

Fiscal Year 2021 Frequently Asked Questions for Environmental Workforce Development and Job Training Grants

EPA prepared these Frequently Asked Questions (FAQs) and Answers to assist prospective applicants with preparing Environmental Workforce Development and Job Training (EWDJT) grant applications for the FY21 competition. Please review the [FY 2021 Guidelines](#), also referred to as the Request for Applications (RFA), when preparing your application. If information in the FAQs differs from information in the statute, regulation, or the Guidelines, then the statute, regulation, or the Guidelines will take precedence. The FAQs will be updated periodically as we continue to receive questions.

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I. Changes to the EWDJT Guidelines

Q1. How have the EWDJT Guidelines changed?

A. General Changes

1. EPA is issuing Request for Applications (RFAs) instead of Request for Proposals (RFPs)
2. Required Application Materials: The following forms and documents are now required in order to submit an application via www.grants.gov.
 - a. Application for Federal Assistance (SF-424)
 - b. Budget Information for Non-Construction Programs (SF-424A)
 - c. Pre-award Compliance Review Report (EPA Form 4700-4)
 - d. EPA Key Contacts (Form 5700-54)
 - e. Cover Letter and Narrative.
 - f. Required Attachments.

As in years past, EPA has provided the estimated funding amounts for each program office in addition to the available Brownfields funding as shown [below](#). It is important to take these funding amounts into account when planning what training your program will provide and at what level (i.e., awareness, intermediate, or advanced).

B. Changes to Threshold Criteria

Two new threshold criteria have been added this year. The first is Criterion 7- Applicants must include 2 separate plans: 1. how you propose to deliver EWDJT trainings in person under normal circumstances and 2. how you propose to deliver the EWDJT trainings if in-person training (as proposed under plan 1) is not possible due to impacts related to COVID-19 (e.g., under quarantine situations, if social distancing is required in your locale). Threshold criteria are evaluated on a pass or fail basis. Applicants who fail to address a threshold criterion may not be provided the opportunity to respond or submit clarifying information. If a threshold criterion is not responded to, the application will not be considered for funding.

The second is Criterion 9 - Applicants who received an EWDJT Grant from EPA in Fiscal Year 2020 (FY20) are not eligible to apply under this competition. Grantees who received EWDJT funding in FY20 may not apply under this competition under any circumstance, even if the applicant proposes to serve a different city or target area. Applicants who received an EWDJT grant in, or before, Fiscal Year 2018, and who did not receive funding in FY20 as described above, are eligible to apply for funding under this competition. Please list the most recent year you received an EWDJT Grant from EPA, or if you have not received an EWDJT Grant in the past, in your cover letter.

There are nine threshold criteria, found in Section III.C of the RFA, that need to be met in order for the applicant to be considered in this competition:

1. Applicant Eligibility
2. Demonstration that Proposed Project Does Not Duplicate Other Federally Funded Environmental Job Training Programs.
3. Required OSHA 29 CFR 1910.120 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Training
4. Federal Funds Requested/Funding Amount
5. Substantial Conformity with Instructions and Format Requirements
6. Training Curriculum Chart Indicating the Cost of Each Course
7. Plans for Delivering Training
8. Target Area
9. Previous Funding Requirement

Note: Responses to all Threshold Criteria must be included in the Cover Letter.

C. Changes to Ranking Criteria

The total point value of the ranking criteria increased from 100 points to 109 points for FY21. As in recent years past, applicants must provide cost estimates for each course in their training curriculum, determine what percentage of their budget is allocated to each training course, and indicate how many times the course will be offered. Training that is ineligible, such as training in construction or carpentry, or life skills training, must not be included in the proposed EPA budget. Please refer to Section I.D of the RFA for more information.

II. Information on Submitting the Application

Q2. What is the deadline for submission in FY21?

Applications are due September 22, 2020 at 11:59 p.m. Eastern Time. **Applications received after 11:59 p.m. ET on September 22, 2020 will not be considered for funding.**

Q3. How do I submit my application?

Your organization's Authorized Organization Representative (AOR) must submit your complete application package electronically to EPA through www.grants.gov. Applications must be received no later than 11:59 p.m. ET on September 22, 2020. Please allow enough time to successfully submit your application package and allow for unexpected errors that may require you to resubmit.

