

## **Frequently Asked Questions**

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FAQs will be updated on a regular basis. As new questions are added, they will be highlighted in blue.

#### **Definitions**

#### What is Environmental Justice?

Environmental justice, as defined by the EPA, is the just treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other Federal activities that affect human health and the environment so that people:

- are fully protected from disproportionate and adverse human health and environmental effects (including risks) and hazards, including those related to climate change, the cumulative impacts of environmental and other burdens, and the legacy of racism or other structural or systemic barriers; and
- have equitable access to a healthy, sustainable, and resilient environment in which to live, play, work, learn, grow, worship, and engage in cultural and subsistence practices.

#### What is the definition of a "disadvantaged community"?

This program uses the EPA's definition of underserved and disadvantaged communities but you may also see the term "community of focus." All of these terms refer to the communities this program seeks to serve.

experiences disproportionate environmental and climatic harms and risks. This disproportionality can be a result of greater vulnerability to environmental hazards, lack of opportunity for public participation or other factors. Increased vulnerability may be attributable to an accumulation of negative or lack of positive environmental, health, economic or social conditions within these populations or places. The term describes situations where multiple factors, including both environmental and socioeconomic stressors, may act cumulatively to affect health and the environment and contribute to persistent environmental health disparities.

NOTE: This term has a distinct meaning when identifying geographically defined disadvantaged communities for any programs funded through the Inflation Reduction Act.

Project activities funded by this program must benefit a disadvantaged community. Applicants will have to use <u>EJScreen</u>, a mapping tool developed by the EPA, to show that the project benefits a designated disadvantaged community, as defined in the Inflation Reduction Act.

#### What is the definition of a severely capacity-constrained organization?

Severely capacity-constrained organizations have the option to apply through a separate process for a non-competitive Tier I subgrant. Severely capacity-constrained organizations may not have the capacity to go through a competitive subgrants process and may struggle to adequately meet and fulfill the many requirements that federal funding entails. The MAP EJ Grants Hub has created an Assessment of Capacity Constraint to serve as guidance for identifying severely capacity-constrained organizations, recognizing that there is not one set of rigid criteria that will encompass the circumstances of all capacity-constrained organizations.

Examples of severely capacity-constrained organizations:

- Newly formed non-profits
- Organizations building capacity to address emerging environmental justice issues in their community
- Organizations that are volunteer-run or who have a small staff (less than 5 people)
- Organizations that are restructuring or have recently had a significant turnover of leadership, staff, or board

Click <u>here</u> to preview the Assessment of Capacity Constraint that applicants must complete as part of the non-competitive process.

#### What is a Thriving Communities Technical Assistance Center?

There are 16 Environmental Justice Thriving Communities Technical Assistance Centers (EJ TCTAC) across the United States to assist underserved and overburdened communities. Through training, technical assistance, community assessments, collaboration, and education, the EJ TCTACs will help communities

build their capacity to access funding and resources to help achieve environmental and energy goals.

The Mountains and Plains Thriving Communities Collaborative (MaPTCC) is the EJ TCTAC serving EPA Region 8. Led by Montana State University and partnering with local nonprofits and institutions for higher education, MaPTCC helps organizations start, fund, and carry out locally-driven environmental justice projects.

#### Learn more about the Region 8 EJ TCTAC.

#### What are environmental justice projects?

Environmental justice projects address local environmental and public health issues. Some examples include:

- Air quality and asthma
- Fence line air quality monitoring
- Monitoring of effluent discharges from industrial facilities
- Water quality and sampling
- Small cleanup projects
- Improving food access to reduce vehicle miles traveled
- Stormwater issues and green infrastructure
- Lead and asbestos contamination
- Pesticides and other toxic substances

- Healthy homes that are energy/ water use efficient and not subject to indoor air pollution
- Illegal dumping activities, such as education outreach and small-scale clean ups
- Emergency preparedness and disaster resiliency
- Environmental job training for occupations that reduce greenhouse gasses and other air pollutants
- Environmental justice training for youth

#### Eligibility

### Eligible entities

#### Am I eligible?

To confirm your eligibility, you can review the <u>pre-screening questionnaire here.</u>

What counts as local government?

