

EPA Gulf of America Division (GAD) 2025 Funding Opportunities Q&A

All questions added after the original posting date, will have “**NEW (added on MM/DD/YYYY)**” so you can review additional questions as added.

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NOTE TO APPLICANTS: GAD is able to 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. **GAD is NOT able to respond to questions requesting input on a project idea, format of an application, or other project specific questions prior to the application deadline that may compromise a fair and competitive process.**

If the applicant has not been awarded an EPA grant previously, please review the recorded webinar and/or presentation found here: <https://www.epa.gov/grants/epa-grants-award-process-webinars>

EPA-I-R4-GAD-2025-FARMER: Farmer-to-Farmer 2025

Q. How much funding is available?

A. The total estimated funding expected to be available is approximately \$50 million (with a minimum of \$1,500,000 per award up to a maximum of \$2,500,000 per award) unless additional funding becomes available.

Q. What is the definition of innovative technology?

A. For the purposes of this NOFO, innovative technology is the development of or improvement of an existing tool, equipment, system, or methodology to solve a problem or enhance efficiency.

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General

Q: Would applying for a smaller award than the identified maximum in each NOFO disadvantage an application?

A: No, as long as it is not less than the minimum of \$1,500,000.

Q. Will there be more funding available in the future?

A. Funding for the Gulf of America Division is dependent each year on allocations in the federal budget approved by Congress and the program priorities during that time.

Q. Is this funding opportunity available each year? Will it be available next fiscal year?

A. Funding for the EPA Gulf of America Division is dependent each year on allocations in the federal budget approved by Congress and the program priorities during that time.

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Submitting an Application

Q. Where do I start?

A. The applicant should start by closely reading the funding announcement and determining whether the project is within the scope requested. If so, the applicant should determine whether their organization is eligible by reviewing Section 2.A for Eligible Applicants and Other Eligibility Requirements. Carefully consider the Scope of Work and the Environmental Results (Section 3.A). Use the Project Narrative Form (Section 4.A) and Review Criteria (Section 6.B) to ensure the application includes all required information.

Q. What kind of materials need to be submitted for the application?

A. To apply for a GAD grant, see Section 4 Application Contents and Format and Section 5 Submission Requirements and Deadlines of the NOFO.

Q. What is the application submission deadline?

A. Applications must be submitted through Grants.gov as stated in Section 1.C of this NOFO (except in the limited circumstances where another mode of submission is specifically allowed for as explained in Section 5.D) on or before the application submission deadline.

Q. How will EPA review applications?

A. Please see Section 6 of the NOFO.

Q. Are applicants required to follow the format detailed in 4.A of the NOFO?

A. It is highly recommended that the applicant explain each aspect of the application clearly and address each topic by following the format provided in Section 4.A, include the headings as given, and do not reorder the paragraphs, or the applicant risks the possibility of information being left out, or being overlooked, and/or not being fully comprehended by the reviewers when the project is scored.

Q. Can someone be PI on one application and co-PI on another? Are multiple submissions from one organization generally encouraged or discouraged?

A. There is no limit to the number of applications an individual can be involved in nor the number of applications an organization can submit. GAD receives a high volume of applications and are only able to fund a small percentage.

Q. Please confirm maps do not count against the page 12-page limit on the Project Narrative.

A. Maps do not count against the page 12-page limit on the Project Narrative. Placing maps at the end of the document and referencing them in the narrative portion of the document will help ensure the page limit has not been exceeded.

Q. Can you confirm the Project Workplan page limit and clarify the use of terms such as project narrative and workplan in the NOFO?

A. The term "project narrative" is made up of the summary page, project workplan, and detailed budget narrative. The project narrative has a 12-page limit which includes 1 page for the Summary Information Page and 11 pages for the project workplan and budget narrative.

Q. Are we able to provide hyperlinks to important, related documents (reports, manuscripts, case studies, etc.) in the narrative? Or do those have to be added to the end of the proposal? Or should they not be included at all, which would mean the reviewers just have to believe me?