In order to submit an application through www.grants.gov, you must:

1. Have a unique entity identifier (e.g., active DUNS number),
2. Have an active System for Award Management (SAM) account in www.sam.gov,
3. Be registered in www.grants.gov, and
4. 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](#).

Q4. How do I know if my grant application was received by the deadline?

The grant application and the required federal forms comprise your application package. Your organization's Authorized Organization Representative (AOR) must submit the application package electronically through www.grants.gov. If submitted successfully, the AOR will receive a **Submission Receipt** email confirming the application package was initially received. Note, 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 indicating the application package was "rejected with errors" and what the error is. This gives you the opportunity to resolve the error 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 Help Desk 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 2 of the Guidelines, and the [Tips for Submitting Brownfields Grant Applications](#) document on EPA's website. Additionally, the www.grants.gov website has an [Applicant Training page](#), which includes a series of videos on various aspects of the submission process.

Q5. 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.

Q6. Can I apply for grant funding if the 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.

Q7. 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.

Q8. 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're not registered yet, it is the EBiz POC within your organization who must register your organization with www.sam.gov.

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

Q9. My organization has several departments and corresponding DUNS numbers? Can I use a different department's DUNS number to submit the brownfields application package?

No. You must use the DUNS number assigned to the department that is submitting the application package. Additionally, this DUNS number must correspond to the DUNS number in www.sam.gov.

Q10. Can I use another organization's DUNS number to submit the application package?

No. You must use the DUNS number assigned to the organization that is submitting the application package. Additionally, this DUNS number must correspond to the DUNS number in www.sam.gov.

Q11. The 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 Cover Letter, Narrative, responses to the threshold criteria, required attachments, etc.) into one pdf file. This ensures that EPA receives your entire submission and the submission is in the order that you intended. Please review the [Tips for Submitting Brownfields Grant Competition Proposals](#) for additional application submission tips.

Q12. 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" is 66.815 and the "CFDA Title" is Environmental Workforce Development and Job Training Cooperative Agreements.

Q13. 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:

- a. This application was made available to the State under the E.O. 12372 Process for review on (enter date).*
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.*
- c. 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 EWDJT program, therefore option c. should be selected.

III. General Guidelines and Application Process Questions

Q14. How can I receive help in understanding and responding to the FY21 Environmental Workforce Development and Job Training Grant Guidelines?

EPA will be hosting a webinar for prospective applicants that will explain the process of applying for an EWDJT grant and how applications will be evaluated. This webinar will be held on August 6, 2020 at 3:00 p.m. ET. A copy of the presentation will be available on [EPA's website](#) and a recording of the webinar will be posted once it is complete.

EPA Regional Job Training Coordinators may respond to questions regarding threshold eligibility criteria, administrative issues related to the submission of the application, 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 ranking criteria. EPA's limitations on staff involvement with grant applicants are described 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 VII of the RFA or [on EPA's website](#).

While EPA may only provide limited pre-application assistance, the Hazardous Materials Training and Research Institute (HMTRI), an EPA cooperative agreement recipient that provides technical assistance to prospective EWDJT grant applicants, may provide greater assistance to applicants and may be able to review segments of a drafted application. Note, however, that HMTRI may not prepare applications and that

applicants are responsible for the content of their applications. Applicants may contact Heather Ballou at HMTRI to request technical assistance at: hkballou@eicc.edu or by calling (563) 441-4093.

Q15. What does the FY21 Environmental Workforce Development and Job Training grant application process entail?

To apply for an EWDJT grant, one must submit an application through www.grants.gov. In order to use www.grants.gov, one must register their organization, obtain a DUNS number and register with www.sam.gov. This process can take weeks to complete and applicants are strongly encouraged to begin their 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](#).

Q16. How will my application be evaluated?

In order for your application to be evaluated, it must first pass all nine threshold criteria. Threshold criteria are evaluated on a pass/fail basis. If an applicant fails to meet any of the threshold criteria listed in Section III.C of the RFA, the application will be disqualified from further consideration and the applicant will be notified within 15 business days of the determination.

