

Grants Working Session

Regional Tribal Operations
Committee (RTOC)

Spring 2020

April 30, 2020

What we will cover today



Grants Branch Roles



COVID-19 Administrative Flexibilities

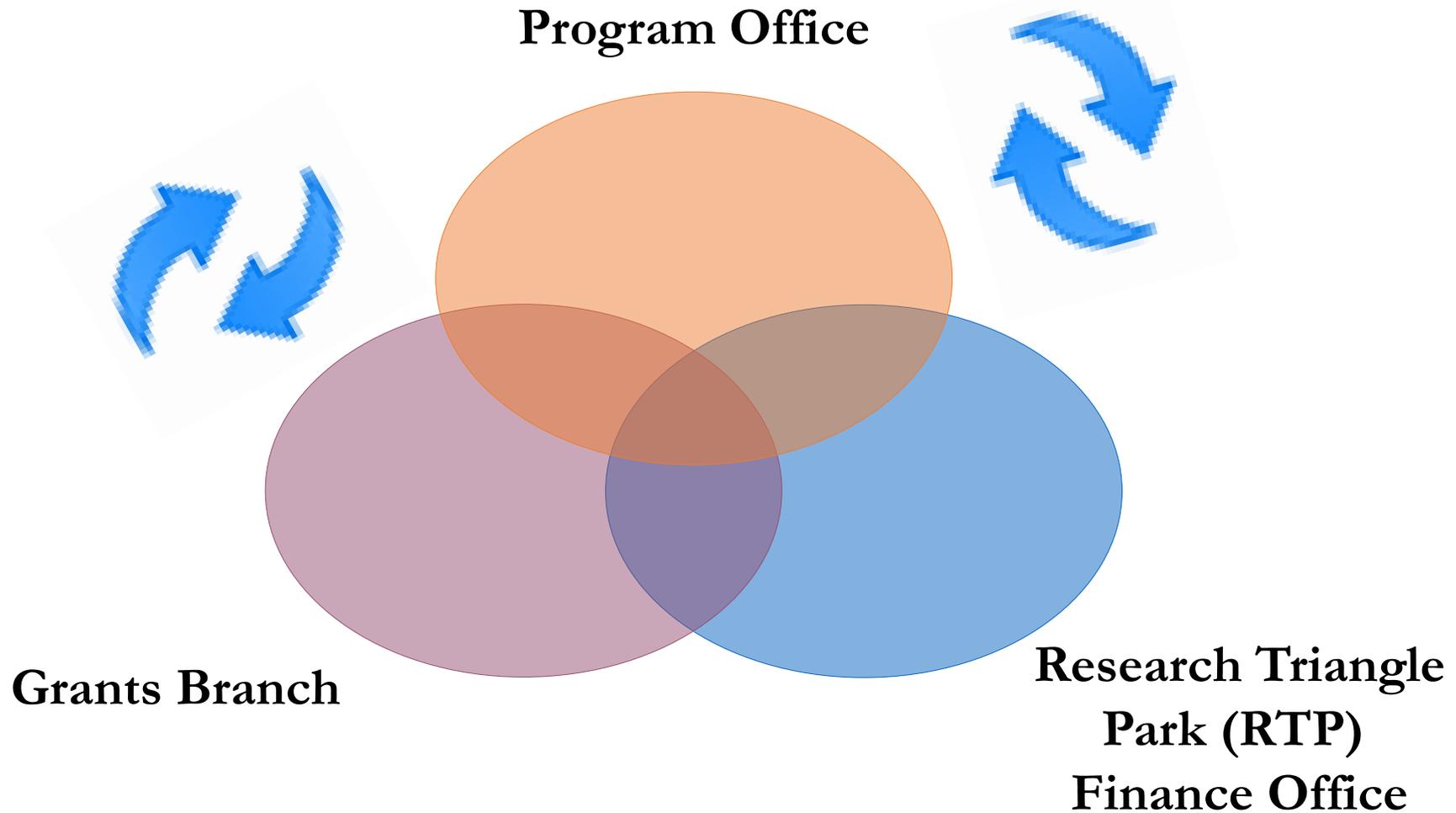


RTP Finance Center Transition

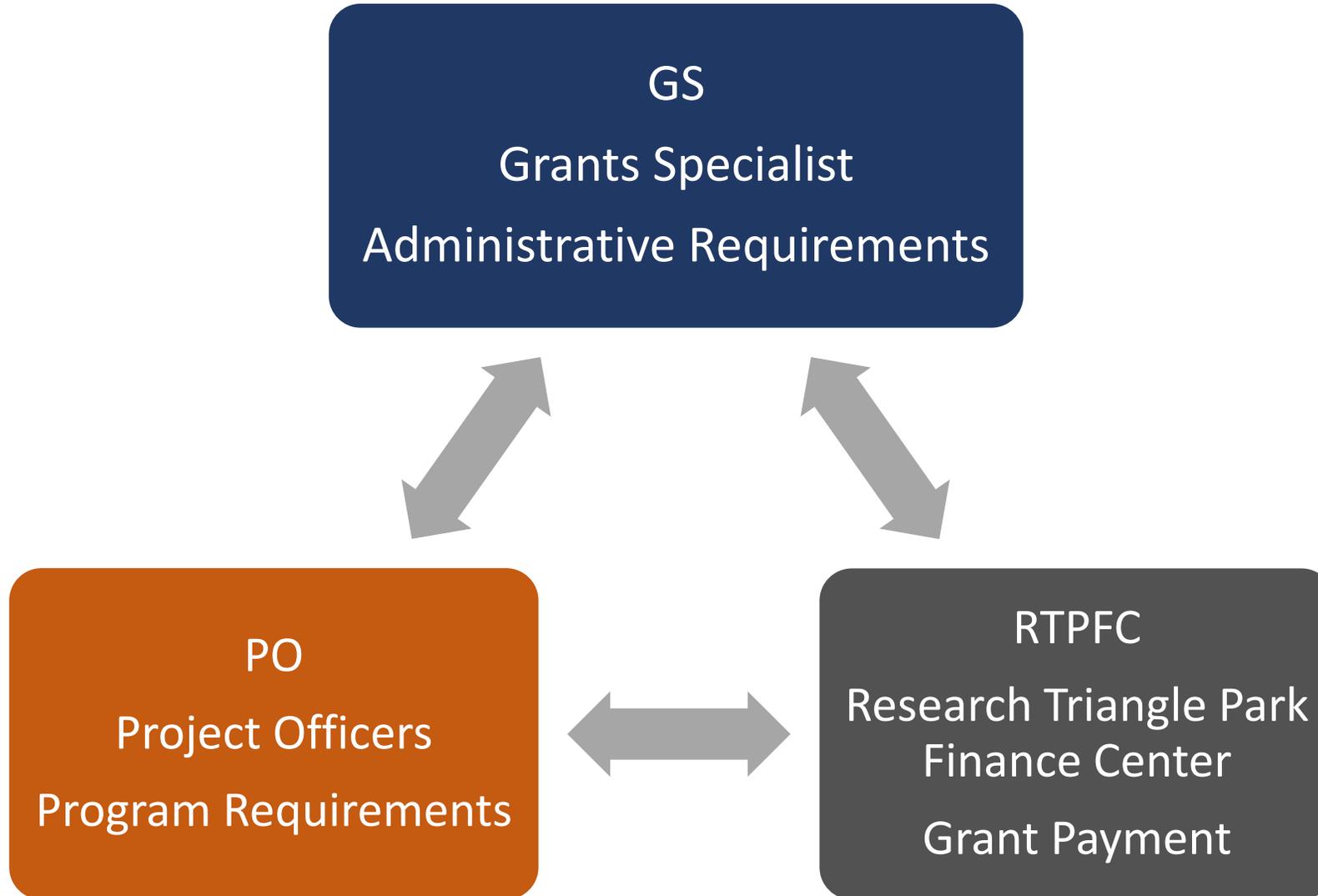


Improper Payment, Budget Revisions & other Updates

EPA Grant Coordination



Triad of Grants Management



Role of the Grants Specialist



Roles & Responsibilities

Region 9 EPA Grants Branch

- Reviews applications for allowable, allocable, etc., costs & other legal requirements
- Prepares grant agreement that meet all Federal requirements
- Electronically signs grant agreement
- Monitors & evaluates administrative & financial requirements
- Performs final grant closeout

Role of the Project Officer



Roles & Responsibilities

EPA Program Office

- Makes Funding Decisions
- Approves Applications (work plans and budgets)
- Recommends Funding to Grants Branch
- Manages Project/Program
- Evaluates Grant Performance

Roles & Responsibilities

EPA Research Triangle Park (RTP) Finance Center

- Records grants in accounting system
- Sets up payment methods
- Monitors grant payments (ASAP)
- Processes Federal Financial Report (FFR) SF-425
- Provide info to auditors conducting Single Audits

GS Workload

Region 9

Grants Assignments

- GSs have 40-70 grants per specialist
- Each GS is assigned grants primarily by Grant Program areas (i.e., Air & Water; Superfund & Waste, etc.)
- Tribes are assigned one GS and work on all grant programs (where possible)

Subject Matter Workleaders

- Each GS are subject matter workleaders in the following areas, for example:
 - Grant: Regulations, Policies, Guidance, & Procedures, Post-Award Monitoring, Compliance, etc.

Questions?