2 CFR 200.1 Local government means any unit of government within a state, including 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
- Any other agency or instrumentality of a multi-, regional, or intra-State or local government

# Can an otherwise eligible "fiscal agent" or "fiscal sponsor" apply "on behalf of" an unincorporated group?

- Fiscally sponsored entities may be allowed to apply.
  - o If the entity is not incorporated or does not otherwise have a legal status, then the organization's fiscal sponsor must apply as the primary applicant, with the sponsored entity as a contractor or partner. The fiscal sponsor will be evaluated on the strength of their connection to the target community, as well as on its ability to carry out the project directly.
  - If the entity is incorporated and has a legal status, then it can apply as the primary applicant.

- Sponsored entities should agree on their approach with their fiscal sponsor prior to applying.
- Note that sponsorship fees cannot be included as a budget line item.

# Can an otherwise eligible "fiscal agent" or "fiscal sponsor" apply on behalf of an otherwise eligible entity, such as an incorporated nonprofit organization, that may lack the capacity to apply and/or manage a full EPA grant on their own?

- If a fiscal sponsor or fiscal agent chooses to apply, they must be the lead applicant, and they will be evaluated on their ability to implement the proposed project. The sponsored organization may be named as a subrecipient in the proposal.
- Please note that this program is intended to provide resources to capacity constrained organizations, so an organization that may have lacked capacity to compete for or manage federal funds under other grant programs may still consider applying under this program.
- EPA Subaward Policy Frequent Questions [Updated November 2023]

## What community organizations are eligible for subgrants from the MAP EJ Grants Hub?

Nonprofit organizations, including community-based and grassroots nonprofit organizations and philanthropic and civic organizations with a 501(c)(3) or 501(c)(6) nonprofit status.

## Are 501(c)(6) organizations eligible for these subgrants?

Yes, entities having 501(c)(6) tax exempts status as a trade organization are eligible.

## Eligible locations

### Where do you give subgrants?

The MAP EJ Grants Hub serves communities in EPA Region 8. This includes Colorado, Utah, Wyoming, Montana, South Dakota, North Dakota, and <u>28 Federally recognized tribes</u>. We support rural, remote, suburban, and urban areas that experience disproportionate negative environmental and/or climate change burdens.

#### **Eligible Activities**

#### Can the TCGM funding be used to hire a consultant to write more grants?

All expenses included in the proposed budget must be related to proposed project activities. Applicants that do not have a current Federal negotiated indirect cost rate may elect to charge a de minimis rate of up to 15 percent of modified total direct costs (MTDC). These funds are used at the organization's discretion and documentation is not required to justify its use. For example, an organization proposing a \$200,000 project can include \$30,000 in indirect expenses at the 15% "de minimis" rate in their budget without additional explanation as to how those funds will be used. Please note, unallowable costs including but not limited to advertising, alcoholic beverages, entertainment costs, lobbying, etc. are still not permitted even if allocated to the "de minimis" line item and are subject to being audited, similar to all other funding through this program.

#### Is there a cap on purchasing certain items with this subgrant money?

There is a cap in this subgrant program for land acquisition or purchases, which can only comprise up to 50% of subgrant funds (e.g. for a tier III project with a total budget of \$350,000, a maximum of \$175,000 can be used for land acquisition or purchase). Additionally, individual budget items including salaries must be cost reasonable.

The remainder of the subgrant funds would be used for other proposed project activities. Examples of those project activities include: developing a plan with the community about how they want to develop the land; public education about the clean up process; starting the permitting process for building on the acquired land; or a replanting project to restore native plants.

#### Can a non-profit organization partner with a for-profit organization?

Yes. As long as the lead applicant is an eligible entity, they are allowed to collaborate with other types of organizations. Depending on the role that the for-profit organization would play or the services that they would provide, the agreement between the nonprofit and for-profit entity would be subject to all EPA regulations on subrecipient agreements and procurement contracts.