Applications that pass threshold review will be scored on their response to the ranking criteria by a national review panel. The national review panel will base their review on the evaluation criteria outlined in Section V of the Guidelines. Applicants should respond to each and every ranking criterion in Section IV of the Guidelines. Applications are scored out of 109 points.

Q17. What is the maximum amount of money that an applicant may be awarded?

An eligible applicant may apply for up to \$200,000 per grant for eligible activities. Actual funding is dependent upon the availability of funds through the federal budget process and EPA reserves the right to partially fund applications or make no awards at all.

In FY21, EPA anticipates awarding approximately 15 Environmental Workforce Development and Job Training grants at a total of \$3,000,000. Of the total \$3,000,000 available, the EPA estimates that the following funding amounts will be available to support the various types of training either at the awareness or advanced level, with the majority of funding being used to support brownfields assessment, cleanup, and hazardous waste related training:

- Brownfields hazardous waste assessment and cleanup training, including petroleum cleanup training: \$2,880,000
- Solid Waste Management or Cleanup training: \$15,000
- Superfund site cleanup and innovative and alternative treatment technologies training: \$25,000

- Wastewater treatment training: \$10,000
- Emergency planning, preparedness, and response training: \$20,000
- Enhanced environmental health and safety training: \$15,000
- Alternative energy technologies (e.g. solar installation, training in the preparation of formerly contaminated sites for renewable energy purposes, etc.): \$15,000
- Underground Storage Tanks: \$20,000

Q18. 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 (3 points). Failure to respond to this criterion will result in a score of zero.

Q19. How can I demonstrate my program is not duplicative of other federally funded environmental job training programs?

Applicants must demonstrate that their proposed training program does not duplicate other Federally-funded programs for environmental job training in your target community, including training provided through the EPA's Superfund Job Training Initiative (SuperJTI); the EPA's Environmental Justice Small Grants Program CFDA 66.604; and the EPA's Surveys, Studies, Investigations, Training, and Special Purpose Activities Relating to Environmental Justice Grants Program CFDA 66.309. Applicants must demonstrate that the proposed training project does not duplicate National Institute of Environmental Health Sciences (NIEHS) Hazardous Waste Worker Training programs in their target community or Department of Labor (DOL) grant funds that include brownfields remediation, renewable energy, HVAC, or other energy-related training or wastewater treatment technology operator training. Federal agencies maintain lists of these grant programs at the following websites:

EPA: www.epa.gov/superfund/superfund-job-training-initiative
www.epa.gov/environmentaljustice
 NIEHS: www.niehs.nih.gov/careers/hazmat/about_wetp/ecwtp/index.cfm
 DOL: <https://www.dol.gov/general/grants/howto>

If you are listed on any of these websites as a recipient, you must explain how services under your proposed EWDJT program will complement, but not duplicate the existing federal environmental job training activities in your targeted service area (i.e., different target audience, such as a different age group, differing types of certification training).

Q20. Are stipends or scholarships an eligible use of grant funds under this program?

No. Stipends for students, including on-the-job training costs or scholarship funds to support students' enrollment in college courses, are **not eligible** under this grant opportunity.

Costs associated with eligible participant support costs, including costs associated with transporting trainees to site visits during training or for trainees to get to and from class **are eligible**.

Q21. If my organization is successful in obtaining EPA funding, can we charge the costs we incurred for a consultant to prepare our grant application?

No. Costs for preparing your application are not an allowable direct cost.

Q22. Will EPA fund pre-award costs?

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.

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:

1. The applicant includes the pre-award costs in its application and the work plan negotiated with EPA;
2. EPA agrees that the costs are eligible and allowable when the Agency approves the scope of work for the grant; and
3. Any procurement contracts that are funded with pre-award costs comply with the competitive procurement requirements within the grant.

As provided in 2 CFR 200.458 pre-award costs must be incurred “. . . 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 Award Official to incur pre-award costs more than 90 days before award. Applicants selected for award will need to discuss any pre-award costs greater than 90 days with their EPA Project Officer to discuss the process for getting these costs approved.

IV. Applicant Eligibility

Q23. Who is eligible to apply for an Environmental Workforce Development and Job Training Grant?

