Region 10 Tribal Environmental Staff Guide to the Indian Environmental General Assistance Program (IGAP)

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Table of Contents

Introduction to IGAP	4
IGAP Basics	4
Financial Management Requirements	5
Regulations and Guidance Specific to the IGAP Program	5
Mandatory Requirements for New Applicants	6
Restrictions in the IGAP Program	7
Tribal Staff Responsibilities: Day to Day Management of IGAP Grants	7
AWARD DOCUMENT	8
IGAP WORK PLAN ALLOWABLE ACTIVITIES	11
Activities Not Eligible Under IGAP	
ENVIRONMENTAL RESULTS AND WORK PLAN DEVELOPMENT	23
WHAT'S A LOGIC MODEL?	26
REGION 10 IGAP: WORK PLANS AND BUDGETS	31
40 CFR Part 35 A & B - Work Plan Requirements	32
Narrative Introduction	
INGREDIENTS OF AN IGAP WORK PLAN	34
Components	34
Outcomes	35
Outputs	35
Commitments	
Quality Assurance Project Plans	36
Unmet Needs/Supplemental Projects	37
Alaska IGAP Peer Assistance Network	37
Additional Funding Opportunities in the IGAP Program	38
REGION 10 EXAMPLE—WORD FORMAT NARRATIVE INTRODUCTION	39
Joint Performance Evaluation Process Statement	41
EPA Roles And Responsibilities Statement	41
COMPLETING THE WORD VERSION WORK PLAN TEMPLATE	41
Estimated Component Cost	42
Region 10 Example: Work Plan Format	42
COMPLETING AN IGAP BUDGET (Adobe Format)	43
Personnel & Fringe Benefits	
Total work Years and Estimated Component Work Years	44
Travel	
Equipment & Supplies	
Contracts & Consultants	48
Other	
Indirect Costs	50
FORMS – COMPLETING THE APPLICATION PACKAGE	52
SF 424 – Application for Federal Domestic Assistance	
SF 424a – Budget Information	
SF424b – Assurances – Non-Construction Programs	64
Certification Regarding Lobbying	
Form 4700-4: Preaward Compliance Review	
Key Contacts	69
ENTERING WORK PLANS IN GAP ONLINE	70

Changing Password for GAP Online Tribal User Accounts	72
First Time Configuration for GAP Online/User Profile	73
User Profile	73
GAP Online Navigation	74
Creating a Work Plan	
Adding (attaching and uploading) Narrative Background in GAP Online	79
Adding (attaching and uploading) Budget in GAP Online	
Adding Position Information in GAP Online	
Adding Other Attachments in GAP Online	
Create a Work Plan Component	
Delete a Work Plan Component	88
Create a Work Plan Commitment	89
Delete a Work Plan Commitment	90
Sending Work Plan to Project Officer	91
VIEWING/EDITING A WORK PLAN IN GAP ONLINE	.92
Recalling a Work Plan	94
CREATING/EDITING PROGRESS REPORTS IN GAP ONLINE	.95
Updating Progress Reports	99
Progress Report Comments	100
SUMMARY REPORTS IN GAP ONLINE	
MANAGING YOUR IGAP GRANT AFTER IT HAS BEEN AWARDED	107
EPA Roles and Responsibilities	108
How to Access Your Grant Funds	110
Roles of Others in the IGAP Program	.116
IGAP Recipient Roles	
Programmatic Terms and Conditions	.117
AWARD DOCUMENT AND ADMINISTRATIVE TERMS AND CONDITIONS	
Example Award Document/Administrative Terms and Conditions	
PERIODIC (QUARTERLY/SEMIANNUAL/ANNUAL) PROGRESS REPORTS	
Quarterly Report Example (Word Version)	
PROGRAMMATIC ADVANCED POST AWARD MONITORING (APAM)	
CLOSING OUT YOUR IGAP GRANT	
Final Draw Down Request	.135
Federal Financial Report (SF425)	.136
Minority/Women's Business Enterprise Utilization Report (MBE/WBE)	
Other Reports (if applicable)	.138
Final Technical/Performance Report	.139
RETENTION AND ACCESS REQUIREMENTS FOR RECORDS	141
ADMINISTRATIVE GRANTS MANAGEMENT: FISCAL MANAGEMENT	141
New and Continuing Grants: RemindersTRIBES' RESPONSIBILITIES: AUDITS AND REVIEWS	.142
TRIBES' RESPONSIBILITIES: AUDITS AND REVIEWS	.143
ADMINISTRATIVE GRANTS MANAGEMENT: ADVANCED POST AWARD MONITORII	
(APAM) REVIEWS	
ENFORCEMENT	148
SPECIAL AWARD OR SUBAWARD CONDITIONS FOR "HIGH RISK" RECIPIENTS	
DISPUTES	.150
EPA ADMINISTRATIVE GRANTS MANAGEMENT CONTACTS	.152

