

## UPDATE 2 – Updated October 31<sup>st</sup>, 2019

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**NOTE TO APPLICANTS:** We are able to respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission, of the proposal, and requests for clarification about the announcement. We are unable to respond to questions requesting input on a project idea, format of a project or proposal, nor other project specific questions that may compromise the competitive process.

In addition, if you have not successfully been awarded an EPA grant previously, you may want to review the recorded webinar and/or presentation found here: <https://www.epa.gov/grants/epa-grants-award-process-webinars>

### New FAQ's

Q. Our work is in \_\_\_\_\_ and I am wondering if we qualify for the “Gulf of Mexico Program Reduction and Prevention of Trash in the Five Coastal States” grant? I was told that we are not in a watershed area of the Gulf. Can you please advise?

A. The location of the project must take place in one or more of the five gulf states (FL, AL, MS, TX and LA) **AND** have an impact on the Gulf of Mexico watershed. This means that the watershed (the HUC8) of where the project will take place must be in the Gulf of Mexico drainage basin. I did a quick search on \_\_\_\_\_ and it looks like you are not in the Gulf of Mexico watershed, which would make a project in your city ineligible, but please let me know if there is other data you have that supports the city being in the Gulf of Mexico watershed.

Q. Is there a limit to the number of applications you will accept from a single institution? In other words, should we coordinate an internal selection process to ensure that only one application goes forward?

A. There is no limit to the number of proposals an individual can be involved in nor the number of proposals an organization can submit. We do, however, receive a high volume of proposals and are only able to fund a small percentage.

Q. Is a Council of Governments (COG) eligible to apply? If eligible, are COGs eligible under the category called “state and local governments” or “other public or non-profit organizations?”

A. Yes, Council of Governments are eligible to apply. Council of governments are eligible under state and local governments.

Q. Can you give me a call about the EPA Trash Free Waters grant?

A. To ensure a fair competition and equal access to information, we are requesting that any questions be directed to this email box rather than answered via the phone.

Q.

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## Overview

Q. How much funding is available for this RFA?

A. The total estimated funding expected to be available is approximately \$5 million unless additional funding (e.g. FY 2019 funding) becomes available.

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

A. Funding for the Gulf of Mexico Program 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 a Proposal

Q. Where do I start?

A. You should start by closely reading the funding announcement. Determine your eligibility by reviewing Section III, Eligibility Information. Carefully consider the Program Elements (Section I.B) and Evaluation Criteria (Section V.A) to develop your proposed activities to achieve specific outputs and outcomes in a manner that will address the evaluation criteria.

Q. What kind of materials do I need to submit for the proposal?

A. To be considered for a GMP Grant, EPA requires that each submission contain a set of common elements that are described in Section IV.C (Content of Proposal Submission.) Section IV.C goes into detail about every item that must be included in the proposal package.

Q. What is the proposal submission deadline?

A. Proposals must be submitted through Grants.gov as stated in Section IV of this announcement (except in the limited circumstances where another mode of submission is specifically allowed for as explained in Section IV.A) on or before the proposal submission deadline of **11:59 ET on November 22, 2019**.

Q. How will EPA review proposals?

A. Please see Section V.B and V.C of the RFA.

Q. Are applicants required to follow the format detailed in section IV.C. of the RFP under Proposal Submission Content?

A. The format in section IV.C. of the RFP is provided as guidance intended to be a helpful organizational tool to the applicant and is not a requirement for submission.

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

A. There is no limit to the number of proposals an individual can be involved in nor the number of proposals an organization can submit. We do, however, receive a high volume of proposals and are only able to fund a small percentage.

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## Eligibility/Project Eligibility

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

A. Please refer to Section III.A. of the RFA.

Q. What is ineligible for funding?

A. Section III.C in the RFA identifies ineligible activities. EPA also conducts a threshold eligibility review of all proposals (Section III.D). Applicants deemed ineligible for funding consideration as a result of the threshold eligibility review will be notified within 15 calendar days of the ineligibility determination.

Q. A funding idea was submitted and GMP was asked for input and/or requested a phone call to discuss project. The following response was provided to all potential applicants who requested input on their specific project idea or design.

A. In order to ensure a fair competitive process, the EPA's Gulf of Mexico Program does not provide specific input on project ideas to applicants.

