

# Preparing to Receive Federal Funding from the Environmental Protection Agency (EPA) through the MAP EJ Grants Hub

Note: This document is for informational purposes only, and no action is required. Applicants who are finalists for funding will receive separate notification of next steps.

Thank you for submitting an application to the MAP EJ Grants Hub, the Region 8 Grantmaker for the Thriving Communities Grantmaking Program. Your application has been screened to determine whether it meets the eligibility criteria for the program, and it has been found eligible. It will now move forward to the evaluation phase. **No funding decisions have been made, and you do not need to take any action at this time.** We anticipate notifying applicants of funding decisions in early February 2025.

Because many of our applicants are new to federal funding through the EPA, we wanted to share some resources on EPA funding and the MAP EJ Grants Hub grantmaking process. If your project is chosen to receive a subgrant, you may be required to abide by some or all of these policies. This information is intended to be informational; if you are selected to receive an award, you will receive formal notification of requirements and conditions. Your grant manager will also work with you to support your compliance.

## **Pre-Award Assessment Requirements**

If your project is selected as a finalist for funding, you will be asked to complete a Pre-Award Assessment (PAA). The PAA is intended to assess your readiness to receive federal funds, and to determine if any specific conditions are necessary as part of your subgrant. If you are a fiscally sponsored entity, the PAA will consider your capacity and the capacity of your fiscal sponsor.

A preview of the PAA form is available <a href="here">here</a>. You do not need to complete these forms now; this is just a preview. If you are selected as a finalist, you will receive a formal request to complete the PAA process, and will have two weeks to complete and return these forms. If you have any questions about the PAA, please reach out to <a href="majerints@jsi.com">majerints@jsi.com</a>.

# Award Terms, Conditions, and Requirements

If you are selected to receive a grant award, you may need to comply with the EPA terms, conditions, and requirements below.

#### **Quality Assurance Project Plans (QAPP)**

Projects that involve the collection of "environmental information"--which includes a range of activities including formal research projects, conducting surveys or collecting information from community members, and doing any activities that involve measurement or analysis—require an EPA-approved Quality Assurance Project Plan (QAPP). We encourage you to use these <u>Quality Assurance Screening Questions</u> to assess whether your project may require a QAPP, if it is selected for funding. The need for a QAPP will be confirmed during the pre-award assessment process.

#### **Human Subjects Research (HSR) Requirements**

Projects that involve systematic research with human subjects are also subject to specific EPA requirements. Your HSR plan must be reviewed and approved by an Institutional Review Board (IRB) and also by the EPA. We encourage you to use these <a href="HSR screening questions">HSR screening questions</a> to assess whether your project may require review and approval, if it is selected for funding. The need for an HSR plan will be confirmed during the pre-award assessment process.

#### Requirements Related to Construction, Repair, or Renovation Activities

Projects that involve construction, repair, and renovation activities have specific requirements related to fair labor standards and the use of manufactured materials.

- If you are planning a construction, repair, or renovation project with a cost of \$2000 or more (even something as simple as painting), then you must comply with Davis-Bacon and Related Acts (DBRA). More information is available in the <u>DBRA Requirements for</u> EPA Subrecipients and EPA Davis-Bacon Grant Term and Condition Webinar.
- If you are planning a construction project that involves the use of iron, steel, manufactured products, and construction materials, you may need to comply with the Build America, Buy America Act for the procurement of materials. More information is available <u>Build America</u>, <u>Buy America Act (BABA) Implementation Procedures for EPA</u> Office of Environmental Justice and External Civil Rights.

## Requirements Related to Subawards and Procurement Contracts

If you are planning to enter into any subawards or contracts with other organizations or individuals as part of your project, you must comply with the EPA's policies on subawards. This includes both subrecipient agreements and procurement contracts. According to EPA policy:

- Subawards are relationships with other organizations who carry out a portion of the
  project's scope of work. The subrecipient can only be reimbursed for approved direct
  and indirect costs, and they cannot make any profit. Subawards do not need to be
  competitively bid.
- Contracts are agreements with individuals, non-profit, or for-profit entities for goods or services that are available on the competitive commercial market. In general, contracts require a competitive bid process, with some exceptions for contracts under \$10,000.
   EPA also has caps on the daily rates paid to individual consultants.

It is important to note that even if a contractor was named in your proposal, you may still be required to put services out to competitive bid per EPA policy. More information is available in the EPA Subaward Policy, the EPA Procurement, Subawards, and Participant Support Costs Webinar, and Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements

## Terms, Conditions, and Requirements for all EPA Funding Recipients

- All federal funding recipients must have a Unique Entity Identifier (UEI) and an active registration with sam.gov. It is recommended to initiate this process prior to a funding decision. If you have any questions regarding UEI registration, please contact R8tctac@montana.edu for assistance. To start a new registration or to renew, visit sam.gov. This website also has resources to help with registration.
- EPA's Office of External Civil Rights Compliance has provided <u>Civil Rights Guidance on Procedural Safeguards: Requirements and Best Practices</u>, which summarizes civil rights policies that funding recipients must comply with, along with examples of best practices from the field.
- Every EPA award and subaward is subject to the EPA General Terms and Conditions.
- There are also several federal requirements that "flow down" to all EPA funding recipients. These include some requirements that apply to all federal funding, such as restrictions on lobbying activities, and some that are specific to certain types of projects, such as the Wild and Scenic Rivers Act. A summary of flow down requirements is available <a href="here">here</a>.

#### **Getting Started as a Subgrantee**

Organizations that receive funding awards will take part in several launch activities in the first quarter of the project period.

- All subgrantees will be invited to participate in a virtual **Subgrantee Orientation**.
- As part of the umbrella Quality Management Plan for the MAP EJ Grants Hub, grant
  managers will discuss each subgrantee's quality management policies and processes
  and will provide technical assistance if policies need to be developed or refined.

- Subgrantees will work with their grant manager to complete the following:
  - o A project Workplan
  - o A project Logic Model
  - o A project Performance Measurement Plan

Please note that these templates are examples to help with your planning; you are welcome to use a different format for your project.

• Subgrantees will receive training on completing **Quarterly Reporting Requirements**.

Grant managers will be available to support subgrantees with all of these requirements throughout the award period. Questions? Reach out to <a href="mailto:mapeigrants@jsi.com">mapeigrants@jsi.com</a> at any time!