Common Questions – COVID-19 Flexibilities

RAIN-2020-G02

- April 29, 2020 – Office of Grants and Debarment (OGD) issued the RAIN-2020-G02
- This provided information to applicants and recipients impacted by the COVID-19 crisis.
- Covers topics such as:
 - requesting waivers, due date extensions, extraordinary cost allowability, and application submission issues during the public health emergency.

Link:

- [EPA Grants COVID-19 FAQs](#)

Common Questions – COVID-19 Flexibilities

RAIN-2020-G02

Most Common Questions

Q: Can EPA grant recipients continue to compensate employees whose work on EPA financial assistance agreements has been interrupted due to the impact of COVID-19?

A: Yes, as long as the recipient follows its policies and procedures and is also consistent with compensation of employees whose salaries or benefits are funded from other federal and nonfederal sources.

For full answer, see page 3*.

*EPA Frequent Questions on Grant Issues in Response to the Novel Coronavirus (COVID-19) Public Health Emergency: [EPA Grants COVID-19 FQs](#)

Common Questions – COVID-19 Flexibilities

RAIN-2020-G02

Most Common Questions

Q: If an EPA grant recipient permits their employees administrative leave to comply with social distancing guidance from public officials, are the costs allowable?

A: There is a regulatory provision in 2 CFR 200.431 Compensation-fringe benefits governing administrative leave and other fringe benefits for recipient employees working on grant funded projects, if administrative leave is necessary.

For full answer, see page 4*.

*EPA Frequent Questions on Grant Issues in Response to the Novel Coronavirus (COVID-19) Public Health Emergency: [EPA Grants COVID-19 FQs](#)

Common Questions – COVID-19 Flexibilities
RAIN-2020-G02
Most Common Questions

Q: Will EPA modify workplans, adjust budgets, and extend project periods of grants if necessary?

A: Yes, however, EPA will comply with any statutory restrictions.

For full answer, see page 5*.

*EPA Frequent Questions on Grant Issues in Response to the Novel Coronavirus (COVID-19) Public Health Emergency: [EPA Grants COVID-19 FQs](#)

Common Questions – COVID-19 Flexibilities
RAIN-2020-G02
Most Common Questions

Q: Will EPA extend the due dates for reports required under 2 CFR 200.343 to close out grants if the recipient cannot provide the information due to COVID-19 related disruptions?

A: Yes, provided the recipient submits the report within one year of the expiration of the performance period for the grant.

For full answer, see page 8*.

*EPA Frequent Questions on Grant Issues in Response to the Novel Coronavirus (COVID-19) Public Health Emergency: [EPA Grants COVID-19 FQs](#)

Common Questions – COVID-19 Flexibilities

RAIN-2020-G02

To Sign up to receive the RAIN:

- Visit EPA.gov under Grants
- [Subscribe to the EPA Grants Update Listserv](#) to receive periodic updates by email.

Questions?

Las Vegas Finance Center & Research Triangle Park Finance Center Transition

The Las Vegas Finance Center (LVFC) has closed and the Finance Center at Research Triangle Park (RTPFC) is now open for business.

Las Vegas Finance Center & Research Triangle Park Finance Center Transition

- RTP Finance Center has a fully functioning group email box: rtpfc-grants@epa.gov
- RTP Finance Center: <https://www.epa.gov/financial/grants>
- **Contact Information for Region 9 assigned Finance Specialist:**

Kesha Baldwin Nickerson

(919) 541-5288

BaldwinNickerson.Kesha@epa.gov

- The new address for recipients to send refund checks (for non-routine cases):

US Environmental Protection Agency,

RTP-Finance Center (Mail Code AA216-01),

4930 Page Rd. Durham, NC 27703

Questions?



FY2020 Improper Payment Reviews



WHAT?:

- Improper Payment - means any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments). Also includes any payment to an ineligible recipient, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received
- Improper Payment Reviews are financial reviews of Recipient's randomly selected grant drawdowns. IP Reviews are completed by the Office of the Chief Financial Officer's - Office of the Controller (OCFO-OC) along with Office of Grants and Debarment (OGD).
- Follow-up, if necessary is done by R9 Grants Specialist and EPA Project Officer.

FY2020 Improper Payment Reviews



WHY?:

- Required by the Improper Payment Elimination and Recovery Act (IPERA) of 2010
- Continuing EPA's Grants management oversight efforts to ensure grant dollars are being used for their intended purpose.
- Ensuring Recipients are maintaining financial records supporting each grant drawdown

WHEN?:

- Annual cycle of reviews, typically completed in Nov thru April timeframe
- FY2020 (grant drawdowns made in FY2019 are subject to review)

FY2020 Improper Payment Reviews

HOW?:

- Recipient is notified via email by OCFO of the IP Review and identifies selected drawdowns (emails come from PaymentIntegrityTeam@epa.gov)
- Recipients are given 30 days to email or mail supporting documentation to OCFO
- Deadline extensions have been granted but should be approved by OCFO
- OCFO will complete the initial review of documentation
- OCFO may contact the Recipient to clarify the submission



FY2020 Improper Payment Reviews

IP Reviews require that supporting documentation is provided for 100% of each grant payment selected for review.

