Fiscal Year 2027 Frequently Asked Questions for Brownfields Job Training Grants
As of September 10, 2026

EPA prepared these Frequently Asked Questions (FAQs) and Answers to assist prospective applicants with preparing Brownfields Job Training (BFJT) Grant applications for the Fiscal Year 2027 (FY27) competition. Please review the FY 2027 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 statutes, regulations, and/or the Guidelines, then the statutes, regulations, and/or the Guidelines will take precedence. The FAQs will be updated periodically as EPA continues to receive questions.

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A.1. Changes to the Brownfields Job Training Guidelines

How have the Brownfields Job Training Grant Guidelines changed?

EPA has made several revisions to the Brownfields Job Training Grant Guidelines since the FY 2026 competition, including revisions to threshold language, general requirements, and the review criteria to clarify existing language. A more detailed description of changes is outlined in the *Fiscal Year 2027 Brownfields Job Training Guidelines Summary of Changes* and reflected in the guidelines.

A.2. Information on Submitting the Application

What is the deadline to apply for a FY27 BFJT Grant?

BFJT grant applications are due **September 23, 2026,** at 11:59 p.m. Eastern Time (ET). **EPA** will not consider **applications received after 11:59 p.m. ET on September 23, 2026, for funding.**

How do I submit my BFJT Grant application?

Your organization's Authorized Organization Representative (AOR) must submit your complete grant application package electronically to EPA through www.grants.gov no later than 11:59 p.m. ET on **September 23, 2026**. Please allow enough time to successfully submit your application package, to include time to address unexpected issues that may require you to resubmit your grant application.

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.

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

As stated in Section 5.D. of the Guidelines, an applicant may request to submit a hard copy of their grant application if the applicant lacks the technical capability to apply electronically through www.grants.gov because of limited or no Internet access. 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 (September 23, 2026) to allow enough time to negotiate alternative submission methods.

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 from Grants.gov 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 noting the application package was "rejected with errors" and what the error is. This gives you the opportunity to resolve the error(s) 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.

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.

Can I apply for grant funding if my 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.

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.

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 are not registered in www.sam.gov yet, your organization's EBiz POC must register you.

The EBiz POC is issued a Marketing Personal Identification Number (MPIN) by www.sam.gov, which authorizes the EBiz POC 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.

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.

Can I use another organization's UEI number to submit my grant 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.

My 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 Application Information Sheet, Narrative Criteria Responses, Threshold Attachments, required attachments, etc.) into a single PDF file. This will help ensure that EPA receives your entire submission and that the submission is in the order you intended. Please review the *Tips for Submitting Brownfields Grant Competition Applications* for additional application submission tips.

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" for Brownfields Job Training grants is 66.815 and the "CFDA Title" is Brownfields Job Training Cooperative Agreements.

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.

A.3. General Guidelines and Application Process Questions

How can I receive help in understanding and responding to the FY27 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 August 6, 2026, from 2 PM to 4 PM, EDT. Please use this link to join the event. A copy of the presentation will be available on the FY27 Brownfields Job Training Grant Solicitation Page.

EPA Regional Brownfield Job Training Coordinators may respond to questions regarding threshold eligibility criteria, administrative issues related to grant application submission, 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 application criteria. Limitations on EPA staff involvement with grant applicants are discussed 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 staff may only provide limited pre-application assistance, EPA Technical Assistance to Brownfields Communities (TAB) providers are EPA cooperative agreement recipients that are available to 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 grant application, and review draft grant applications. P lease note, however, that while a TAB provider is a source of technical assistance, they will not write your grant application for you, and you, as the applicant, are ultimately responsible for the content within your grant application. 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
- Technical Assistance for Nonprofits
- Brownfields Land Banking Strategies
- National Brownfields Training Conference
- Brownfields Revitalization Anti-Displacement Strategies Program
- Technical Assistance to Brownfields Job Training
- Brownfields Revolving Loan Fund Technical Assistance

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

What does the FY27 Brownfields Job Training Grant application process entail?

