

SNEP Pass-Through Entity (PTE) 2021 Request for Applications (RFA)

Frequently Asked Questions

(Updated 6-11-2021)

Submission Questions:

1. What time are applications due on June 13?

Applications are due by 11:59 P.M. (EST) on June 13, 2021 via grants.gov. Note that minor problems are not uncommon with transfers to Grants.gov. You should be careful to allow sufficient time to ensure that your application is submitted to Grants.gov BEFORE the due date identified in this solicitation.

2. Will webinar slides be shared either by email or on the SNEP website?

Slides will be posted on the SNEP website at <http://www.epa.gov/snep> under the "Funding" section shortly after the May 12 (1:00-2:00 PM EST) informational webinar. A recording of the webinar will also be posted; however, the timing of posting this recording may take a week or two.

3. Do subcontractors have to submit an individual SF424 or is that cost included as a line item on the applicant's SF424?

For instruction on how to treat use of contractors (line item on the 424), see <https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients>

4. If multiple parties are collaborating on the proposal, are partner letters required from collaborators?

Applications must include letters of commitment from any partners identified as necessary to achieving the goals of the proposal. Applicants will be evaluated based on the roles and contributions of partners and collaborators described in their project narrative.

5. Are there a maximum number of pages for the proposal narrative and the budget detail?

A proposal narrative and accompanying budget and budget detail are required materials. Section IV.C. of the RFA describes these submission requirements. Briefly, there is a 12-page limit for the proposal narrative. There is no page limit for the budget detail, but it should be consistent with the budget categories of the SF424 included in the application package, and concisely discuss how the budget aligns key tasks, costs, and estimated expenditures, and accounts for both federal and required non-federal cost share/match, including the role EPA funding will play in the overall project.

6. Are the budget SF424 pages included in the page limit?

No.

7. Are Commitment Letters optional?

Not if partners are identified as playing a substantial role in the proposal. Letters should describe commitment and/or involvement in the project, not necessarily financial only. See #4 above.

8. Are there requirements for biographical sketches and/or conflict of interest lists?

The RFA requires applicants to demonstrate qualifications related to their proposed projects by providing a list of key staff and briefly describing their expertise/qualifications and knowledge, as well as the roles of each partner and their involvement and how their resources will support the proposed project activities.

9. If an applicant applies for a grant, can some of its partners be co-awarded, so that the applicant does not have to administer funds? For another entity in another state?

No. EPA awards the grant to the eligible entity that successfully competes for funding. That entity is accountable to EPA for successful completion of the project and financial administration. EPA does not "co-award" a single grant to multiple entities. This RFA seeks a recipient to act as a pass-through entity for subawards to eligible project partners. Recipients for grants may hire contractors (note that consultants are contractors) to assist with financial administration provided the selection process complies with the Procurement Standards in 2 CFR Part 200. Also, recipients may enter into intergovernmental agreements under 2 CFR 200.318(e) with other units of government (e.g. a State) to use properly awarded contracts that are already in place to acquire shared services. Please refer to <https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients> .

10. What is the SAM.gov database?

SAM is a database where applicants and contractors are required to register. It is separate from DUNS. Applicants should do due diligence to ensure they are registered in advance of submittal.

11. Does the applicant have to have DUNS and SAM numbers for the submittal?

Applicants must have a DUNS and a SAM number in order to submit a proposal on Grants.gov. This is an RFA for a pass-through entity; subrecipients of successful applicants must obtain a DUNS number as provided in 2 CFR 200.331(a)(1). Contractors are not subrecipients and need not obtain a DUNS number on the basis of requirements in 2 CFR Part 200. See Section I.V.B of the RFA for further information on DUNS and SAM.

12. Where do you attach the cover page, budget description and commitment letters to the application package?

The order of the materials does not matter as long as all of the required materials and any additional attachments (e.g. partner letters) are uploaded to Grants.gov

13. Can ineligible applicants be an AOR (authorized organization representative) of the applicant?

No. Only eligible applicants can apply and the DUNS they are using to apply MUST be assigned to the organization that is actually applying. EPA does not recognize "fiscal agents" who submit applications on behalf of applicants.

14. What is the source to obtain input for specific line items on the SF424 document?

There is an SF424 instruction document that will help if you have questions about the form or its content. You can find that form here: <http://www.grants.gov/web/grants/form-instructions/sf-424-instructions.html>

15. What is the appropriate response for question 19 of the 424 form? Is the application subject to review by state under EO12372.