### **Ineligible Activities**

#### What are ineligible activities?

Certain activities cannot be funded with TCGM funds, including lobbying, legal expenses, advertising, alcoholic beverages, entertainment costs and any other activities that are unallowable under <u>2 CFR Part 200, Subpart E</u>. For more questions about allowable costs, contact mapejgrants@jsi.com or refer to <u>Developing a Budget Webinar I US EPA.</u>

#### What is the difference between advocacy and lobbying?

Advocacy is an allowable activity using TCGM funds, whereas lobbying is not allowable. Advocacy is a general term for activities that aim to change public opinion or support a cause. Advocacy can include raising awareness, offering support, and organizing communities. Lobbying is generally defined as any attempt to influence a politician or public official on a specific piece of legislation or regulation.

#### Examples of advocacy:

- Educating community and/or elected officials about topic
- Telling a government official how a policy affects constituents
- Using social media to get the word out about a cause/issue
- Meeting with a government official to explain how a particular problem/issue is affecting a particular group or organization, the environment, etc.

#### Examples of lobbying:

- Contacting members of a legislative body (local, state, federal, even international) for the purpose of proposing, supporting, or opposing legislation
- Urging the public to contact members of a legislative body for the purpose of proposing, supporting, or opposing legislation
- Advocating for the adoption or rejection of legislation
- Communicating with the general public and reflects a view on a ballot initiative

#### All About the Subgrants

### How do I know which tier to apply to?

Tiers differ by activity, duration, and budget. It is important to note that they are not linear, and the applicant can choose between any of the tiers. Here is the breakdown of the competitive tiers:

	Purpose	Project Period	Budget	Examples
Tier 1	Assessment	1 year	Up to \$150,000	Research, sampling, testing, monitoring, public education
Tier 2	Planning	1-2 years	Up to \$250,000	Partnership-buildi ng, public outreach and education, coordination with community stakeholders, training
Tier 3	Development	2 years	Up to \$350,000	Smaller land purchases, blueprints for construction, implementation of project plans

#### Can applicants apply for multiple cycles and tiers?

Yes. For example, if an organization received funding for a Tier 1 assessment subgrant, they can apply for a Tier 2 planning subgrant in subsequent cycles. There is a \$600,000 lifetime cap on the funding that one single entity can receive through this subgrant program.

#### Can an applicant submit more than one application?

Yes. An applicant can apply for up to two awards per cycle, and they can be for the same or different tiers.

# Can applicants submit an application for both a competitive and non-competitive subgrant?

Yes, an organization can apply for both a competitive and a non-competitive subgrant. If the evaluators find that the applicant is not severely capacity constrained, however, they will be ineligible for the non-competitive subgrant.

# Can I receive two subgrants from the same tier? For example, my organization currently has a Tier I assessment subgrant. Can we apply for another Tier I subgrant in a future cycle?

Yes, an organization can hold up to 2 awards at the same time, as long as the total amount granted does not exceed the \$600,000 total funding cap for this program.

### Can a non-competitive subgrant fold into a competitive subgrant?

Upon a successful project closeout for non-competitive award, subgrantees are welcome to submit a competitive application in subsequent cycles. The competitive subgrant would be a new and separate award from the non-competitive award.

#### Will applying early increase the chances of being selected for an award?

No. All competitive applications will be evaluated after each application cycle closes. Applications are not reviewed on a rolling basis.

### How does the non-competitive award differ from the competitive award?

- I. Eligibility: There are additional eligibility requirements to be considered for a non-competitive award.
- II. Tier: Non-competitive awards are only for Tier 1 assessment projects.
- III. Application: The competitive subgrant application requires more time to complete as it has multiple questions and a required budget template to complete. The non-competitive subgrant application includes an organizational capacity assessment and a concept note that describes the project idea.

IV. Milestones: Only non-competitive subgrantees will be funded based on the milestones that they complete. Once notified of an award, the subgrantee will establish a milestone schedule with their assigned grant manager. Recipients of the competitive awards will create a detailed project work plan with specific deliverables, and most will be paid on a cost reimbursement system.