To apply for a Brownfields Job Training Grant, you must submit a grant application through www.grants.gov. In order to use www.grants.gov, you must register your organization with www.grants.gov, obtain a UEI number, and also register your organization with www.sam.gov. This process can take weeks to complete and applicants are strongly encouraged to begin the 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.

How will my application be evaluated?

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

Applications that pass threshold review will be scored on their responses in their Narrative Criteria Responses by a national review panel. The national review panel will base their review on the review criteria outlined in Section 6.B. of the NOFO. Applicants should respond to the Narrative Criteria Responses Section in Section 4.D. of the Guidelines. Note that applications are scored out of 200 points.

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 the Sample Other Factors Checklist Form, as described in Section 4.B.ix., and should be included in the Application Information Sheet. EPA will use the content included in the application and/or external information to determine if the consideration applies.

What is the maximum amount of money that a BFJT applicant may be awarded?

An eligible applicant may apply for up to $300,000 per grant for eligible activities. In FY27, EPA anticipates awarding approximately 20 Brownfields Job Training Grants for a total of $6,000,000. 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.

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 (8 points). Failure to respond to this criterion will result in a score of zero.

How can I demonstrate that my proposed job training program does not duplicate other Federally funded environmental job training program activities?

If the applicant is in receipt of other Federal funding to support environmental job training program activities in their proposed target community, such as those funded through EPA's Superfund Job Training Initiative, the National Institute of Environmental Health Sciences, the Department of Labor, and/or other Federal agencies, the applicant must demonstrate: a) that the proposed training program does not duplicate their other Federally funded program activities; or b) how the proposed training to be funded with BFJT funds will complement, but not duplicate, the other Federally funded environmental job training activities (e.g., different target audience, such as a different age group, differing types of certification 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

Are stipends or scholarships an eligible use of BFJT Grant funds?

Yes. As stated in the Budget section of Section 4.D.3. of Solicitation EPA-OLEM-OBLR-26-01, for the Brownfields Job Training Program, "Transportation stipends, monetary stipends, and childcare subsidies are considered participant support costs (PSCs) that are separate and do not count toward instruction/training costs. Scholarship funds to support students' enrollment in college courses are **not eligible** costs.

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 by EPA in response to a recipient's post-award written request for approval. PSCs must be necessary to the goals of the project, for a reasonable amount, and be adequately documented through receipts. Note that the same costs must not duplicate support provided through other Federal, state, Tribal or local programs. Additional information is available in EPA's Guidance on Participant Support Costs.

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 Grants Management Officer (GMO) or authorized Award Official. Note, it is very unlikely that EPA will approve PSCs in excess of 40% of the total grant award. As stated in the Budget section of Section 4.D.3. of Solicitation EPA-OLEM- OBLR-26-01, for the Brownfields Job Training Program, "The total amount of stipends, including participant support costs to hire the trainees as W2 employees, may not exceed 40% of the total award." Based on the limitations of allowable PSCs stated in Solicitation EPA-OLEM-OBLR-26-01, GMOs will not approve an increase in PSCs beyond 40% of the total award unless the recipient provides a compelling justification and the EPA Project Officer concurs with the request.

If my organization is successful in obtaining EPA funding, are the costs for preparing my grant application an eligible expense under the grant?

No. Grant application preparation costs are unallowable in the BFJT Program.

Are pre-award costs eligible expenses under BFJT Grants?

Maybe. 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 applicable federal competitive procurement requirements in 2 CFR Parts 200 and 1500 and 40 CFR Part 33.

As provided in 2 CFR § 200.458, pre-award costs must be incurred ". . . 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." 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 GMO or Award Official to incur pre-award costs more than 90 calendar days before award. Applicants selected for award who intend to incur preaward costs more than 90 calendar days before award must discuss this with their EPA Project Officer.

What formatting should I use for writing my application?

As stated in Section 4.A. of the NOFO, the Narrative Criteria Responses and Application 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.C. of the NOFO, and are limited to one scanned image per page. Applicants must provide their response to Section 2.B. Threshold Criteria as a Threshold Criteria Attachment(s) that is submitted to EPA. Threshold Criteria Attachments do not have a page limit. 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.