A. You may link to them in the narrative and/or supporting materials can be submitted as attachments using the “Optional Attachments” form. There is no guarantee that reviewers will review any supplemental material; therefore, applicants should be sure to include the information that explicitly addresses the review criteria **in the 12-page project narrative**.

Q. Does the Intergovernmental Review have to be complete prior to submission of the proposal to the EPA, or is it sufficient to have submitted the request for review to the state SPOC prior to submitting the proposal to the EPA?

A. No, the review doesn’t have to be complete prior to submission. It is sufficient to have submitted the request for review prior to submitting the proposal to the EPA. If you select **a.** on the application, then you must provide the date it was submitted for review.

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Eligibility/Project Eligibility

Q. Can a for-profit organization be eligible for the grant proposal?

A. No

Q. Clarify whether federal agencies are eligible to directly apply as the primary lead or if agencies are only eligible to participate through reimbursable agreements.

A. The Federal Government is ineligible to directly apply. The information below is included in the funding opportunity in Section 2.A. Eligible Applicants - In accordance with Assistance Listing 66.475, governmental entities, including state agencies, interstate agencies, Indian tribes, local governments, institutions of higher learning, and nonprofit organizations are eligible to apply for funding under this NOFO.

Q. Could you please confirm if the eligible entities for a subaward are the same as the eligible entities for the pass-through entity?

A. Eligibility to receive subawards is determined by EPA's Subaward Policy:

<https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients>. From Sec. 7, eligible entities are as follows:

(a) Generally, unless prohibited or limited by statute, a non-Federal entity or individual is eligible to receive a subaward even if it is not eligible to receive an assistance agreement from EPA directly if the subaward is consistent with applicable regulations, policies, and EPA guidance. Federally Funded Research and Development Centers are eligible subrecipients provided the substance of the transaction is consistent with the guidance at 2 CFR 200.331 and Appendix A: Distinctions Between Subrecipients and Contractors.

(b) As provided in 2 CFR Part 25, Appendix A, Federal agencies are subrecipients for the purposes of the System for Award Management and Universal Identifier Requirements when they receive "subawards" from pass-through entities. Federal agencies may also be subrecipients for the purposes of 2 CFR Part 200 as indicated in the definition of Subrecipient in 2 CFR 200.1. Nonetheless, Federal agencies must have statutory authority to provide services to recipients or subrecipients on a reimbursable basis or otherwise receive and use funds from recipients or subrecipients under subawards. Examples of statutes available to all Federal agencies for receipt and use of EPA financial assistance funds are the Intergovernmental Cooperation Act for services to State and local governments, the Federal Technology Transfer Act for Cooperative Research and Development and Agreements, and the Omnibus Territories Act for reimbursable services agreements with U.S. Territories.

(c) For-profit organizations and individual consultants, with very few exceptions, are contractors rather than subrecipients under the standards in 2 CFR 200.331. Passthrough entities must select subrecipients and conduct subaward competitions, as appropriate, using a system that properly differentiates between subrecipients and procurement contractors consistent with the differentiating characteristics explained in 2 CFR 200.331 and EPA's supplemental guidance in Appendix A of the EPA Subaward Policy. See Appendix A: Distinctions Between Subrecipients and Contractors for additional guidance.

(d) Nonprofit organizations exempt from taxation under section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities are ineligible for EPA subawards based on the Agency's policy for interpreting the Lobbying Disclosure Act, 2 U.S.C.1611.

(e) EPA program office staff must ensure that pass-through entities are aware of limitations on subrecipient eligibility contained in statutes or regulations. EPA program offices may communicate applicable limitations to potential pass-through entities in announcements for competitive awards, program guidance for continuing environmental program grants or other noncompetitive awards, and programmatic terms and conditions.

(f) In consultation with the Office of Grants and Debarment's National Policy, Training and Compliance Division (OGD NPTCD) and the Office of General Counsel (OGC) or Office of Regional Counsel (ORC), as appropriate, EPA program offices may establish policies limiting eligibility for subawards to the extent permitted by statute or regulation. EPA program offices must communicate applicable policies to potential pass-through entities in announcements for competitive awards, program guidance for continuing environmental program grants or other noncompetitive awards, and programmatic terms and conditions.