Applicants must be either certain eligible **entities** as defined in CERCLA Section 104(k)(1) or other eligible **nonprofit organizations** as defined in 2 CFR Part 200. Eligible entities include a general purpose local unit of government; a 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 government; a governmental entity created by a state legislature; a regional council or group of general purpose units of local government; a redevelopment agency that is chartered or otherwise sanctioned by a state; a state; an Indian Tribe (other than in Alaska), or an Alaskan Native Regional Corporation and an 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. EPA welcomes and encourages applications from coalitions of such entities, but a single eligible entity must be identified as the legal recipient. Intertribal consortia, except consortia comprised of ineligible Alaskan tribes, are eligible to apply as well.

Other eligible nonprofit organizations include any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest; is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. Workforce Investment Boards that meet these criteria may be eligible nonprofit organizations. Public and nonprofit private educational institutions are eligible to apply. Nonprofit applicants must provide proof of their nonprofit status at the time the application is submitted.

Nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are **not** eligible to apply.

For-profit or proprietary training organizations or trade schools are **not** eligible to apply.

Q24. 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.

Q25. Can a nonprofit organization or eligible governmental applicant submit a joint application in partnership with a for-profit organization?

No. EPA awards Environmental Workforce Development and 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 EPA grant regulations, as applicable.

V. Training Program Structure

Q26. What training is required?

The only required training is OSHA 29 CFR 1910.120 40-hour HAZWOPER, beyond this, the applicant has the ability to design a curriculum as they see fit so long as the courses offered are an eligible use of grant funds.

Applicants may also choose to deliver any of the environmental trainings listed under Section I.B of the RFA. In FY21, these include:

- Solid waste management or cleanup training
- Superfund site cleanup (innovative and alternative treatment technologies) training
- Wastewater training
- Emergency response training
- Enhance environmental health and chemical safety training
- Advanced energy technologies

Q27. What constitutes Superfund site cleanup training (i.e. innovative and alternative treatment technology training)?

Innovative and alternative technologies training could include training such as:

- An array of biological/bioremediation techniques (including phytoremediation)
- Advanced excavation practices
- Treatment of groundwater and surface water
- In-situ (in place) treatment of contaminants in soil and ground water using physical, chemical and thermal techniques
- Rapid sampling and analytical approaches
- Advanced data management and visualization practices
- Dynamic or adaptive work strategies
- Green/sustainable remediation techniques, including use of renewable energy sources to power remediation systems

Q28. What constitutes wastewater related training?

Wastewater treatment related training could include topics such as:

- Wastewater treatment system operation
- Onsite/decentralized system installation or maintenance
- Wastewater careers awareness training

The level of training related to wastewater treatment provided in any given curriculum will depend on the jobs available in that specific community. Awareness training should include information that helps participants understand the wastewater basics and the types of wastewater careers and employment that may be available in their communities. Participants should also learn about the skills, education, or certifications necessary for different wastewater jobs.

The [‘Recruitment and Retention’ section of the Work for Water website](#) includes a presentation on water careers which can be used as a resource for developing an awareness curriculum. On this webpage, and the several links associated with it, there is also information on other water career websites, water career job descriptions, and a “competency model” that describes the foundational skills necessary for careers in the water/wastewater field.

If grant applicants are interested in stormwater or green infrastructure related training, [EPA’s website](#) provides many resources and information, including a [catalog of training opportunities for green infrastructure technologies](#).

There is no federally mandated operator training for wastewater professionals. Each state defines and develops unique operator licensing programs. Applicants should check with their state operator certification program to ascertain their specific certification requirements. Many states require that their wastewater service providers have documentation of a minimum level of education and experience, and require that applicants take and pass an exam.

Q29. What constitutes enhanced environmental health and chemical safety related training?

Training may include worker health and safety, promoting chemical (substance, mixture or article) awareness, including an overview of the content of material safety datasheets (MSDS), information on exposure guideline limits (Occupational Exposure Limits and Recommended Exposure Limits), information contained within the NIOSH pocket guide to chemical hazards, and the OSHA/EPA Occupational Chemical Database.