# What happens if the eligibility reviewer does not agree with the tier that my organization applied for?

Upon eligibility review, if the proposed project activities do not align with the Tier selected by the applicant, the application may be deemed ineligible and returned to the applicant. At that time, applicants would have the opportunity to change the Tier that they are applying for, , including any necessary budget or timeline changes. The application can then be resubmitted during the same cycle, if it is still open, or re-submitted during a future cycle.

#### Is there a minimum award amount?

No. There is not a minimum award amount per grant cycle.

#### Do we need to have a partner?

No, partnerships are not a requirement of this grant program. An applicant is allowed to collaborate and submit a joint application, as long as there is one lead applicant who will hold the responsibility of managing funds, meeting the reporting requirements, etc., and all other partners would be subrecipients. If you will be working with partners, it is important to describe all of the roles in the application and work plan.

# Public education is listed under each tier of subgrants. Is there a difference between the types of public education projects that would qualify under each tier and, if so, would you be able to provide any examples?

The main difference between public education across tiers is the budget and other project activities, e.g. whether public education is part of the planning process for future work (Tier 2), or a component of implementing a fully formed project (Tier 3).

#### **Grant Application**

#### What can I do now to get ready to apply for funding?

Make sure your organization has an up-to-date Unique Entity Identifier (UEI) and an active registration with <u>sam.gov</u>. This is required in order for organizations to receive federal funds. If you have any questions regarding UEI registration, please contact <u>R8tctac@montana.edu</u>.

To start a new registration or to renew, visit: <u>sam.gov.</u> This website also has resources to help with registration.

#### What does the application process look like? How should I prepare?

The application is designed to be as succinct as possible and the hope is that an applicant would not need a professional grant writer.

- Start to think about how the project you plan to propose will address an environmental justice issue in your community or the community where you work
- Consider the project activities that you would like to have funded, and what expenses you would include in your budget.
- Review the 3 Tiers to determine where your project might fall.
- If you are a fiscally sponsored organization, have a conversation with your fiscal sponsor about who will serve as the lead on the application and any preparation necessary for receiving federal funds.

#### Are there any application templates?

Only the budget template is required for application.

# The application notes that if we are awarded, we will work with our grant manager on an evaluation plan. Is there anything we should consider about evaluation before then?

In addition to answering the application question about tracking project activities, milestones, and project benefits, you should consider any budget implications for evaluation activities (staff salaries and time spent on evaluation activities; costs of data collection methods – for example, survey software; incentives for people to take

part in focus groups or interviews; compensating for people's time; the cost of any outputs (reports, videos, presentations, infographics), etc.

#### Can you share a template of what we will need to write for the application?

As soon as the application is released, a PDF version of the application and a high-level scoring rubric will be shared on the project's website so that your organization can get an idea of the questions and evaluation criteria. Here are some important things to consider when thinking about your project proposal:

- What environmental justice issue does your project address?
- What community of focus does your project benefit? If you're unsure, check out the EJScreen to see if the target community fits the EPA IRA Disadvantaged Community criteria.
- What tier of funding would best fit your project idea?

For more help thinking through your project ideas, the <u>Mountains and Plains Thriving</u> Communities Collaborative can assist.

#### Can I save my application and come back to it?

Yes. Once you make progress on the application, there is an option in the upper right hand corner of the screen that says, "save and continue later." You can enter your email and Alchemer, the application platform, will send you a link so that you can pick back up where you left off.

#### What documents do I need to upload to the application?

You will need to upload a copy of your sam.gov UEI verification (if available) and, if applicable, documentation that your organization is a 501(c)(3). All applicants are also required to upload the budget template form and itemized budget sheet. To upload, click the "browse" button which will open up a new window where you can upload any forms you have on your computer. The accepted file types are png, gif, jpg, jpeg, doc, xls, docx, xlsx, pdf, txt, mov, mp3, and mp4.

#### Should I type the long form answers directly into the application?

Yes. You can either type directly into the textbox or you can copy and paste from another word processing program into the textbox. You can expand the textbox by dragging the two small lines in the bottom right hand corner. The word limit is shown at the bottom of the textbox, as well as the word count of your response.