Q. How can I tell if I am eligible to apply for a grant?

A. Please refer to Section 2.A. of the NOFO.

Q. Our organization is a nonprofit but does not have a 501c3. Are we eligible to apply?

A. Consistent with the definition of Nonprofit organization at 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 and is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. The term includes tax-exempt nonprofit neighborhood and labor organizations.

Nonprofit organizations that are not exempt from taxation under section 501 of the Internal Revenue Code must submit other forms of documentation of nonprofit status; such as certificates of incorporation as nonprofit under state or tribal law.

Q. What is ineligible for funding?

A. Section 2.A in the NOFO identifies eligible and ineligible entities and activities. EPA also conducts a threshold eligibility review of all applications against criteria in Section 2.A.1. Applicants deemed ineligible for funding consideration because of the threshold eligibility review will be notified within 15 calendar days of the ineligibility determination.

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Environmental Outputs and Outcomes

Q. What are "Outputs and Outcomes"?

A. Outputs and outcomes are defined in Section 3.A(3) of the NOFO along with required and/or suggested. The terms outputs and outcomes are derived from EPA Policy Order 5700.7 Environmental Results. EPA's priority is to support projects that are likely to achieve **quantifiable** outputs and outcomes. Applicants must include specific statements describing the environmental results of the proposed project in terms of well-defined "outputs" and "outcomes".

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Project Monitoring

Q: Will a QAPP need to be developed and approved by EPA for each project funded through this NOFO?

A. Please see the NOFO Section 4.E. for additional information about required QAPPs.

Q. Does EPA provide a QAPP template that we could use and modify? We are estimating that the time to develop the QAPP and have it approved by EPA would be about 6 months. Is that correct?

A. Yes, GAD has a QAPP template that will be shared with recipients post award that can be modified for their project. It is based on EPA's [QAPP Standard, Directive No: CIO 2105-S-02.1](#). Turnaround time for approving a QAPP varies based on how well developed the initial submission by the recipient is and how quickly reviews and edits are completed. Six months is a reasonable estimate for planning purposes.

Q. What is the definition of Environmental Data?

A. EPA's Environmental Data Definition: Environmental information or data is defined as any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology.

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Match Requirement

Q. Is there a match requirement?

A. No matching funds are required under this competition.

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Contracts and Subawards

Q. Can grant funding be used by the applicant to make subawards, acquire contract services, or fund partnerships?

A. Yes, funds can be used for contracts and subawards in accordance with the additional provisions instructions which can be found on [the EPA Solicitation Clauses](#) page. EPA awards funds to one eligible applicant as the "recipient" even if other eligible applicants are named as "partners" or "co-applicants" or members of a "partnership". The recipient is accountable to EPA for the proper expenditure of funds and reporting requirements.

Q. May EPA grant recipients enter into agreements with federal agencies to carry out tasks/activities under the grant work plan?

A. Grant recipients may enter into reimbursable agreements with federal agencies as long as those federal agencies are authorized under applicable federal laws to enter into such agreements with federal grant recipients. This is the mechanism by which a grant recipient can work with a federal agency as a partner. Reimbursable agreements do not have to be competed, but grant recipients must provide a brief explanation as to why they are selecting a federal agency to carry out the work.

Q. If awarded a grant, can a grantee contract with a for profit entity?

A. A for profit can be selected as a contractor.

Q. We plan to go through a competitive process to hire a contractor, but it will not be able accomplished prior to the application deadline. Is it okay to include a placeholder amount and wait to ensure the project is funded prior to beginning the competitive process?

A. Yes.

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Standard Form (SF) 424 and SF 424 A

Q. Are there definitions to describe the amounts that should be entered for 18? And is there a description of what is asked for # 19?