Training that promotes safe work practices to reduce exposures to chemicals, including promotion of safer chemical products, engineering controls such as well-designed ventilation to promote air exchange, use of correct personal protective equipment including respiratory protection, gloves, goggles, or coveralls, isolation of work areas, safe storage and handling of chemicals, promoting sanitation and hygiene, and prevention of spills and proper waste disposal. These general worker protection methods have been well-established and are important to consider in any work environment (homes, schools, commercial buildings, clean-up sites, or traditional industrial facilities where chemical exposures are possible).

Training in an overview of any existing chemical specific worker training and certification program may include, but is not limited to: lead abatement, lead renovation, repair, and painting (RRP), asbestos abatement, PCBs, diisocyanates (auto-refinishing and spray polyurethane foam), pesticide worker protection standards, PFCs, PBDEs/HBCD, and others.

Q30. What is the average number of individuals trained during a training cycle?

In past EWDJT reporting, an average of 20-24 individuals are trained during each cycle. This number may fluctuate depending on where the training program is located, i.e. an urban area versus a rural community. Grantees may also have varying levels of enrollment based on the intensity and comprehensiveness of the curriculum, the number of certifications to be earned, and the varying costs of delivering training. EPA encourages applicants to train and place as many people as possible.

Q31. What is the average number of training cycles delivered under a grant?

Grantees typically offer 2-3 training cycles per year. This number can fluctuate depending on the curriculum being offered, as it correlates to available employment, and the schedule for when a grantee 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.

Q32. Does EPA require grantees/applicants to have a set training curriculum?

No, the only required training is OSHA 29 CFR 1910.120 40-hour HAZWOPER, as stated above.

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 environmental and cleanup 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).

Q33. What are some things to consider when designing a curriculum?

The goal of the Environmental Workforce Development and Job Training Program is to help its participants develop the skills and earn the certifications needed to secure full-time careers in the environmental and remediation fields.

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 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 can increase your application's chances of success.

Q34. Where can I find information about certified instructors who can deliver the needed training we are proposing?

While EPA does not endorse specific instructors, several EPA programs do provide databases of certified instructors who can deliver different types training:

1. EPA's Lead Program provides a database of certified instructors who can deliver the new lead renovation, repair, and painting (RRP) training. This list can be found at: www.epa.gov/lead/renovation-repair-and-painting-program
2. For wastewater training, EPA encourages you to contact your state wastewater operator certification coordinator who may be able to assist you in locating instructors that are familiar with your state's operator certification requirements. State operator certification program contact information can be found at the Association of Boards of Certification's website: www.abccert.org/certification_contacts/default.asp

Q35. How much of the grant should go towards funding the direct training versus non-training programmatic expenses?

There is currently no requirement for how much of the grant should be committed directly towards training 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 others activities), EPA prefers that the bulk of grant funds go toward training costs (i.e., personnel costs to instructors and other direct costs of training).

The exact budget allocation for each program is expected to vary to some degree depending on a variety of factors. For example, some programs may be able to commit more funds directly towards 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 application. Applicants are still encouraged to seek non-EPA supplemental funding and leverage additional funds to support non-environmental training costs whenever possible.

Q36. Can a grant recipient conduct a training cycle in another language, e.g. Spanish?

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, and that some certifications or licenses require that holder has a valid legal ID or green card. Thus, the applicant should verify state, local, 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 support letters, must be submitted in English.

Q37. Can a grantee provide training to individuals who are not currently legal residents of the United States?

No. Costs for training individuals who are not citizens of the United States, the territories, U.S. possessions or lawfully admitted to the U.S. for permanent residency are unallowable per [40 CFR 45.135\(a\)](#).

Q38. Can a grantee provide training to individuals under the age of 18?

Individuals graduating from an EPA funded Environmental Workforce Development and Job Training program must be 18 years or older. Individuals must be 18 years old at the time of graduation in order to be placed into a brownfields-related job as the Fair Labor Standards Act prohibits youth under the age of 18 from being employed in hazardous occupations.

VI. Community and Employer Partnerships

Q39. Am I required to inform the target community of my intention to apply for an Environmental Workforce Development and Job Training grant before or during the preparation of my application?

Applicants are not required to inform their target community; however, they are **strongly** encouraged 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.