#### How do I know how far I am in the application?

There is a gray progress bar above the title of each page of the application that shows how far you are in the application.

#### How will I know if my application has been successfully submitted?

After you submit your application, you will receive an automatic email confirmation a few minutes after completion that your application has been submitted. If you do not see the confirmation in your email inbox, check your spam folder.

#### What grant writing resources are available?

The application was designed to be as succinct as possible. The hope is that the applicant will not need a professional grant writer; anyone familiar with your organization and proposed project should be able to complete the application. For additional resources, visit EPN Federal Grants Development webinar.

While the <u>Mountains and Plains Thriving Communities Collaborative</u> cannot write the grant application on behalf of your organization, their team can help in brainstorming project ideas or developing a budget.

## Would you please clarify if what I should be screening is the address of the organization's location or the location of the project?

We will be screening for the area where the project will take place and/or where you expect the project to have impact. Applicants will need to upload a map of the project area using the <u>EPA EJ Screen</u> and include the zip code. Additionally, proposed projects must serve "communities of focus." For the sake of this project, "communities

of focus" are defined using the Inflation Reduction Act Disadvantaged Communities Map <u>here</u>.

Click here for instructions on how to use EJScreen.

Scoring and Evaluation

#### Who will review applications and determine who is selected for subgrants?

The MAP EJ Grants Hub will first screen through the applications to verify eligibility. Applicants will receive notice of eligibility within two weeks of application submission.

Once the application closes, each application will be reviewed by members of the scoring committee. The scoring committee is made up of representatives from the MAP EJ Council and staff from the MAP EJ Grants Hub team. The committee will score applications based on a scoring rubric. The MAP EJ Grants team will consider application scores along with geographic distribution when making funding decisions.

To better understand how the applications will be scored, <u>here</u> is an overview of scoring rubric.

#### What happens if I am not selected?

If your organization is not selected, you can set up a meeting with the MAP EJ Grants Hub team to receive feedback on your application or be referred to the <u>Mountains</u> and <u>Plains Thriving Communities Collaborative</u> (MaPTCC), the EPA Region 8 TCTAC, for additional technical assistance.

Reporting, Finance, and Compliance

#### What is the Pre-Award Assessment?

Finalist applications will be required to complete a pre-award assessment (PAA) to determine the organization's readiness to receive federal funds and comply with federal funding requirements. The assessment will ask about internal policies, financial systems, etc. The results of the assessment will inform the terms of your final subgrant agreement.

## What reporting requirements for these federal funds does the MAP EJ Grants Hub take on and what is passed to the subgrantees?

The MAP EJ Grants Hub is responsible for reporting to the EPA. Subgrantees will be responsible for reporting to the MAP EJ Grants Hub.

#### What are the reporting requirements?

All competitive subgrantees will be required to complete a quarterly report using a standardized template. The reports are divided into the following categories:

- Project Overview: objectives, accomplishments, technical assistance needs
- Activities, Dates, Locations, and Partners: status of activities, compared to those outlined in workplan
- Outputs: products, services, or events produced by the activities
- Outcomes: results of the activities
- Financial Reporting: expenditures of the reporting period

In addition to quarterly reporting, there will also be a closeout report. This will include a high-level summary of project activities, outputs, outcomes, budget utilization, and project reflections.

Please note that these are the reporting requirements for the competitive awards. Recipients of the non-competitive awards will have different reporting requirements.

#### How will funds be awarded and distributed to subgrantees?

Recipients of the competitive subgrants receive payments on a reimbursement payment structure. This means subgrant recipients must draw funds for the amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients or to satisfy other obligations for allowable costs under the subgrant agreement.

#### **Grants Management**

#### What happens after an applicant is notified that they are a finalist for an award?

After being notified, finalists will complete a pre-award assessment to ensure that they have the capacity to manage grant funds and to determine if any special subgrant conditions are needed. The MAP EJ Grants Hub may also request modifications to the project budget or scope of work to ensure compliance with federal requirements.