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 a trainee 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 a QEP immediately upon completion of the training courses referenced above. 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, 40 CFR Section 312.10. Individuals who do not meet the educational requirements can still qualify as an environmental professional 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 participating in the Job Training Program will meet these educational and experience requirements immediately upon completion of the training courses described in the question.

How do I find an eleven-digit census tract number?

If you have an address for your proposed priority site(s), one way to find your priority site's census tract number is using the U.S. Census Bureau's Geocoder: geocoding.geo.census.gov/geocoder/geographies/address?form. Type in your site's street, city, State abbreviation, and zip code, and click get results. To easily navigate to the census tract number, use the keyboard shortcut by pressing 'Ctrl+F' to open the search bar and type in "Census Tracts." To provide the eleven-digit census tract number, copy and paste the State code, county code, and tract code numbers. For example, for the address 1200 Pennsylvania Ave Washington, DC 20004, the State code is 11, the county code is 001, and the tract code is 980000. The applicant would provide the number: 11001980000. Repeat these steps for any additional priority sites, as needed.

A.4. Applicant Eligibility

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

To be eligible to apply for a Brownfields Job Training Grant under CERCLA § 104(k)(7), applicants must fall within one of the eligible entity types described in CERCLA § 104(k)(1) or otherwise fall within the definition of **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. Local government means a county, borough, municipality, city, town, township, parish, local public authority (including any public housing agency under the United States Housing Act of 1937), special district, school district, intrastate district, council of governments (whether or not incorporated as a nonprofit corporation under State law), and any other agency or instrumentality of a multi-, regional, or intra-State or local government.
- 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*.
- Federally recognized Indian Tribe other than in Alaska. (The exclusion of Tribes in Alaska, with the exception of the Metlakatla Indian Community as noted below, from grant eligibility is statutory at CERCLA § 104(k)(1)(G).)
- Intertribal Consortia, except consortia comprised of ineligible Alaskan tribes, 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 may also be obtained from your EPA Regional Job Training Coordinator listed above.
- Alaskan Native Regional Corporation, Alaska Native Village Corporation (as those terms are defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1601 and following)), and the Metlakatla Indian Community. For more information, please refer to the FY27 JT FAQs.
- Nonprofit organization described in section 501(c)(3) of title 26 (the Internal Revenue Code (IRC)) and exempt from taxation under 501(a) of that title.
- Limited liability corporation in which all managing members are 501(c)(3) nonprofit organizations exempt from taxation under 501(a) of the IRC or limited liability corporations whose sole members are 501(c)(3) nonprofit organizations exempt from taxation under 501(a) of the IRC.
- Limited partnership in which all general partners are 501(c)(3) nonprofit organizations exempt from taxation under 501(a) of the IRC or limited liability corporations whose sole members are 501(c)(3) nonprofit organizations exempt from taxation under 501(a) of the IRC.
- Qualified community development entity as defined in section 45D(c)(1) of the IRC.
- Other Nonprofit organizations. EPA uses the definition of Nonprofit organization in 2 CFR § 200.1, which means any organization that is operated mainly for scientific, educational, service, charitable, or similar purposes in the public interest; is not organized primarily for profit; uses net proceeds to maintain, improve, or expand the operation of the organization; and is not an Institution of Higher Education (IHE). Eligible nonprofit organizations under this announcement may be, 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.

Note, individuals, for-profit organizations, and nonprofit organizations that are not tax exempt under section 501(c)(3) are ineligible to receive a Brownfields Job Training Grant. Organizations exempt from taxation under section 501(c)(4) of the IRC may be eligible for a Brownfields Job Training Grant if they also qualify as an eligible entity type listed above and demonstrate that they do not lobby the Federal government.

*As defined in CERCLA § 101(27), the definition of State for purposes of the Brownfields Program "include[s] the several States of the United States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United

States Virgin Islands, the Commonwealth of the Northern Marianas, and any other territory or possession over which the United States has jurisdiction."

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.

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 federal grant regulations, as applicable. Refer to the Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for detailed guidance about competitive procurement requirements under EPA grants.

A.5. Brownfields Job Training Coalitions

What are Brownfields Job Training Coalitions and what requirements must a Brownfields Job Training Coalition meet?