INTRODUCTION TO IGAP

Mission of EPA

The Environmental Protection Agency (EPA) was formed in 1970, with a mission to protect human health and the environment (www.epa.gov). To accomplish this mission, EPA regulates limits for pollutants and conducts compliance/enforcement activities, and provides financial assistance to partners through grants and cooperative agreements. States, Tribes, local governments, universities, and others may receive this assistance. EPA has approximately 90 financial assistance programs, including the Indian Environmental General Assistance Program (IGAP).

IGAP Basics

EPA's policy is to work with Tribes on a government-to-government basis to enhance environmental protection in Tribal communities. In 1992, Congress passed the Indian Environmental General Assistance Program Act which authorizes EPA to provide IGAP grants to federally recognized Tribes and Tribal consortia for planning, developing, and establishing environmental protection programs.

The IGAP program is exempt from competition. EPA has determined that competition for IGAP is not practical because of the need to provide a clear and stable source of base funding for program development and capacity building for Tribes consistent with the primary statutory purpose of the program. Therefore, all applications that meet the stated requirements in program regulations will be funded if funds are available.

- IGAP is one of many programs EPA uses to give financial assistance to partners; **IGAP is for federally recognized Tribes and consortia**.
- EPA develops a funding announcement each year (usually in October) for the IGAP program and sends it to federally recognized Tribes to inform them of the funding opportunity. Firm deadlines for submitting draft proposals and complete application packages are included.
- The **minimum award is \$75,000** and one grant **cannot go beyond 4 years**; new grants generally should not duplicate the objectives of previous grants.

Financial Management Requirements

- 2 Code of Federal Regulations (CFR) Part 225 (Cost Principles (http://www.whitehouse.gov/omb/grants_circulars) (formerly known as OMB Circular A-87, Cost Principals) specifies costs that are allowable or unallowable under your grant.
- Office of Management & Budget (OMB) Circular A-102:
 (Administrative Requirements for Grants and Cooperative Agreements http://www.whitehouse.gov/omb/grants_circulars) notes minimum administrative requirements.
- OMB Circular A-133 (Audits (http://www.whitehouse.gov/omb/grants_circulars) lists the minimum requirements for mandatory single audits (applies to entities that spend more than \$500,000 in federal funds within a year) and provides information on program-specific audits.
- 40 CFR Part 31:
 (http://www.access.gpo.gov/nara/cfr/waisidx_04/40cfr31_04.
 html): Includes administrative requirements, such as requirements for financial management systems, equipment purchases under a grant, payment (draw down) information, how to maintain your records and grant files and for how long, financial reporting, Minority Business Enterprise/Woman Owned Business Enterprise (MBE/WBE), and other reports.

Regulations and Guidance Specific to the IGAP Program

IGAP has specific regulations and guidance to help grantees meet the administrative and programmatic conditions of the grant agreement.

• 40 CFR Part 35 (Subpart B) 35.500 (http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=ac1a260bb0534f8f74214464c731e0ac&rgn=div 5&view=text&node=40:1.0.1.2.32&idno=40: Describes requirements for an application for funding, including the procedure for submitting a work plan or for making a change to an existing work plan;

how your performance is evaluated; allowable activities; and implementation activities in solid/hazardous waste.

- In addition to regulations, the Indian General Assistance Program (IGAP) 2006 Grants Administration Guidance and Guidelines on the Award and Management of General Assistance

 Agreements for Indian Tribes (March 9, 2000) provide additional clarification on what is allowable and not allowable under IGAP. Access both at http://www.epa.gov/tribal/grantsandfunding/gap.htm). Please note: these documents are currently being revised and are scheduled to be replaced in spring 2013 with a new Guidance/Guidebook for Tribal Environmental Program Development. More information is available at http://www.epa.gov/tribal/index.htm#guide.
- The National IGAP program office is in Washington DC, managed by the American Indian Environmental Office (AIEO Mandatory Requirements for New Applicants

New grantees are required to complete certain activities within the first few years of receiving an IGAP grant including:

- A review of Tribal administrative and fiscal policies and procedures
- Conducting an environmental assessment (usually includes a questionnaire given to the community)
- Developing a Tribal Environmental Plan

Additionally, all new applicants or new IGAP staff should attend an IGAP grants management training session. The administrative/fiscal review should be repeated whenever there are substantial changes to the Tribe's financial or administrative systems. The Tribal Environmental Plan should be revised every two or three years or whenever it becomes outdated.