During the pre-award assessment, subgrantees must indicate whether their project includes environmental information activities that require a Quality Assurance Project Plan (QAPP) or research that requires the approval as Human Subjects Research. If so, then additional steps will be required.

Finalists will then execute subgrant agreements and will be assigned a grant manager for the next steps. We anticipate that subgrant agreements will be executed approximately 3-4 months after the application closes.

#### What kind of support will be provided to subgrantees?

Subgrantees will be assigned a grant manager. The grant manager will monitor progress, provide technical assistance, and ensure compliance. The role of grant managers is to support subgrantees' success in executing their grant and increasing capacity to manage future federal funds.

#### When does the project period to complete the subgrant begin?

The project period will begin upon the execution of subgrant agreements.

# Does grant money have to be fully spent and all goals achieved within that project period?

Yes. Subgrantees will report on progress quarterly, and if any adjustments are needed to the project budget or the project work plan, subgrantees should work with their grant manager as soon as possible.

#### What can I expect in terms of the requirements of the subgrant agreement?

As the TCGM is funded by the EPA, subgrantees should expect to follow the EPA General Terms and Conditions. The EPA General Terms and Conditions are a set of administrative and programmatic requirements that recipients must comply with to receive EPA funding.

#### Training and Resources

# Are there information sessions with the team to learn more about the grant application process?

Yes. The MAP EJ Grants Hub will host an applicant webinar to walk through the program and application process. Subgrantees can also expect orientations and training on topics such as grants management, reporting requirements, quality assurance, and human subjects research.

#### Do we have training and resources to help subgrantees manage funds effectively?

Yes. The grants manager will support with managing funds and can provide assistance as needed.

#### Is there translation support?

Yes. Application materials will be provided in Spanish. For additional support, contact mapeigrants@jsi.com.

#### How can I get support in submitting an application?

On the resources page, you can find more information on eligibility, detailed application instructions, and EJ Screen guidance. For general questions and information, the MAP EJ Grants Hub holds a bi-weekly open office hours. To receive an invitation for this, please reach out to <a href="majegrants@jsi.com">majegrants@jsi.com</a>.

For specific questions regarding your application, you can reach out to the Region 8 EJ TCTAC: The Mountains and Plains Thriving Communities Collaborative.

#### Program Oversight

#### Do you work for the EPA?

We do not work for the EPA. Our team consists of a team of staff at JSI Research & Training Institute, Inc.. With a network of partner organizations, we work together to fulfill our common purpose and assist communities most in need by helping them find environmental and energy equity resources. The MAP EJ Grants Hub is funded by the U.S. Environmental Protection Agency under a cooperative agreement.

#### How involved is the MAP EJ Grants Hub in my project?

Once notified of the award, your organization will be assigned a grant manager who is a staff member of the MAP EJ Grants Hub. The grants manager will be your point of contact and will be available to support grants administration and capacity development. They will also support in monitoring performance such as tracking progress on the project work plan (including achievement of milestones if this is a non-competitive award), use of funds in accordance with the proposed budget, and completion of quarterly reports.

#### What is the role of JSI in this project?

JSI Research & Training Institute, Inc. (JSI) is a global nonprofit dedicated to improving lives around the world through greater health, education, and socioeconomic equity for individuals and communities. All staff on the MAP EJ Grants Hub team are employed by JSI.

Tribal and Native Specific Questions

#### Can Tribal language and culture preservation be a part of this subgrant?

Possibly. The applicant would need to clearly demonstrate how the proposed project addresses an environmental justice or climate change issue.

Examples:

 A project that integrates traditional ecological knowledge and cultural practices as part of a watershed restoration project  A program aimed at expanding traditional agricultural practices that includes a Tribal language component like teaching the plant names in the Tribal language.

## Can the project center on Indigenous food access, sovereignty, and education?

Food access, addressing food deserts, etc. falls under an environmental justice issue, and it is listed by EPA as one of their example issues. Food sovereignty may be eligible if it is framed as an environmental justice issue.