

2 CFR Updates to the Appendix, NOFOs, and Competition Webinar
December 5, 2024
Frequently Asked Questions (FAQ)

- Q1: What is the role of the Notice of Funding Opportunity (NOFO) FAQs?
- A1: NOFO FAQs are used by EPA Program Offices to provide answers to frequently asked questions about the NOFO requirements.
- Q2: Will NOFOs contain a link to who can be contacted if there are questions during the open period of the NOFO?
- A2: Agency contact information is included in Section 1.E *Agency Contact Information*. It will be in the same section of every NOFO issued after October 1, 2024.
- Q3: If the NOFO references 2 CFR regulations, do you plan to summarize the regulatory language for better readability? I frequently work with 2 CFR regulations, and they can be quite complex and dense. Paraphrasing such legal language requires significant time and expertise, and there is also a risk of misinterpretation. What are your thoughts on this?
- A3: Summarizing legal requirements in plain language or linking directly to other documents summarizing the statutory (or regulatory) requirements is the framework for communicating legal requirements. The Office of Grants and Debarment consults the Agency's legal experts to mitigate risks of misinterpretation.
- Q4: Do we need to have an indirect cost rate already approved by the EPA, or can we use one approved by another federal agency that may be accepted in the submitted grant budget?
- A4: EPA will allow you to budget for indirect costs using your current (not expired) Negotiated Indirect Cost Rate (NICRA) Agreement approved by your cognizant federal agency, unless there is a statutory or administrative limitation on the EPA award that limits indirect costs. Your cognizant federal agency is responsible for negotiating your indirect cost rate on behalf of the entire Federal government, and it is typically the Federal agency that provides you with the most direct funding.
- According to EPA's Indirect Cost Policy and Guidance for Recipients of EPA Assistance Agreements, EPA will allow recipients without a current NICRA to use their proposed indirect cost rate to budget for indirect costs, if they submitted their current indirect cost rate proposal to their cognizant agency for approval. However, they cannot drawdown EPA funds for indirect costs, and/or using unrecovered indirect costs as cost-share, until their rate is approved by their cognizant agency.
- Q5: Is there an initiative to create a universal application process and recommendations for other related grants?
- A5: EPA is considering ways to streamline the application process for EPA grants. This includes considering feedback from applicants.
- Q6: SAM.gov and threshold-type questions that come in during the competition are time sensitive. Will there be additional hotlines implemented to respond to these questions?

- A6: SAM.gov is a U.S. General Services Administration computer system, and assistance is available at the Federal Service Desk (fsd.gov) 24 hours a day. EPA does not have the ability to resolve issues with SAM.gov. Grants.gov is managed by the U.S. Department of Health and Human Services and support is available at the [support webpage](#). EPA recommends that applicants complete [SAM.gov and Grants.gov registration](#) well before the application deadline. For eligibility and threshold questions unrelated to SAM.gov or Grants.gov, contact the EPA point of contact listed in Section 1 of the NOFO.
- Q7: The Climate and Community Change NOFO targeted underserved communities, but the application process was difficult for these communities to apply for given their limited capacity. What lessons from that NOFO are being applied to improve this process?
- A7: EPA is currently evaluating NOFOs and the application process to identify opportunities to simplify and improve accessibility.
- Q8: Does the plan include clarifying updates from the Office of Management and Budget (OMB) on cost limits, such as the de minimis indirect cost rate and equipment costs, in upcoming NOFOs?
- A8: EPA has conducted webinar trainings on the changes to 2 CFR 200, which can be found on the [EPA webinar webpage](#). RAIN-2018-G04-R1 has been updated to reflect the changes to the Micro-Purchase and Simplified Acquisition Threshold for Procurement, and RAIN 2018-G02-R2 has been updated to reflect the changes to the indirect cost guidance. EPA NOFOs incorporate these references, as well as the [EPA NOFO Clauses](#), which have been updated to reflect the 2 CFR 200 changes.
- Q9: Will the application forms be simplified as part of this process? We used to be able to only submit the proposal in response to the NOFO, but now we're required to submit all the grant paperwork that's required as if we were actually awarded. This is cumbersome since most of the people applying won't be selected so the paperwork is unnecessary. For those that are selected, EPA normally requires changes to the documents, so it doesn't seem to be simplifying anything. This adds additional work for applicants.
- A9: EPA is deliberating on reducing the number of forms required for application as part of the NOFO simplification effort.
- Q10: Where can the new NOFOs be found?
- A10: All EPA NOFOs are published on [Grants.gov](#).
- Q11: Will future NOFOs address E.O. 12372 "Intergovernmental Reviews" as SAM.gov references the NOFO it is based on the Catalog of Federal Domestic Assistance (CFDA)? This would be helpful information.
- A11: Yes, NOFOs issued after October 1, 2024 address Intergovernmental Review. Guidance to inform recipients and applicants about how to determine which EPA grant programs and activities are subject to Intergovernmental Review requirements are available on the [EPA website](#).
- Q12: Where can agency staff go to learn more about understanding the NOFO, grants, and receive basic training?