Administrative Capacity Building

IGAP is a capacity building program that includes both administrative and programmatic aspects. Part of the IGAP program's purpose is to strengthen and develop administrative systems, including things like purchasing and legal capacity.

• To effectively manage your program, administrative capacity building is a good place to start in the first year.

- Review written policies and procedures for purchasing/leave/travel etc. and administrative and financial systems to see if they are adequate.
- Consider having an independent entity assist you with evaluating your management and financial systems to determine if they need any additions/revisions.
- IGAP programs that build administrative capacity initially often do better over time than those that go right into environmental work.
- Effective records management is a good way to get your environmental program off to a solid start.
- Once the basic/mandatory work is done, you may want to establish some baseline data in areas like water quality, air quality, or you may want to start a recycling program or work to improve your landfill.

Restrictions in the IGAP Program

- Environmental planning/development/training is allowable, as is administrative/financial/policy work and compiling baseline data in any media such as air or water is also OK **but:**
- Ongoing water quality/air quality implementation is not allowed under IGAP.
- The intent of the program is to get environmental programs started, with the goal of making the programs self-sustaining in the future.
- Implementation is allowable in the area of solid and hazardous waste. Recommended activities include: 1) Conduct a solid/hazardous waste assessment; 2) Develop a solid waste management plan; 3) Begin implementing the program based on the assessment results (hire landfill operator, establish recycling program, and work with partners in your area).
- Work plans should not be identical form year to year, and should include new focus areas or show progress or expansion from previously completed objectives.

<u>Tribal Staff Responsibilities: Day to Day Management of IGAP</u> Grants

- 1. Grant recipients must monitor progress on approved work plans, making sure that work gets done on schedule within the proposed timeline. **EPA looks at progress through quarterly reports.**
- The Tribal Environmental staff (Environmental Coordinator, Environmental Assistant, Environmental Technician, Environmental Director, Environmental Manager, Environmental Specialist, etc.) has a wide variety of roles.

- For IGAP, the Tribal Council and the work plan dictate the role of IGAP staff members.
- Some Tribal environmental staff members do just the work that is laid out in full detail in the work plan components (the programmatic work), while other staff (Tribal Administrator, Bookkeeper, Administrative Assistant, etc.) handle administrative and financial duties associated with the grant.
- Some environmental staff members do programmatic work, plus administrative and financial tasks.
- 2. While money should be spent as proposed in your budget, there is some flexibility. If a change is significant or changes the scope of work, or if you are requesting additional funds, a formal amendment will be needed; if a change is minor, an email to your project officer explaining the change is sufficient. Discuss potential modifications with your project officer to help determine whether a proposed change is minor or if it requires a formal amendment.

Award Document

- The Grant Agreement is the initial award document issued by EPA, and is signed by the authorized Tribal official and EPA.
- Second (or later) year of IGAP: amendments to the grant agreement (Assistance Amendments) look very similar to original document, adding time, money, or both. The original grant may continue to be amended through the maximum 4 year period for an IGAP grant.
- At the top right of the grant agreement or amendment is the grant number (GA-XXXXXXXX). Reference it when you turn in reports, request a budget revision, etc.
- If you have a change in program staff, let EPA know within 10 days so it is clear that the grant is being managed and work plan tasks (commitments) are being completed.

Award Document Format

- 1. Project Title and Description
- 2. Budget Period
- 3. Project Period
- 4. Total Budget Period Cost (cumulative total from your original award through the current amendment)
- 5. Total Project Period Cost
- 6. Signatures: Armina Nolan (Grants & Interagency Agreement Administration Unit manager)

- 7. Signatures: Tribal authorized signature
- 8. The pages following the signatures contain budget and payment information, as well as administrative and programmatic terms and conditions. By signing the agreement, you are agreeing to meet those requirements.
- 9. Administrative terms and conditions list the Office of Management & Budget (OMB) circulars and other guidance.

Records Management - EPA's 6-Part File Folder

Using this 6 section folder system is recommended, as is keeping a daily log of the IGAP objectives and tasks you're working on.

- **Section 1**: Grant agreement/amendment
- **Section 2:** Work plans, budgets, applications, Quality Assurance Project Plan, etc.
- **Section 3:** Quarterly reports, project deliverables (ex. solid waste management plan), copies of contracts
- Section 4: Communication and correspondence by telephone, email
- Section 5: Copies of MBE/WBE, Payment Requests, and SF425 forms.
- **Section 6:** Final performance/technical report for the entire project and other close out documentation; copies of Integrated Financial Management Systems (IFMS) documents.