Executive Order 12372, Intergovernmental Review of Federal Programs, may be applicable to awards resulting from this announcement. EPA implemented the Executive Order in 40 CFR Part 29. EPA may require applicants selected for funding to provide a copy of their application to their State Point of Contact (SPOC) for review. The SPOC list can be found at www.whitehouse.gov/wp-content/uploads/2020/04/SPOC-4-13-20.pdf. EPA may require successful applicants from states that do not have a SPOC to provide a copy of their application for review to directly affected state, area-wide, regional and local government entities as provided at 40 CFR 29.7(b) and 40 CFR 29.8(a)(2). **These reviews are not required before submitting an application.** Only applicants that EPA selects for funding under this announcement are subject to the Intergovernmental Review requirement.

16. The budget form does not contain a line for subawards. Should these subawards be categorized as "other" in line h of this form or should a separate 424A be filled in for the subawardees budget?

Subawards will be under “other” on the 424A form, and then may be described further in the budget description that you provide with your proposal.

Eligibility Questions:

17. Can multiple departments/divisions in an organizational unit (state, local, and tribal governments; institutions of higher education; nonprofit institutions and organizations; and interstate agencies) apply?

Yes. However, this RFA limits awards under this announcement to one applicant. Multiple departments of an organization are welcome to apply, but EPA considers the organization itself to be a single non-Federal entity for award purposes. The organization will need to decide which department’s application represents their official application if an application competes successfully.

18. Are project partners subject to the same eligibility requirements as applicants, e.g. no companies or individuals?

No. Although in some cases, recipients may refer to their contractors (particularly consultants) as “partners, applicants should make sure to check <https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients> for more information on the difference between subrecipients (or partners) and contractors.

19. What are the SNEP boundaries of proposal project activities?

SNEP geographic boundaries include the area within Massachusetts and Rhode Island that includes the south-facing coastal watersheds in Rhode Island and Massachusetts between Westerly, Rhode Island and Chatham, Massachusetts, the watersheds of Narragansett Bay and Buzzards Bay National Estuary Programs (NEPs), and the off-shore islands of Martha’s Vineyard, Nantucket, Elizabeth Islands (Town of Gosnold, MA), and Block Island (Town of New Shoreham, RI). Projects must occur within this geographic area to be eligible for funding consideration. A high-resolution map of the SNEP geographic boundaries is found in Appendix A of the RFA and at <http://www2.epa.gov/snecwrp/background-information-southeast-new-england-coastal-watershed-restoration-program>.

Budget and Match Questions:

20. Can salaries be funded through the grant?

Yes. As long as the project expenses align with the project tasks, reasonable salaries are considered an eligible expense subject to the requirements of 2 CFR 200.430 and 200.431

21. Are there any rules regarding the indirect cost rates for partners?

We assume by "partner" you mean a subrecipient who will receive EPA funding under a subaward from a successful applicant. Indirect cost rates that are 1) federally approved; 2) approved by the recipient based on Federal standards in 2 CFR Part 200; or 3) the 10% de minimus indirect cost rate authorized by 2 CFR 200.414 are acceptable. See Appendix A for clarification. See Section VI.B. of the RFA for detailed information on indirect costs.

22. Is there a maximum allowable overhead rate that the SNEP grants will allow? If so, can the difference between your maximum allowable indirect rate and an organization’s negotiated indirect rate be used as match?

There is no maximum allowable indirect rate for the SNEP program that is less than the indirect rate an applicant has negotiated with its cognizant Federal agency. Note that applicants without a negotiated indirect cost rate use a 10% de minimus rate.

23. What is the period of eligible match? Will you allow pre-award match within a certain timeframe?

EPA grant regulations allow an applicant to incur pre-award costs, including match, up to 90 days prior to the award of funding provided that the costs are for expenses identified in an approved work plan. All costs incurred before EPA makes the award are at the recipient's risk. EPA is under no obligation to reimburse such costs if for any reason the recipient does not receive a Federal award or if the Federal award is less than anticipated and inadequate to cover such costs.

24. What percentage matching is required?

The minimum non-federal match is 25 percent of the federal request.

25. When does the match have to occur?

Match must occur prior to the end of the project and budget period.

26. Can volunteer effort be used as match, such as volunteer water quality monitoring?

Yes, time spent by volunteers may be used as cost share provided the requirements of 2 CFR 200.306(b) and (e) are met.

27. Can applicants include indirect costs as part of match?

Yes. Assuming the question refers to waived indirect costs as part of match, this practice is acceptable under 2 CFR 200.306. Unrecovered indirect costs, including indirect costs on cost sharing or matching, may be included as part of cost sharing or matching with the prior approval of the federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the federal award and the amount which could have been charged to the federal award under the non-federal entity's approved negotiated indirect cost rate.