Brownfields Job Training Coalitions are designed for one eligible "lead" entity to partner with one or more eligible non-lead entities that do not have the capacity to apply for and manage their own EPA cooperative agreement. The lead coalition entity (i.e., the lead member) submits an 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 $300,000 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 grant.

What should the Brownfields Job Training Coalition Memorandum of Agreement (MOA) contain? How can 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 should include at minimum 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 is available on the EPA Brownfields website at https://www.epa.gov/system/files/documents/2025-05/bfjt-coalition-moa.pdf. This document is a sample, and not required to be used, but it is encouraged.

Can the lead entity of a Brownfields Job Training Coalition be replaced with another eligible lead entity after the application is submitted?

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

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. A non-lead member of a coalition may not have an open Brownfields Job Training cooperative agreement with EPA. Coalition members may not be members of other FY27 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.

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

Yes, provided the city and the redevelopment agency are separate legal entities under state and local law, and that the redevelopment agency is not otherwise an instrumentality of the city, 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.

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

No. Two State agencies cannot be coalition members of the same BFJT coalition 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. Other entities created by State legislature such as regional planning commissions that are not subject to the direct control of the governor can be coalition members along with a State agency.

A.6. Training Program Structure

What training is required to be in our curriculum?

The only required training is OSHA 29 CFR § 1910.120 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER). Beyond this, the applicant may design a curriculum as they see fit so long as the courses offered are an eligible use of grant funds. Please consult Section 3.A.3 and 4 of the FY27 Brownfields Job Training Grant Guidelines for a list of example courses that 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.

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?

The applicant must document that OSHA 29 CFR § 1910.120 40-hour HAZWOPER training will be included in their training curriculum. All participants who go through training funded by the Brownfields Job Training Program must hold a current 40-hour HAZWOPER certificate compliant with OSHA 29 CFR 1910.120(e)/1926.65, via initial 40-hour training or verification of prior 40-hour HAZWOPER plus required 8-hour annual refresher per 1910.120(e)(8)/1926.65(e)(8). EPA expects that a majority of the participants going through an applicant's job training program will need to take the initial 40-hour course. EPA expects Brownfields Job Training participants to be high-need local residents of the defined target area. The applicant's program should prioritize recruiting unemployed and underemployed adult residents of the target area who live near or within communities impacted by brownfields and a variety of waste facilities, blighted properties, contaminated sites, and other environmental issues, with particular emphasis on low-income, Tribal, and Indigenous communities and other sensitive populations - including veterans, formerly incarcerated persons, and individuals with little to no education beyond high school.

Updated on September 10, 2026 - What is the average number of individuals trained during a training cycle?

In past job training reporting, an average of 20-24 individuals have been trained during each cycle. This number may fluctuate depending on multiple factors including where the training program is located, i.e., an urban area versus a rural community, the intensity and comprehensiveness of the curriculum, the number of certifications to be earned, and the varying costs of delivering training. In addition, program maturity can affect enrollment and training outcomes. BFJT programs with established reputations may have an advantage over new and less established programs. During the first year of operation, new programs, without graduates or a track record, may need to devote considerable effort to outreach, promotion, and building community awareness to recruit unemployed, underemployed, and other high need participants and ensure success. 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.

What is the average number of training cycles delivered under a BFJT grant?

Grant recipients typically offer 2-3 training cycles per year. This number can fluctuate depending on multiple factors, including 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 third, 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 two.

Does EPA require BFJT Grant applicants/Grant recipients to have a set training curriculum?

No. The only required training is OSHA 29 CFR 1910.120 40-hour HAZWOPER, as stated above in question F.1.

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).

What are some things to consider when designing a curriculum?

The goal of the Brownfields Job Training Program is to prepare participants with the skills and 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 (such as those that will enhance student learning and/or enhance graduates chances of being hired, including, but not limited to, commitments to interview students and/or hire graduates) 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 may increase your application's chances of being selected.

What are examples of eligible training with BFJT Grant funds?

A non-exhaustive list of examples of eligible training courses that can be paid for with Brownfields Job Training grant funds is included below. **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.