- A12: Grants training for applicants and recipients can be found at [Recipient Training Opportunities webpage](#). For training related to specific grant programs, please reach out to the EPA program contact. You can also contact EPAGrantsInfo@epa.gov for more information.
- Q13: Will a recording of this be made available later?
- A13: The recording as well as the presentation will be available on the [2 CFR Updates to the Appendix, NOFOs, and Competition Webinar webpage](#).
- Q14: Is Grants.gov the best place to find NOFOs as soon as they are open, or are there individual EPA program distribution lists that may make them available earlier?
- A14: Grants.gov is the best place to find funding opportunities. EPA publishes all grant opportunities on Grants.gov before publishing anywhere else.
- Q15: The regulation now allows a de minimis rate of up to 15%, compared to the previous 10%. If your current rate is 12%, should you continue using 12%? Additionally, if the rate ends up being lower at the end of the year, is it necessary to update it?
- A15: A recipient with a current federally negotiated indirect cost rate cannot use the de minimis indirect cost rate. Therefore, a recipient with a current approved rate of 12% must continue to use their approved rate of 12%. Recipients without a current approved IDC rate are allowed to use a de minimis rate of less than 15%. If a recipient knows their actual rate is only 12%, then they should use a de minimis rate of 12% so they don't overcover indirect costs
- Q16: Frequently when NOFO FAQs are released, the same technical language causing confusion is repeated in the answers rather than clarifying the question. Will FAQ responses be similarly updated using language that is more accessible to potential applicants?
- A16: The Plain Writing Act requires that federal agencies use clear government communication that the public can understand and use. Also, if you have questions, please email the EPA Contact(s) listed in Section 1 of the NOFO.
- Q17: Will the competition period be longer because all the NOFOs will have a new look?
- A17: The grant regulations at 2 CFR 200.204(b) requires that all funding opportunities are available for application for at least 60 calendar days.
- Q18: Is the multi-factor authentication relatively new in the Automated Standard Application for Payments (ASAP) system?
- A18: The multi-factor authentication requirement for the U.S. Department of Treasury's Automated Standard Application for Payments (ASAP) went into effect on September 15, 2023. For more information on this requirement, including resources on enrollment, please see RAIN-2023-G03, [Required Use of ID.me to Sign into ASAP.gov](#).
- Q19: What is the process if an applicant faces challenges while submitting on time due to issues like internet problems?
- A19: Each NOFO contains procedures that applicants should follow when facing technical issues in 5.D - *Technical Issues with Submission*.

Q20: If it is a Small Business Innovation Research (SBIR) program grant, will another indirect cost rate from another federal agency be acceptable? It seems like the agency will not accept the Defense Contract Audit Agency indirect cost rate.

A20: Federally negotiated indirect cost rates must be accepted by all federal agencies. A federal agency can only require a rate different from the recipient's negotiated rate when required by Federal statute, regulation, or an administrative limitation.

Q21: Do applicants need an ID.me account? Or are they only required at the time of drawdown?

A21: Applicants do not need an ID.me account to apply for EPA grants. For more information on the ID.me requirement, including resources on enrollment, please see RAIN-2023-G03, [Required Use of ID.me to Sign into ASAP.gov](#).