least 70% of the funds should be for tasks directly related to site-specific work, including site assessments, remediation, and associated tasks (with at least 25% of the total award amount designated for tasks directly associated with site remediation).

Q: Can you define indirect costs and how they are calculated?

A: FAQ O.2. defines indirect costs as 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.

Please review [EPA's Indirect Cost Policy for EPA Assistance Agreements](#) and refer to Module 4 of the [How to Develop a Budget Training](#). Module 4 defines and provides examples of indirect costs and explains how to calculate them for inclusion in the budget for an EPA financial assistance agreement. Upon reviewing these resources, if you still have further questions, please contact the Brownfield representative listed at the end of the presentation or in Section 1.E. of the Guidelines.

Q: The Administrative Cost Column is new in the sample budget table. If Administrative costs will not be used, may this column be deleted?

A: Yes, columns may be added or deleted from the sample budget table, which is provided as an example of what applicants may want to include in their response. Please note that there is a 5% statutory cap on administrative costs, so reviewers will assess whether this limit was exceeded. Responses will be evaluated less favorably if administrative costs exceed 5% of the total EPA-requested funds.

Q: Can you provide an example of how health monitoring has been used in a grant. For instance, can it be used for ambient air sampling, or regional groundwater sampling to confirm contaminants of concern in the air/groundwater contributing to the health impacts?

A: The [Health Monitoring & Brownfield Grants information sheet](#) on EPA's website provides some examples of how health monitoring has been used.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS & ANSWERS

Q: If an organization has not received federal funding in the past, but the program manager/main contact for the grant does have federal grant experience from a prior employer, does it still fall into the category of not having received federal funding?

A: Yes, the organization described would fall under criterion 4.g. *Never Received Any Type of Federal or Non-Federal Financial Assistance Agreements*. The past performance criterion applies to the entity that is applying for funding, not their individual staff members' experience. Under criterion 4.c. *Description of Key Staff*, you are asked to describe the key staff who will successfully administer the grant, including their roles, expertise, qualifications, and experience. You may describe the program manager's experience there.