Q40. How can I get the target community involved in my proposed training?

To engage your target community in the proposed training program, try to participate in events or activities already scheduled in your target community (e.g. town hall meetings, neighborhood advisory council meetings, church functions, etc.). Be prepared to make an announcement or distribute flyers with information about your proposed training program. Another good idea would be to have a draft of your application available at the city's webpage or public library and encourage the community to provide comments.

Q41. What type of roles might community-based organizations play in my proposed training?

Community-based organizations can help you provide the non-environmental training (not covered under this grant) that may be required to help participants retain employment. 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; and
- In-kind contributions: staff time, supplies, transportation, daycare services, equipment required for training, or providing a facility to host events or training.

Q42. 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

Applicants are encouraged to discuss their efforts to engage the employer community in their responses to the appropriate ranking criteria.

Q43. Where can I find information on other environmental job training programs and receive assistance in developing my own?

For more information on environmental job training programs, please visit the Hazardous Materials and Research Training Institute's (HMTRI) website at: hmtri.org. HMTRI, through a cooperative agreement with the US EPA, provides technical assistance to existing grantees and prospective environmental workforce development and job training applicants through their Professional Learning Community (PLC). For more information, please visit brownfields-toolbox.org.

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 grantees can also provide technical assistance to existing and prospective applicants interested in submitting an application for an environmental workforce development and job training grant. For a listing of these organizations and contact information, visit: www.epa.gov/brownfields/brownfields-technical-assistance

VII. Administrative Costs

Q44. Are there limits on administrative costs for EWJDT 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. Because the vast majority of EWJDT funding will be for Brownfields related training, EPA will apply the 5% limit on administrative costs to all EWJDT grants.

Q44. My organization's federally negotiated rate that is greater than 5%. Can we charge more than 5% for indirect costs?

We understand that many entities have negotiated indirect rates. However, the statutory authority for the Brownfields grants caps the amount of grant funds that can be spent on administrative costs to 5%. The 5% cap of administrative costs is for all administrative costs, including indirect rates and other administrative expenses. For example, if an entity wants to charge their indirect rate to the grant, and their negotiated indirect 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.

Q46. 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)(B) 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.

Q47. Does the limit on administrative costs for Brownfield Grants conflict with the requirement in 2 CFR § 200.414(c) for EPA to accept recipients' negotiated indirect cost rate?

No. The regulation states that "[A] Federal awarding agency may use a rate different from the negotiated rate for a class of Federal awards or a single Federal award only when required by Federal statute . . . ". By statute, administrative costs for Brownfield Grants are limited to 5% of the amount of EPA funds made available under a Brownfields Grant.

Q48. What is the difference between an administrative cost and a programmatic cost?

Administrative Costs. Administrative costs are direct costs, including those 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 Part 200 and 2 CFR Part 200, Subpart E. Direct costs for grant administration are ineligible even if the recipient or subrecipient is required to carry out the activity under the grant agreement. **Administrative costs include indirect costs the recipient incurs under the OMB Cost Principles found at 2 CFR Part 200.**

Programmatic Costs. EPA has determined that costs for activities that are integral to achieving the purpose of the cooperative agreement are considered as "programmatic" costs; not administrative costs. Direct costs are defined in the applicable OMB Cost Principle 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.

Q49. How much of the grant funds can be used for administrative costs?

CERCLA, as amended by the 2018 BUILD Act, allows recipients to charge up to 5% of the total award grant funds for the payment of administrative costs. There is no similar cap on the amount that may be charged for the payment of programmatic costs.

Q50. 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 § 200.343 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.)

Q51. What are examples of allowable programmatic costs that are not subject to the 5% administrative cap?

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

Q52. If I name a consulting firm as a “partner” in the application is it proper to award that firm a sole source contract on that basis?

No. All contracts for professional services in excess of the \$10,000 micro-purchase threshold must be awarded competitively to the maximum extent practicable and in compliance with requirements to consider disadvantaged business enterprises set forth in [40 CFR Part 33](#). The market for consulting services is robust and it is unlikely that competition is impractical. Note that as required by 2 CFR § 200.320(a) 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 requirements in [40 CFR Part 33](#) for 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](#).