Communication

- Communicate with your project officer frequently, by email, phone, fax, letter, or in person. Emails and letters provide written documentation for the file.
- Let your project officer know when there are problems or issues that require immediate attention. Your project officer can provide suggestions or referrals for assistance.



Region 10 IGAP: Before You Apply

Requirements That Come With an Award of Funds

As a legally binding document, your signed assistance agreement means that you are agreeing to follow all regulations, terms, and conditions listed in your IGAP grant agreement. In addition to performing the work indicated in your grant work plan, you will be required to submit reports and certifications on a regular schedule. You will also be required to manage and administer your assistance agreement according to standards established by applicable laws and regulations. Grant activities are subject to review and/or audit.

Administrative Grants Management

Every grant applicant and recipient should read and be familiar with

the following:

If you are this type of applicant	Refer to these Office of Management and Budget Circulars	And these EPA regulations		
Indian Tribes & Alaska Natives	CFR 225 (formerly A-87 Cost Principles) A-133 (Audit Requirements)	40 CFR Part 31 40 CFR Part 35		

These circulars and regulations address the following basic areas:

Deadlines/time frames	Reporting
Allowable Activities	Disposition PoliciesOutputs and Outcomes
Standards of Conduct	• Loss Prevention/Insurance Coverage
 Procurement Procedures 	 Inventory Controls
• Competition	 Supplies and Equipment
Procurement Standards	Property Management Systems
	• Cash Management Procedures
• renormance keporting	Systems • Internal and Budget Controls
Record Keeping ProceduresPerformance Reporting	• Accounting and Financial Reporting
• Personnel Policies	Standards
Management Capabilities	Financial Management

IGAP WORK PLAN ALLOWABLE ACTIVITIES

Following are examples of activities that a Tribe might want to consider including in an IGAP proposal. Some activities are mandatory (noted below) and must be completed at least once. Activities will vary from Tribe to Tribe depending on the needs and priorities of each Tribe.

Program-Specific Capacity-Building

Purpose: The objective of program specific capacity building efforts is to establish Tribal environmental programs and the capacity to administer them. Activities funded under IGAP may include assistance with developing administrative and technical capability, and planning and establishing an environmental management program.

I. General Program Development Activities

- Establish a Tribal Environmental Program Office (hiring and training staff, purchasing equipment, etc.).
- Hire staff to develop the infrastructure for an environmental office.
- Conduct an environmental inventory to identify all potential pollution sources (i.e., a visual assessment, a community questionnaire, compiling all existing data from various sources (Tribal, federal, state, local) to assess environmental conditions). NOTE: THIS TASK IS MANDATORY AND MUST BE INCLUDED AS A ONE TIME ACTIVITY TO BE DONE UNDER IGAP. Updates to the inventory are also encouraged.
- Prioritize current environmental conditions and develop a Tribal Environmental Plan outlining environmental needs for future years, identifying program areas of interest, and estimating funding needs. NOTE: THIS TASK IS MANDATORY AND MUST BE INCLUDED AS A ONE TIME ACTIVITY TO BE DONE UNDER IGAP.
- Acquire training in environmental program areas (water, air, waste, pollution prevention, climate change, etc.).
- Conduct education outreach to community members (distribute newsletters, hold community meetings, etc.).

Building Legal Capability

• Assess the legal sufficiency of the Tribe's approach to environmental

- regulation including enforcement of codes and activities that may impact air, land, and water (i.e., obtain legal consultation in developing regulations, developing permitting requirements, building upon legal structure, etc.).
- Plan, develop, and establish procedures to correct any legal deficiencies, and/or establish a new legal system and procedures, including policies and guidance, for environmental program management.

Building Administrative Capability

Assess for adequacy and/or revise the Tribe's current grants management procedures including accounting, auditing, evaluating, reviewing, and reporting, to meet the requirements of 40 CFR 31; 40 CFR Part 35 and 2 CFR Part 225 (formerly OMB Circular A-87). Obtain accounting/administrative consultation, if needed, to assess current procedures and to insure that they are adequate. NOTE: THIS TASK IS MANDATORY AND MUST BE INCLUDED AS A ONE TIME ACTIVITY TO BE DONE UNDER IGAP.

Environmental Sampling

Any activities which involve environmental measurements (soil, water, or air testing) require an EPA-approved Quality Assurance Project Plan prior to performing such activities. It is suggested that the following commitment (task) be added to a work plan that includes such testing:

Develop a Quality Assurance Project Plan (QAPP), which must be approved by EPA's Quality Assurance Management Section prior to performing any environmental measurements or any assessment which requires sample collection or data compilation.