Q. Are preaward 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. Should the Gulf of Mexico regions' watersheds be selected as the study area for the grant proposal?

A. As stated in the RFA, the projects place of performance must take place in one or more of the five gulf states (Texas, Louisiana, Mississippi, Alabama, Florida) and must be in the Gulf of Mexico watershed. The place of performance should identify where the project will take place.

Q. Should activities be restricted to a single HUC watershed? Or can we combine watersheds? If the latter, is there a limit to the number?

A. The HUC12 needs to be identified if there is a water quality output as part of the project. The project does not have to be restricted to one HUC watershed. There is no limit to the number of HUC watersheds that can be identified/combined, just be sure to identify in the project which HUC watersheds are included in/affected by the project proposal AND please ensure the place of performance is in one or more of the five gulf states AND in the Gulf of Mexico watershed.

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## Environmental Outputs and Outcomes

Q. What are "Outputs and Outcomes"?

A. Outputs and outcomes are explained in Section I.C.2 of the RFA. The terms outputs and outcomes are derived from the EPA's increased focus on environmental results (EPA Policy Order 5700.7 Environmental Results). Therefore, 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: Does a detailed QAPP need to be submitted as part of the proposal?

A. No, if selected for funding, a detailed QAPP will be requested to be submitted to EPA for approval. Your proposal should include the expected tasks of preparing the QAPP in your workplan, budget and timeline. Only awards expected to exceed \$200,000 in federal funding AND involve the generation or use of environmental data will need to submit a QAPP if selected for funding.

Q: How long does EPA approval of a QAPP usually take?

A. EPA's GMP Office estimates two weeks for an individual QAPP's approval.

Q. We are currently working on our application for the GMP-RFP, and have run into a question about the Environmental Data Statement. Based on the information provided in the RFP and links, we have drafted the following statement:

"We acknowledge that if funded for this project, we will be required and are prepared to demonstrate competency to assess the quality of work to meet project requirements, and acknowledge that a Quality Management Plan (QMP) and/or Quality Assurance Project Plan (QAPP) may be required."

Is this what this section is requiring, or do we need to provide further demonstration of competency (ex. provide current accreditation or certification certificate with scope of accreditation and accrediting body plus contact information) attached to the proposal?

A. A statement, such as what is written, is all that is needed. It is a step designed to ensure that the applicant is fully aware that if data collection is planned and the award is over \$200k, that a QAPP will be required. In addition, as per the example on page 25, please schedule time for QAPP development and approval. *If the organization does not have an EPA approved Quality Management Plan, please not that this must also be developed and approved by EPA.*

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## Match Requirement

Q. Is there a match requirement?

A. Neither matching nor cost share funds are required under this competition. Cost sharing will not be evaluated as a part of 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 "coalition" or "consortium." 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. Reimbursable Agreement- 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.

Grant recipients MAY NOT enter into subgrants with federal agencies as part of their project activities. The only way to partner with a federal agency is through the reimbursable agreements described above, which is a type of contract.

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## Standard Form (SF) 424 and SF 424 A

Q. I am filling out the online budget form for this grant application. We are applying for 2 years of funding. As I understand the directions, I am to include costs for Year 1 in Section A. Does the same apply to Sections B or C, or should I include amounts for the full 2 years? I have one more question (which may be obvious to most), in Section A, is the Grant Program Function the same as the name of the program for which we are requesting funding?

A. Include the total amount for 2 years in Section A. This should be the cumulative amount for both years. Do not separate the years. In Section A, for the Grant Program Function or Activity, use the title of the RFP: "Gulf of Mexico Program Cooperative Agreements 2017".

Q. How do we answer question 19 in the SF 424?

A. Please follow this link: <https://www.whitehouse.gov/wp-content/uploads/2019/02/SPOC-February-2019.pdf>. If your state is listed on this link, your project will need to be submitted to your state for review and select a or b as applicable. If your state is not listed, please select C.

Q: If the grant request is a small part of a larger project, how should that be reflected in the budget?

A. Budget Form 424A should only reflect the cooperative agreement request. If other funding is contributing to the successful completion of your project, please provide that information narratively in your project description. It may also be information added to the detailed budget table and narrative, but should be kept in separate column from activities identified as being funded by the grant or match.