- 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 sustainable deconstruction in preparation of a brownfield site cleanup or redevelopment.

- Training participants in the use of techniques and methods for cleanup of hazardous substances, petroleum, and pollutants, such as asbestos abatement; lead abatement; lead renovation, repair, and painting (RRP); mold remediation; and cleaning up sites contaminated by the manufacturing of illegal drugs (e.g., methamphetamine labs), abandoned gas stations, or mine-scarred lands.

- Training in confined space entry.

- Training in first-aid, cardiopulmonary resuscitation (CPR), and how to mitigate safety risks from bloodborne pathogens in a site remediation setting.

- 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 § 101(35)(B), and due diligence.[1]

- Training in radiation safety and the cleanup of uranium mine tailings.

- Training in Hazardous Material (HAZMAT) commercial driver's license (CDL)[2], forklift, and machine operations associated **with the transportation of hazardous waste**.

- Training in freon removal or the removal of hazardous substances from white goods located on a brownfield site.

- Training in the use of compost and soil amendments and associated sampling, testing, and design considerations, and management techniques to support the assessment, cleanup, and preparation of sites for urban agriculture and horticulture.

[1] Due diligence is the process for evaluating a property for the potential presence of environmental contamination and for assessing potential liability for any contamination present at the property.

[2] A commercial driver's license must be incidental to an overall training course related to hazardous waste transportation. It may not be required or used for any other purpose.

- Training participants in planning and conducting ecological restoration of contaminated land, including general botanical classes or introductory horticultural classes related to land and stream restoration or indigenous species and native plant re-vegetation; landscaping; and soil science related to preparing sites for reuse and redevelopment.

- Awareness training in environmental stewardship and sustainable community revitalization to promote community involvement in assessment, cleanup, and reuse of brownfield sites.

- Training in strategies for environmental mitigation, adaptation, or resiliency as it relates to preparation of brownfield sites for cleanup and subsequent reuse.

- Training in building trades related to constructing berms, caps, synthetic barriers, pumping facilities, bioretention systems, and similar structures to remediate contamination and site preparation.

- Training in national historic preservation and tribal historic preservation requirements associated with cleanup projects.

- Training in vapor intrusion testing and mitigation.

- Training in site surveying, mapping, blueprint reading, computer-aided design and drafting (CADD), and geographic information systems (GIS).

- Training in release detection methods, techniques, and practices at underground storage tank (UST) facilities where hazardous substances and/or petroleum products are or were located, in order to assess whether the tanks have leaked or may be leaking. This includes training for jobs that conduct activities such as tank or piping tightness testing; testing of spill prevention equipment and containment sumps; inspections of overfill prevention equipment; testing of release detection equipment; and walkthrough inspections.

- Training in "green remediation" technologies, such as phytoremediation, bioremediation, or soil amendments; advanced sampling instrument operator training; or training in the reuse of biosolids and other industry residuals.

- Training in stormwater management, as it relates to the assessment and cleanup of brownfield sites; green infrastructure installation, management, and maintenance; or low impact development (LID) training for the purpose of preparing a brownfield site for sustainable reuse.

- Training in emergency planning, preparedness, and for emergencies leading to contamination on brownfields sites, such as organizing and implementing exercises; outreach to the public; spill response and cleanup, including industrial and environmental (e.g., oil spills, natural disasters, etc.); first responder,

disaster site worker certification, and National Incident Management System (NIMS) training; Disaster Recovery.

- Training in enhanced environmental health and safety related to site remediation, such as promoting chemical (substance, mixture, or article) safety awareness and stewardship; safe work practices (including an overview of the content of Safety Data Sheets (SDSs) (formerly material safety datasheets (MSDSs)), information on exposure guideline limits (Occupational Exposure Limits and Recommended Exposure Limits), information contained within the NIOSH pocket guide to chemical hazards, or the OSHA/EPA Occupational Chemical Database); isolation of work areas; safe storage and handling of chemicals; prevention of spills; and training in an overview of any existing chemical-specific worker training and certification programs, including but not limited to: lead abatement; lead renovation, repair, and painting (RRP); asbestos; diisocyanates (auto-refinishing and spray polyurethane foam); pesticide worker protection standards; Per- and Polyfluorinated Substances (PFAS); Polybrominated diphenyl ethers (PBDEs)/ Hexabromocyclododecane(HBCD); and others.