Examples of Activities Involving Environmentally Related Measures

- Activities that collect data to establish/determine the states/conditions of environmental or ecological systems and the health of human populations;
- Activities that collect data to establish the ambient conditions in air, water, sediments, and soil in terms of physical, chemical, radiological, or biological characteristics;
- Activities that collect data to establish/categorize radioactive, hazardous, toxic, and mixed wastes in the environment and to establish their relationships with and/or impact on human health and ecological systems;

- Activities that monitor and quantify the waste and effluent discharges to
 the environment from processes and operations (e.g., energy generation,
 metallurgical processes, chemicals production), during either normal or
 upset conditions (i.e., operating conditions that cause pollutant or
 contaminant discharges);
- Activities that use environmental data to develop environmental technology for waste treatment, storage, remediation, and disposal, pollution prevention, and pollution control;
- Activities that use environmental data in mapping environmental process and conditions, and/or human health risk data, etc. (e.g., geographical information system);
- Activities that generate data from the evaluation of environmental technology used for waste treatment, storage, remediation, and disposal; pollution prevention; and pollution control;
- Activities that generate/collect data to support enforcement and/or compliance monitoring efforts;
- Activities that collect/generate data for the evaluation and/or demonstration of environmental technology (e.g., treatability and pilot studies);
- Activities that investigate and collect data to determine chemical, biological, physical, or radioactive constituents in environmental and ecological systems, and their behavior and associated interfaces in those systems, including exposure assessment, transport, and fate;
- Activities that collect and/or generate data from the development and evaluation of methods for use in the collection, analysis, and use of environmental data;
- Activities that involve the development, evaluation, and use of computers or mathematical models (and their input data) to characterize environmental processes or conditions;
- Activities that use secondary data (i.e., environmental data that were collected for other purposes or obtained from other sources, including literature, industry surveys, compilations from computerized databases

and information systems) for the development and/or evaluation of computerized or mathematical models of environmental processes and conditions, and collect/generate data from the process; and

• Activities that collect and/or use environmental data for monitoring/addressing concerns over the occupational health and safety of personnel in EPA facilities (e.g., indoor air quality measurements) and in the field (e.g., chemical dosimetry, radiation dosimetry).

II. Clean Water Act Activities

The goal of the Clean Water Act (CWA) is "to restore and maintain the chemical, physical, and biological integrity of the nation's water", primarily through a prohibition against discharging pollution into the waters of the United States. While not comprehensive (certain sources of pollution are not directly regulated), the CWA does deal with a complex variety of matters concerning water pollution, including the following: grants for construction projects, research and study, development of water pollution control programs, permitting and regulation of discharges, establishing water quality standards and protecting wetland areas. Below are some activities which may be funded under IGAP in order to work towards meeting CWA requirements:

- Identify and assess point and non-point discharge sources potentially impacting waters of the U.S. (this can include a visual assessment, review of historical documents which may help in determining the environmental conditions, taking limited sampling measurements of waters).
- Develop application and proposals for water quality specific grants, including any pre-qualification materials.
- Compile water quality data from all available sources.
- Identify and assess opportunities for water quality protection.
- Identify and assess opportunities for drinking water protection.
- Develop a wellhead protection program.

III. Safe Drinking Water Activities

The Safe Drinking Water Act (SDWA) is the federal law regulating the quality of drinking water from a public water system (PWS). The purpose of the act is to ensure that the drinking water supplied to the public is safe for human consumption. EPA has the responsibility of setting minimum national drinking water standards which must be met by all PWS (the SDWA does not apply to those water systems that are not classified as a PWS). Below are some activities

which may be funded under IGAP, to work towards meeting SDWA requirements:

- Assess activities which impact drinking water sources (septic tanks, underground storage tanks, etc.).
- Develop a Tribal utility organization responsible for operating and maintaining a public water system.
- Acquire training for water system operators, Tribal utility members, and Tribal leaders.
- Establish standards for well construction and for community septic systems.
- Identify and assess all water resources, including compliance and contamination potential.
- Develop codes, regulations, and ordinances to regulate public water supply systems, including non-Tribally owned and operated systems on Tribal land and in Alaska Native Villages and Tribally-owned and operated systems.

IGAP funding can be used by a Tribe for drinking water and wastewater asset protection capacity building activities when it is used to plan the program, such as setting goals and designing an approach; developing the program from plans on paper to actions that help establish the program; and establishing the program, which might include performing a "test drive" of the program to work out the glitches, and make the program is secure.

IV. Clean Air Act Activities

Tribes typically use IGAP funding to conduct a needs assessment for an air program, which can take one to several years to complete. At the end of the assessment phase, a Tribe will evaluate whether future air activities are needed, and for what type of funding to apply. Some typical air assessment activities are listed below.