A. The following answers pertain to the SF-424.

Please find instructions for the SF-424 here: <https://www.grants.gov/forms/form-items-description/fid/713>

Additional information for question 19 can be found here:

<https://www.fws.gov/policy/library/rgeo12372.pdf>;
<https://19january2021snapshot.epa.gov/grants/fact-sheet-applicants-intergovernmental-review-process.html>; and <https://www.ojp.gov/IntergovernmentalReviewSPOCList.pdf>.

Q. How should question 19 be answered on the SF 424?

A. Mark A and submit your application to your intergovernmental review state point of contact if **BOTH** of the following are true of your project:

1. Project involves land use planning or construction associated with demonstration projects.

2. Please follow this link: <https://www.epa.gov/grants/epa-financial-assistance-programs-subject-executive-order-12372-and-section-204>. If the applicant's state is listed in the State POC list, the project will need to be submitted to the state for review. Select a or b as applicable; otherwise, select C.

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Budget

Q. Are equipment purchases allowable if they directly related to executing the project?

A. Yes

Q. May interns/seasonal staff be hired using these funds?

A. Yes

Q. Does the EPA have any issue with the applicant purchasing materials and providing to subrecipients to enable ordering in bulk?

A. No

Q. Are pre-award costs eligible?

A. In certain circumstances, costs incurred within 90 days prior to the grant award may be eligible for reimbursement. However, this does not include any costs associated with responding to this solicitation or in finalizing the application package. If costs are incurred before the award, they are incurred at the applicant's own risk.

Q. What are Indirect or overhead costs?

A. Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, contract, project function or activity, but are necessary for the general operation of the organization and the conduct of activities it performs (source: Indirect Cost Overview, Dept. of Education). To charge Indirect costs to the grant, the applicant must have an up-to-date approved Negotiated Indirect Cost Rate Agreement (NICRA) with its cognizant agency. EPA does recognize NICRAs negotiated with other federal agencies.

Q: Should the NICRA come from the cognizant agency (the federal agency they receive the most federal funding from) OR MUST it be a negotiated with EPA (regardless of who they receive the most federal funding from)?

A: A federally approved NICRA is negotiated by the cognizant federal government on behalf of the entire federal government, and the cognizant federal agency is assigned to the agency providing the most direct federal funding to the recipient. Therefore, EPA would accept a NICRA negotiated with another federal agency. If the organization does not have a NICRA, use the 15% de minimis applied to the modified total direct cost base or negotiate a NICRA with the cognizant agency.

Q. What if an organization does not have a NICRA?

A. Any non-Federal entity without a NICRA may elect to charge a [de minimis](#) rate of 15% of [modified total direct costs \(MTDC\)](#) which may be used indefinitely.

Q. How do I ensure I'm putting the costs in the correct budget categories?

A. There are several guidelines used for federal budgets. The recorded webinar and presentation found here <https://www.epa.gov/grants/epa-grants-award-process-webinars> provides an overview of the grant application process, including what should be included in the budget categories and the cost principles EPA utilizes. In addition, see [EPA's Interim General Budget Development Guidance](#) as well as helpful hints and sample language. For questions about a particular item, please feel free to email the question to GAD-NOFO@epa.gov

Q. Can these projects fund international travel?

A. It depends on the relevance of the travel to the project. When international travel is requested an additional layer of review and approval is required.

Q. When using EPA's suggested budget template, should subrecipients and subcontractors be placed in the "Contractual" section?

A. Contracts for procurement are entered in the Contractual category, and subrecipients are entered in in the "Other" budget category.

Q. Please advise if the suggested Budget Table template should also be used by lower tier subrecipients, then rolled into the applicant's Budget Table template?

A. GAD's budget table template is recommended for the applicant, but any subrecipient budget information can be presented in the way that makes the most sense for the application. Subawards generally do not require the same level of detail in the budget (per object class category) as the applicant. Subaward budgets may simply be a total anticipated cost if subaward activities are clearly described.

Q. Does this opportunity allow funding to be used for a staff position? Is there a cap on the personnel costs?

A. See additional information at [EPA's Interim General Budget Development Guidance](#). It does not discuss a cap on personnel costs, because there isn't one that is directed, but all costs should be reasonable based on the activities that will take place during the project period and should only cover the identified project period.