Supporting Documentation Examples (not limited to):

- vendor invoices
- copies of purchase orders
- payroll records (showing hours worked and the hourly wage)
- travel authorizations
- travel vouchers
- travel receipts (lodging, car rental, etc.)
- any other source document supporting your payment request
- financial policies and procedures related to your supporting documents
- Copy of your current approved indirect cost rate agreement (if applicable)
- Copy of your general ledger (can be submitted to assist with the review, not as a substitute for support docs)



FY2020 Improper Payment Reviews

- **19** Recipients had grant drawdowns reviewed
(Recipient types vary – Tribes, States, Local Governments, Non-profits, etc.)
- **57** total grant drawdowns reviewed in this annual cycle
- **\$4,852,253** total dollar amount of drawdowns reviewed
- **\$74,173** total dollar amount of questioned costs
- **1.5%** of drawdown dollars questioned



FY2020 Improper Payment Reviews



- Relatively minor findings and some questioned costs
 - Missing invoices
 - Insufficient documentation (needs to be specific to each grant and drawdown)
- Overall R9 IP Reviews were generally positive with minimal findings
- Demonstrates Recipients' ability to properly manage grant funds by effectively maintaining financial records to support grant payments

FY2020 Improper Payment Reviews

Questions???

Contact Information

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415-972-3665



Other Grant Updates

Responses to Action Items from Winter RTOC

- At this time, there are no major (administrative) regulatory changes that are open for comment.
- Provide clarification on difference between 2 CFR 200.308 and 235 at Spring RTOC
- Grants Branch is finalizing our Region 9 Grants Handbook
 - Provides tools and samples to help recipients manage grants

Action Items Response – Budget Modification

Provide clarification on 2 CFR 200.308

2 CFR § 200.308 - Revision of budget and program plans.

(a) The approved [budget](#) for the Federal award summarizes the financial aspects of the project or program as approved during the Federal award process. It may include either the Federal and non-Federal share (see [§ 200.43](#) Federal share) or only the [Federal share](#), depending upon [Federal awarding agency](#) requirements. It must be related to performance for program evaluation purposes whenever appropriate.

(b) [Recipients](#) are required to report deviations from [budget](#) or project scope or objective, and request prior approvals from Federal awarding agencies for [budget](#) and program plan revisions, in accordance with this section.



Workplan and
Budget
Modifications

- When EPA prior approval is necessary

40 CFR Part 35, Subpart B

Prior written approval from EPA and/or a formal grant amendment for the following:

- Significant post-award changes 
- Increases in grant amounts 
- Project period extensions 

Further details can be found at:

[**§35.514 Amendments and other changes**](#)

**POST AWARD CHANGES
CONTINUING ENVIRONMENTAL PROGRAM (CEP) AGREEMENTS FOR TRIBES
AWARDED UNDER 40 CFR PART 35, SUBPART B ****

	FORMAL AMENDMENT REQUIRED Part 35.514(b)*	PRIOR WRITTEN APPROVAL REQUIRED FROM EPA Part 35.514(a)*	PRIOR APPROVAL NOT REQUIRED Part 35.514(c)
<p>APPLICABLE TO:</p> <ul style="list-style-type: none"> - TRIBES - INTERTRIBAL CONSORTIA OR CONSORTIUM 	<ul style="list-style-type: none"> - Revisions which will result in the need for additional funding - Extend period of performance or availability of funds <p><u>NOTE:</u> Should recipients begin implementing a change before the formal amendment has been signed/approved by EPA, they do so at their own risk. EPA will notify recipients in writing if requested changes are disapproved.</p>	<ul style="list-style-type: none"> - <u>Significant</u> changes to workplan commitments and/or budget. <p><u>NOTE:</u> → “Significant” is not defined under this subpart. Therefore, recipients are encouraged to consult with the EPA Project Officer -- to determine “significant” and “insignificant” changes -- <u>before</u> changing the EPA-approved workplan.</p> <p>→ <u>Documentation</u> of requests and approvals for changes or revisions, including associated budgets, is required.</p>	<ul style="list-style-type: none"> - Except for situations described in §35.514(a)* and (b)*, recipients do not need to obtain approval for changes, <u>unless</u> EPA determines that additional approval requirements should be imposed on a specific recipient, on a case-by-case basis. <p><u>NOTE:</u> EPA will notify specific recipients in writing or by term(s) and condition(s) contained within the assistance agreements, if additional EPA approval requirements are imposed.</p>

** NOTE: This subpart does not supersede 2 CFR 200, Subpart E (Cost Principles) which identifies certain items of costs requiring prior approval.

Questions

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