• *Training* - May include, but is not limited to, workshops available through the Northern Arizona University's Institute for Tribal Environmental Professionals (ITEP), the Tribal Air Monitoring Support (TAMS) Center, California Air Resources Board (CARB), EPA, and others. Networking between Tribes, states, counties, and educational facilities could be an additional component of this training.

- *Develop an Emissions Inventory* Calculate emissions of air pollutants from sources within Tribal lands or Alaska Native Villages in order to estimate impacts on Tribal air quality and assess the need for air pollution control regulations.
- *Air program needs assessment* After basic air pollution training is completed, determine the extent of air pollution issues on Tribal lands or in Alaska Native Villages and develop an assessment of the need for a longer-term Tribal air program.
- Acquisition of existing air quality data from agencies or neighboring communities Agencies or other communities may have air quality monitoring data helpful to the Tribe in assessing air quality.
- Investigate impacts of neighboring sources on Tribal air quality Acquire emission data from air quality permits and compliance data from permitting agencies for nearby sources impacting Tribal air quality.
- Participate in regional initiatives such as the Regional Tribal Operations Committee (RTOC), the Western Regional Air Partnership (WRAP), the National Tribal Air Association (NTAA), or local coalitions.
- *Community outreach/education* Provide information on air pollution issues to the local community, schools, and Tribal government through presentations, brochures, newsletters, etc.
- *Develop a Draft Monitoring Plan* Develop a plan for gathering baseline air quality data.
- *Submit a CAA 103 Proposal* If the Tribe decides to pursue a long-term air monitoring program, work with EPA Region 10 to develop a CAA 103 air grant proposal.

Note: IGAP funds cannot be used to fund **air monitoring activities** on a long term basis, since that would be considered "program implementation," which is not the focus of IGAP funding. Tribes that seek an ongoing air monitoring program, or other long term air quality work, are encouraged to pursue CAA §103 funding, or use other sources of funding to support implementation activities. (Note: Receiving funding under the CAA§103 is not guaranteed to all Tribes.)

As resources to fund air activities become increasingly limited under both IGAP and the CAA, it is vital that Tribes work together to leverage resources and share information with each other. Some ideas include:

- Exchange air quality data and emission inventories.
- Share the cost of training by consultants, when needed.
- Join or develop local coalitions of Tribes for support and to discuss issues.
- Share portable monitors, where feasible.

V. Solid/Hazardous Waste Activities

Congress directed EPA to develop standards for the disposal of solid waste. The two main regulations EPA developed for the handling and disposal of solid waste are located in 40 CFR Parts 257 and 258. Solid/hazardous waste implementation activities **are allowed under IGAP.** Below are some activities which may be funded under IGAP in order to work towards obtaining solid waste objectives.

Recommended Phase One:

- Create an inventory of open dumps using GPS location data (requires quality assurance documentation).
- Assess current solid waste management practices.
- Assess the quantity and quality of generated waste.
- Develop an integrated solid waste management plan that is approved by the Tribe's governing body.
- Develop solid waste codes and ordinances to implement the solid waste management plan.
- Assess environmental conditions impacted by open dumping.
- Conduct outreach regarding environmental education dealing with solid waste (i.e., recycling, etc.).

Recommended Phase Two:

- Develop a backhaul program that will remove abandoned vehicles, lead acid batteries, appliances, electronics, scrap metal, used tires, etc.
- Set up transfer stations, recycling centers, composting centers, household hazardous waste collection centers, used oil collection stations, etc.

- National Environmental Policy Act (NEPA) compliance may be required for any construction activities.
- Develop a waste enforcement program to prevent illegal dumping, including using signs to prevent people from dumping.
- Conduct outreach/environmental education dealing with solid waste (i.e. ways to reduce/reuse/recycle).
- Facility planning and feasibility studies; expert consultation; assessments and analysis of market needs; marketing of recycled resources.

Recommended Phase Three:

- Implement removal of abandoned vehicles, appliances, scrap metal, used tires, etc.
- Cleanup and closure of open dumps or scattered waste sites.
- Continue outreach/environmental education dealing with solid waste.

VI. Chemical Emergency Planning/SARA Title III- Activities

The Superfund Amendments and Reauthorization Act (SARA) Title III has two purposes: 1) to encourage and support emergency planning for responding to chemical incidents, and 2) to provide local governments and the public with timely and comprehensive information about possible chemical hazards in communities. Below are some activities which may be funded under IGAP to work towards meeting SARA Title III objectives:

- Establish and appoint members of a Tribal Emergency Response Commission (TERC) and/or Local Emergency Planning Committee (LEPC).
- Develop and obtain Tribal approval for ordinance/resolution establishing authority of TERC/LEPC.
- Develop a Chemical Emergency Notification Plan.
- Develop hazardous material program codes and regulations.
- Identify and assess potential chemical emergency sources (hazard analysis).
- Develop a Tribal Chemical Emergency Preparedness Response Plan.
- Have appropriate staff take awareness training.