Evaluation Criteria Questions:

28. What do you mean by "Link" to EPA's Strategic Plan?

Link asks applicants to identify how their proposal aligns with the goals outlined in EPA's strategic plan; links to the strategic plan can be found in Section 1.C of the RFA.

29. How will proposals be evaluated?

A team of experienced reviewers will evaluate proposals against criteria described in Section V.B of the RFA. Elements of the evaluation include program approach, organizational capability, past performance, cost-effectiveness and match, tracking and transferability of environmental and programmatic results, and timely expenditure of funds. We will not consider the qualifications, experience, and expertise of named subrecipients and/or named contractor(s) during the proposal/application evaluation process.

Partners and Contractors

30. What does EPA mean by "partner"?

The term "partner" refers to a mutually understood, documented relationship between an applicant and one or more third parties to collaboratively carry out a proposed project. A partner may contribute funds or in-kind resources to the joint effort and/or EPA funds may be used to finance the partner's activities. Any financial transactions between an applicant and a partner that involve EPA funds, however, must comply with the requirements in the UGG governing procurement contracts, subawards, or participant support costs depending on the nature of the relationship. Also, contributions of funds or in-kind resources that an applicant intends to use to meet a cost share on an EPA grant must comply with the UGG as well.

31. Can an organization be considered a partner even if not getting any funding from the grant?

Yes, as long as it is involvement in the project. Partners can also contribute funding.

32. If a consultant was selected competitively for an On-Call Contract and the grant was for a project that is a continuation of the existing project that the consultant was selected for, then could the grantee continue with that consultant without an additional competitive solicitation?

Yes, if an applicant has selected a contractor/consultant competitively, the scope of the contract includes the services to be delivered with grant funds, and the price is reasonable. The UGG prohibits noncompetitive contracts to consultants on retainers.

33. Is there an hourly rate on partners?

There is no hourly rate limit with the exception of contracts for individual consultants subject to the rate cap described at 2 CFR 1500.9. However, proposals will be scored based upon budget reasonability, as seen in the evaluation criteria found in Section V.B.

Other:

34. Can the non-profit be a 501(c) (6) or does it need to be a 501(c) (3)?

Organizations that are recognized as non-profit organizations under state law are eligible. Note, however, that non-profit 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 this funding.

35. If an applicant applies as lead organization, can that applicant also be included as a subcontractor on another grant?

Yes, an organization can serve as both a lead applicant for its own proposal as well as a subcontractor or sub-recipient in a different application. To understand the distinctions between contracts and subawards, see <https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients>.

36. Will applicants receive feedback from reviewers if their proposals are not selected?

Yes. Applicants may request feedback. EPA's Grant Competition Policies do not allow EPA to provide individual feedback to applicants during the proposal review and selection process.

37. Will there be opportunity to review specific projects with EPA prior to submission to determine eligibility (other than this webinar)?

EPA cannot discuss potential proposals with applicants.

38. Does a Quality Assurance Project Plan have to be submitted as part of proposal?

No, QAPPs or steps for their development are submitted as part of the work plan.

39. Would multiple applications from a university be compared against each other?

Proposals are not evaluated against each other. They are evaluated based on the evaluation criteria in Section V.B. See Question #17 above.

40. Are contracts with private vendors chosen using EPA's simplified acquisitions process (3 rate quotes and qualifications) listed under contracts?

Yes.

41. Are 501(c)3 nonprofit organizations required to comply with Procurement Standards 2 CFR Part 200 including specifically the requirement for Competitive Procurement for contractors?

EPA has determined that transactions between any recipient and a for-profit firm or individual consultant, in almost all cases, would be a procurement contract subject to competitive requirements. EPA considers a competition among three consulting to firms to be consistent with the regulatory standard. If the applicant describes the process it followed to select the consultant as its project partner EPA will evaluate the consultant's qualifications as part of the grant competition. See Appendix A for more information.

42. May a proposal include external evaluators as part of developing measures to track results and/or success?

Yes, proposals may include external evaluators as part of developing measures to track results and/or success.

43. Can multiple entities form a partnership to apply for this grant with one main applicant and other partners as sub-awardees?

Yes, this kind of partnership would be acceptable. Please see the "Contracts and Subawards" section of the RFA (Sec. VI) for details. Please note that non-competitive sub-awards can only be made to 501(c)3 organizations.

44. For the SF 424a do we list the budget by years or just the total amount for all 7 years?

For the SF 424a, the budget is for the total over the up to 7-year grant period.

45. For the support materials, it asks for "verification of proposed sources of non-federal match". If we plan to require sub-awardees to provide match, what kind of verification can be given for this method?

All sources of match should be described, including the process to secure match; e.g. match will be a requirement for sub-awardees, applicants will waive portion of their indirect costs, partners will provide match, etc.