- Training in energy efficiency and alternative energy technologies, such as training in retrofitting technologies, in order to prepare brownfield sites for renewable energy installation for reusing and redeveloping former brownfield sites.

What is an appropriate amount of information to include when 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 below for example training course descriptions. Note that 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 employees.

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

Where can I find information about certified instructors who can deliver the needed training we are proposing to deliver in our grant application?

While EPA does not suggest, recommend, and/or endorse specific instructors, several EPA programs have databases of certified instructors who can deliver different types training.

OSHA certificates and other credentialed training are regulated, such as EPA's Lead Renovation, Repair and Repainting Program and asbestos training. As such, they may require authorized instructors and/or approved curriculum. It is important that program administrators understand and verify that training is delivered in accordance with federal, state, tribal, and/or local requirements. Note that contract instructors must be hired in compliance with competitive procurement requirements in 2 CFR Parts 200 and 1500 and 40 CFR Part 33, as applicable.

A significant amount of training can be provided by individuals experienced in their field of expertise. Additional instructional staff may be found in the following organizations, among others not listed here:

- Training consultants.
- Remediation pollution control firms.
- Construction, painting, and abatement firms.
- Potential employers (providing in-kind training).
- Current staff (trained for certification training).
- Federal, state, Tribal, and/or local environmental agencies.

- Local fire, water, and emergency response agencies.
- Recommendations from other BFJT grantees and training organizations.

BFJT grantees may need to train their trainers to meet certification requirements, however BFJT Grant funds cannot be used to train trainers. For example, the OSHA Training Institute offers a variety of certification programs that prepare trainers to deliver OSHA-approved courses. Programs such as PETE and SWA also provide opportunities for grantees to certify trainers at low or no cost.

How much of the grant should go toward funding direct training versus non- training programmatic expenses?

There is currently no requirement for how much of the grant should be allocated toward direct job training activities 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 job training 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 toward 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 grant application. Applicants are still encouraged to seek non-EPA supplemental funding and leverage additional funds to support non-environmental training costs whenever possible.

Can an applicant/grant recipient conduct a training cycle in another language?

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. Further, and as noted below, there are requirements in this program relating to job training participants being U.S. citizens or lawful permanent residents. Thus, the applicant should verify state, local, tribal, 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.

Can a grant recipient provide training to individuals who are not U.S. citizens or lawful permanent residents (Green card holders)?

No. Costs for training individuals who are not U.S. citizens (including the territories and U.S. possessions) and/or lawfully admitted to the United States 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).

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.

What are examples of ineligible uses of BFJT Grant funds?

A non-exhaustive list of examples of ineligible uses of BFJT grant funds is included below. Note, training that does not directly relate to facilitating the inventory of brownfield sites, site assessments, remediation of brownfield sites, community involvement, or site preparation are not eligible. Grant funds may not be used for the following activities:

- Training in general construction skills and trades (e.g., carpentry, plumbing, electricity, etc. relating to constructing buildings).
- Training in natural resource extraction or related processes, such as hydraulic fracturing, oil refinery, or mining operations.
- Training that seeks to test a product or is intended to expand a business, including training that seeks to expand construction and demolition debris recycling businesses for example, or training that is intended to only serve staff of an existing business who are already employed with that business.
- Training in equipment repairs.
- Conducting actual site assessments or cleanups, except within the context of on-the-job training.
- Training and monitoring that do not relate to conducting response activities often associated with actual cleanups (e.g., landscaping, demolition, and groundwater extraction), except within the context of on-the-job training. Assessment, cleanup, and associated activity costs must be funded through other sources.
- Construction or substantial rehabilitation of buildings or other facilities to house

training programs.

- Costs for training individuals who are not U.S. citizens or lawful permanent residents (i.e., Green card holders) are unallowable in the Brownfields Job Training Program.

- Training related to general or life skills and education activities, such as remedial classes in math and reading; job readiness training, such as developing resumes and acquiring interview skills; GED costs; website development; vehicle or medical insurance.