- Conduct community outreach to assure knowledge of and responsiveness to an emergency plan.
- Conduct periodic emergency exercises.

VII. Underground Storage Tank Activities

An underground storage tank (UST) is any tank (including underground piping connected to the tank) that has at least 10 percent of its volume underground. The UST regulations (40 CFR Part 280) cover notification (registration), performance standards for new and existing tanks, tank closure, release detection, cleanup activities, financial responsibility, and reporting and record keeping. Below are some activities which may be funded under IGAP to work towards meeting UST objectives:

- Identify all operating and abandoned USTs and compare list with EPA's existing inventory.
- Develop codes, regulations, and ordinances to regulate UST management activities.
- Provide training for staff on UST management.

VIII. Radon

The purpose of a non-regulatory radon program is to increase the public's awareness of health effects from exposure to radon and increase the number of homes/schools tested and mitigated, if necessary, for radon gas. Radon is a naturally occurring radioactive gas that comes from the decay of uranium and is the second leading cause of lung cancer, next to smoking. Radon gas has been found in areas all over the world. The only way to know if a home or school has elevated radon levels is to perform radon testing. The U.S. Surgeon General has recommended that all homes in the U.S. be tested. EPA has also recommended that all schools be tested. Radon testing is simple and inexpensive. If high radon levels are found, there are ways to mitigate and prevent radon from seeping into a building. EPA has developed model radon resistant building codes that can reduce the cost of installing a radon system during construction. Below are some activities which may be funded under IGAP to address radon issues:

- Obtain radon training (testing and mitigation)
- Write a Quality Assurance Field Sampling Plan to test for radon.
- Conduct community outreach on radon.
- Conduct radon sampling.
- Conduct outreach on sampling results.
- Encourage radon resistant new construction.

IX. Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

The purpose of FIFRA is to regulate the manufacture, distribution, sale, and use of pesticides so as to minimize risks to human health and the environment. A pesticide is defined as any substance intended to prevent, destroy, repel, or mitigate pests. FIFRA requires registration of all pesticides; restricts use of certain pesticides; establishes requirements for the certification of pesticide applicators; authorizes experimental use permits; establishes the conditions for cancellation of pesticides; and requires the registration of pesticide manufacturers. Below are some activities which may be funded under IGAP to address Tribal pesticides issues:

- Assess current and historical pesticide use, sale, and distribution, and identify pesticide concerns on Tribal lands and in Alaska Native Villages. This can include development of a questionnaire and conducting interviews to gather information regarding sites where pesticides are/were used, and types/amounts of pesticides used, sold, distributed, stored and disposed of on Tribal lands and Alaska Native Villages.
- Attend appropriate EPA and non-EPA training.
- Develop codes, regulations and ordinances.
- Develop other regulatory and non-regulatory policies which enable the Tribe to monitor and control pesticide use on Tribal lands and Alaska Native Villages (examples are Pesticide Management Plans, Integrated Pest Management Plans, Pesticide Use Notification System, and Pesticide Permit Program).
- Assess and develop Tribal infrastructure to support a pesticides program, including:
 - 1) Developing policies necessary to implement codes/ordinances or other Tribal pesticide policies;
 - 2) Identifying impacts of pesticides on other environmental media;
 - 3) Determining how information about pesticides can be shared between programs;
 - 4) Developing mechanisms to report and respond to pesticide incidents; and
 - 5) Develop application for pesticide cooperative agreement, as necessary.

X. Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) authorizes EPA to identify and control toxic chemical hazards to human health and the environment. Children are very vulnerable to the hazards of asbestos and lead exposure. Two programs under this statute address these specific toxic hazards through the asbestos in schools rule and the lead-based paint hazard reduction program. Awareness or outreach/education and proper management of asbestos-containing materials (ACM) and surfaces coated with lead-based paint are important in the prevention of exposure. In addition, EPA has developed regulations that include training requirements to assure the availability of a qualified workforce to conduct asbestos and lead activities properly. EPA also requires the disclosure of lead-based paint in pre-1978 housing. Below are some activities which may be funded under IGAP to address asbestos and lead issues:

A. Asbestos

- Develop and/or provide published informational material on asbestos, its hazards, and where it might be found in the home, schools and other buildings.
- Increase awareness of what practices may disturb ACM (sanding, abrading, or scraping material) and promote good management practices to minimize disturbance of ACM and the release of airborne fibers.
- Provide appropriate training to Tribal environmental staff to develop capability and expertise to address Tribal asbestos concerns in public buildings.