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## Budget

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). In order to charge interest costs to the grant, the applicant must have an up-to-date approved indirect cost rate agreement with its cognizant agency (the federal agency the applicant receives the most funding from). EPA does recognize indirect cost agreements negotiated with other federal agencies.

Q. What if we don't have an indirect cost rate agreement?

A. Any non-Federal entity that has never received a negotiated indirect cost rate may elect to charge a de minimis rate of 10% 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, Appendix A of the RFA provides a link to EPA's Interim Budget Guidance as well as helpful hints and sample language. If you have a question about a particular item, please feel free to email the question to [gmp-rfp@epa.gov](mailto:gmp-rfp@epa.gov).

Q. Can these projects fund international travel?

A. It depends on the relevance of the travel to the project. In any case where international travel is requested, however, the award will need to go through an additional layer of review and approval which may cause delays to the project.

Q. Is tuition for a graduate student assistant an allowable cost under either "personnel" or "other"?

A. Tuition is an allowable cost if it meets the guidelines set here:

§ 200.466 Scholarships and student aid costs. (a) Costs of scholarships, fellowships, and other programs of student aid at Institutes of Higher Education are allowable only when the purpose of the Federal award is to provide training to selected participants and the charge is approved by the Federal awarding agency. However, tuition remission and other forms of compensation paid as, or in lieu of, wages to students performing necessary work are allowable provided that: (1) The individual is conducting activities necessary to the Federal award; (2) Tuition remission and other support are provided in accordance with established policy of the IHE and consistently provided in a like manner to students in return for similar activities conducted under Federal awards as well as other activities; and (3) During the academic period, the student is enrolled in an advanced degree program at a non-Federal entity or affiliated institution and the activities of the student in relation to the Federal award are related to the degree program; (4) The tuition or other payments are reasonable compensation for the work performed and are conditioned explicitly upon the performance of necessary work; and (5) It is the IHE's practice to similarly compensate students under Federal awards as well as other activities. (b) Charges for tuition remission and other forms of compensation paid to students as, or in lieu of, salaries and wages must be subject to the reporting requirements in §200.430 Compensation—personal services, and must be treated as direct or indirect cost in accordance with the actual work being performed. Tuition remission may be charged on an average rate basis. See also §200.431 Compensation—fringe benefits.

The cost would be identified under Other.

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## Other Questions

Q. The application has this statement about partial funding:

“In appropriate circumstances, EPA reserves the right to partially fund proposals by funding discrete portions or phases of proposed projects. If EPA decides to partially fund a proposal, it will do so in a manner that does not prejudice any applicant or affect the basis upon which the proposal was evaluated and selected for award and therefore maintains the integrity of the competition and selection process.”

Does this mean that a grant application can be submitted for a project if it is for the engineering and studies needed to design a project (what we refer to as Phases 1 and 2) which has the ultimate goal of meeting one of the priorities stated in the project after construction (Phase 3)? Or is this grant only for projects which can go straight into construction?

A. The partial funding clause (referred to above) enables EPA to fund a portion of an applicant’s proposal, but is not intended to enable a phased funding approach for a project. A "construction" project in the traditional term of building construction cannot be funded with this RFA. In addition, in order for a proposal to meet the threshold criteria for evaluation it must result in meeting the outputs identified in I.B.2. of the RFA).

Q. Can you please clarify what should be included in the Expenditure of Awarded Grant Funds section? What is meant by applicant's approach, procedures and controls? Is it safe to assume that this is referring to a timeline and benchmarks for the timely use of the funds over the course of the funding period?

A. It is not referring to a timeline and benchmarks for the timely use of the funds over the course of the funding period but rather it is referring to the internal controls and procedures already established by your organization to monitor and track expenditures ensuring that awarded grant funds will be expended in a timely and efficient manner.

Q. Are letters of support encouraged or required?

A. Letters of support from partners are required to support description of partner involvement. Letters of support are not included in the page limit.

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

A. A references cited page 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 GMP award?

A. It is neither an advantage or disadvantage. All proposals will be evaluated based on the criteria identified in the RFP.

Q. Where should the Indirect Cost Rate Agreement be uploaded into the Grants.gov package?

A. The Indirect Cost Rate Agreement 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. We are able to respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the proposal and requests for clarification about the announcement. You may submit your questions via email to [gmp-rfp@epa.gov](mailto:gmp-rfp@epa.gov).

\*This document will be updated weekly to include additional Q&As.

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