- Scholarship funds to support students' enrollment in college courses.

- Membership fees, such as fees required to join placement service organizations or environmental organizations.

- Providing food or light refreshments to employees, instructors, and trainees - except at graduation ceremonies.

- Foreign travel.

- A penalty or fine.

- Costs that are unallowable (e.g., lobbying and alcoholic beverages) under the Cost Principles discussed in 2 CFR Parts 200 and 1500, as applicable.

- Grant application preparation costs.

- Matching any other federal funds (unless there is specific statutory authority for the match). Note, CERCLA § 104(k)(7) does not provide the requisite authority. Grant funds may be used to match state or local funds, if authorized by the relevant state statute or local ordinance.

- Cost of compliance with any federal law, excluding the cost of compliance with laws applicable to environmental cleanup.

- Administrative costs, including all indirect costs and direct costs for grant administration in excess of five (5) percent of the total amount of EPA grant funding, with the exception of financial and performance reporting costs (which are considered allowable programmatic costs and not subject to the 5% limitation).

A.7. Community and Employer Partnerships

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.

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

Options to engage your target community in the proposed training program include but are not limited to: participating in events or activities already scheduled in your target community (e.g., town hall meetings, neighborhood advisory council meetings, church functions, etc.) and providing information about your proposed training program (e.g., making an announcement or distributing flyers); and, making a draft of your grant application available online (e.g., city's webpage) or at the public library and encouraging community input.

What type of roles might community-based organizations have in my proposed training?

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
- Non-environmental training (i.e., training not covered under this grant) that may be required to help participants retain employment; and
- In-kind contributions: staff time, supplies, transportation, daycare services, equipment required for training, or providing a facility to host events or training.

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

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 may 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.

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."

A.8. Administrative Costs

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

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

My organization's federally negotiated indirect cost rate is greater than 5%. Can we charge

the BFJT Grant 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 sets the amount of grant funds that can be spent on administrative costs to 5%. The 5% cap on administrative costs is for all administrative costs, including indirect cost rates and other administrative expenses. For example, if an entity wants to charge their full indirect cost rate to the grant, and their negotiated indirect cost 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.

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.

Does the limit on administrative costs for Brownfield Grants conflict with the requirement in 2 CFR § 200.414(c) for EPA to accept grant recipients' negotiated indirect cost rates?

No. The regulation states that, "A Federal agency may use a rate different from the negotiated rate for either 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.

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 § 200 (including 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 "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.

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.)

What are examples of allowable programmatic costs that are not subject to the 5% limit on administrative costs?

EPA has determined that direct costs for activities that are integral to achieving the purpose of the cooperative agreement are considered "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.

Can unrecovered indirect costs in excess of the 5% limit on administrative costs be counted toward leveraged funding other than voluntary cost share?

Yes. As stated in Section 3.A.6. 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.
Leveraged resources are not the same as voluntary committed cost sharing under 2 CFR § 200.1. Leveraged resources are non federal funds, services, or in kind support that complement the project but are not a legally binding commitment and are not part of the EPA assistance agreement budget. They may occur during the period of performance or after the grant ends. Applicants that wish to include leveraged resources should describe them and their sources in the Narrative Criteria Responses. Applicants must not include leveraged resources in the project budget - they are not part of the budget, and the costs do not have to be eligible or allowable. By contrast, voluntary committed cost sharing, which is not permitted under this funding opportunity, is a binding pledge that becomes part of the award budget and must meet all eligibility and allowability requirements.

If I name a consulting firm as a "partner" in my grant application, can I award that firm a sole source contract to perform work under the grant?

No. All contracts for services, supplies, and/or equipment to be funded with BFJT grant funds must be awarded consistent with the competitive procurement standards in 2 CFR Parts 200 (2 CFR 200.317-200.327) and 1500, as well as 40 CFR § 33, as applicable. As required by 2 CFR § 200.320(a)(1), for contracts that do not exceed the micro-purchase threshold (or a higher threshold as authorized in 2 CFR § 200.320(a)(1)), 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 the requirements in 40 CFR § 33 for the 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.