Q: Using the suggested budget template, how are additional lines for Contractual services added (beyond the ones in the Additional Lines C-H)?

A: Contact mills.calista@epa.gov and GAD-NOFO@epa.gov for questions regarding the budget template.

Q: The Excel spreadsheet for the budget table template requires a password.

A: The template is secured to ensure formulas are not modified. Instructions for using the template are in Tab 1 Budget Guidelines. Tab 2 is an example of the required line-item budget. To create applicant-specific line-item budget, please edit Tab 4 to reflect all planned expenditures. Enter project specific information in the yellow cells and the spreadsheet will auto calculate the budget. Additional lines are available in tabs 5 and 6 if needed.

Q: Can the budget template be edited to add match/cost share?

A: As stated in Section 2.B of the NOFO: "Cost sharing is not a requirement to be eligible to apply to this funding opportunity." Because matching/cost share funds are not required, it will not be part of the evaluation process, and it is not necessary to include in the application.

Q. What are the key pieces of information necessary (questions to answer) to justify the selection of a sole-sources contract?

A. Please see the following screenshot. If the applicant decides to sole source a contract, identify what activities the contractor will be responsible for and why they are the only contractor capable of

providing this work (that would be the justification for a sole source contractor). For contracts that solicit bids, please include that a contractor will be competitively selected and which activities the contractor will be responsible for. The applicant should not bid out contracts until the award is final.

a. The applicant should list the proposed contract activities along with a brief description of the scope of work or services to be provided, proposed duration, and proposed procurement method (competitive or non-competitive) in its budget narrative.

b. EPA does not require applicants to identify contractors (including consultants) in the work plan, and the terms of EPA's competitive announcements warn applicants not to do so unless they have already complied with the 2 CFR Part 200 Procurement Standards. Refer to the Sole Source Guidance in Subsection C. 3. Of the

[Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#)

Q. Is it possible to provide landowners with incentive payments for implementing practices on their properties?

A. Participant support costs, such as incentive payments, are allowable costs. In the budget narrative, please provide a detailed description of the costs and why they are necessary to accomplish the project.

Q. Should the detailed budget narrative include budget tables as well as have a separate attachment for the suggested budget template? Or is the reference to budget table and the budget narrative separate documents?

A. Your budget should be comprised of two elements - the **detailed narrative** (Section 8 of the project narrative) and a **table**. If you include the table in the narrative, make sure you do not exceed the 12-page limit. You may attach the budget table, your own or the suggested template, in the Budget Narrative Attachment form. You don't have to complete and include two tables.

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Other Questions

Q. Can references cited be added as supporting material or must literature cited fit into the page limit?

A. A references page for citations may be added as supporting material and would not be included in the page limit.

Q. Is it a disadvantage for the lead organization to be one that has a current GAD award?

A. It is neither an advantage nor disadvantage. All applications will be evaluated based on the criteria identified in the NOFO.

Q. Where should the NICRA be uploaded into the Grants.gov package?

A. The NICRA can go in the “Optional Attachments Form” section.

Q. How do I submit an additional question that has not been addressed in this document?

A. GAD is able to 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. Submit questions via email to GAD-NOFO@epa.gov.

Q. For the resumes, is there a required format or a page limit?

A. There is neither a required format nor a page limit.

Q. Regarding letters of support, what is the recommended number to include with submission?

A. There is not a recommended amount or number. Letters of Support should be included for partners with substantial involvement and/or if project success depends on partner involvement/subaward.

Q. Can the same person participate on two applications?

A. Yes

Q. Can a for-profit company (start up company) participate in the proposal as Co-PI? If they cannot be co-PI, can we purchase their product for our water treatment project?

A. For-profit companies are not eligible applicants; however, they could provide contract support. Contracts are subject to the competition requirements in 2 CFR 200. The fact that a recipient has named a contractor in its proposal as a “partner” or otherwise does not in and of itself justify a sole source award. Likewise, products needed for the project completion must be purchased compliant with 2 CFR 200.

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