B. Lead

- Educate Tribal and community members regarding the dangers of lead and areas in which lead poisoning can occur.
- Increase awareness by encouraging community involvement in a lead prevention project.
- Provide educational outreach to small children by using hands-on science.
- Provide lead awareness seminars to the community.
- Conduct inspections and risk assessments of Tribal housing units.

XI. Pollution Prevention

Pollution prevention means reducing pollution at its source, before it is created. The Pollution Prevention Act of 1990 establishes an environmental management hierarchy that emphasizes source reduction over recycling, treatment, and disposal. Source reduction is defined as "any practice that reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment prior to recycling, treatment, or disposal; and which reduces the hazards to public health and the environment associated with the release of such substances, pollutants or contaminants." It also includes protecting the environment through conservation of energy, water, or other materials. EPA has declared that pollution prevention is the "policy of first choice" for solving environmental problems. Pollution prevention activities can be integrated into regulatory programs or be non-regulatory and voluntary. Source reduction efforts can be particularly effective for addressing non-point source pollution related to unregulated sources such as agriculture, indoor air pollution, or household hazardous waste. Below are some pollution prevention activities which may be funded under IGAP:

- From the completed Tribal environmental assessment or inventory, identify priority environmental problems, waste streams, or pollution sources that could be addressed through pollution prevention (source reduction).
- Develop a pollution prevention policy for Tribal environmental protection activities.
- Review and modify Tribal environmental regulations to incorporate source reduction.
- Develop voluntary technical assistance/outreach programs to help priority sectors (homes, schools, stores, other businesses, council offices, landfills, auto repair, casinos, agriculture) adopt source reduction measures.
- Inventory the use of household hazardous wastes (HHW) on Tribal lands and in Alaska Native Villages.
- Develop an outreach program for minimizing HHW generation by promoting use reduction, proper use and disposal of chemical products, and viable alternatives.
- Develop an outreach program on the use of the alternative products.

For more information on potential project ideas see the Pollution Prevention Resource Exchange website, www.p2rx.org

XII. Activities Not Eligible Under IGAP



Construction of specific facilities or site-specific actions are not eligible under IGAP, with the exception of Solid and Hazardous Waste projects, unless EPA determines funding such activities is necessary to carry out the purpose of the program. Examples of non-eligible activities include, but are not limited to:

- leaking underground storage tank remediation
- wastewater treatment facility construction
- operation and maintenance of sanitary facilities
- preparation of site-specific Environmental Impact Statements for the purpose of NEPA compliance with the exception of solid and hazardous waste projects funded by EPA

Environmental Results and Work Plan Development

Awards make up approximately one half of EPA's budget in Assistance Agreements. EPA assistance agreements are one important way that environmental protection is delivered to the public, in partnership with other governments and organizations. EPA's goal is to insure that work funded through assistance agreements furthers its mission to protect human health and the environment and achieves environmental benefits for the taxpayer.

EPA Order 5700.7 Environmental Results under EPA Assistance Agreements

EPA Order 5700.7 supports EPA Grants Management Plan Goal 5, Identifying and Achieving Environmental Outcomes, and establishes EPA policy for environmental results under EPA assistance agreements. It insures that EPA assistance agreements are results oriented and aligned with EPA's *Strategic*

Goals. Order 5700.7 is implemented through existing regulatory requirements for work plan development and performance evaluation in 40 CFR Part 35, addressing environmental results in three stages of the assistance process:

- 1) Funding Announcements (application/funding process);
- 2) Work Plan Development (containing anticipated outputs and outcomes); and
- 3) Performance Reporting (including results and performance measures).
- 40 CFR Part 35 requires clearly defined:
 - work plans
 - outputs (deliverables) and outcomes
 - work plan component time frames and funding amounts
 - a performance evaluation process
 - a performance reporting schedule

How Do We Demonstrate Environmental Results?

Outputs and Outcomes help define, explain, and communicate to others the purpose and the expected environmental results of the project.

Logic models and work plans: Logic models are diagrams used to identify outputs and outcomes and to help develop logical progression from tasks to outputs to outcomes. They explain how an outcome or output supports a goal or objective in a work plan and provide a sound basis for work planning and performance reporting by connecting resources and activities to measurable results.

Performance Measures and Performance Reports: Performance measures are target values for outputs and outcomes, or values used to gauge program or project performance. Performance measures should be built into work plan outputs (also known as deliverables/work products) and performance reports (quarterly or periodic performance reports). Both performance measures and performance reports help you manage projects, and assure you and EPA that you have accomplished the purpose of the project.

Outputs and Outcomes Defined

Outputs/Deliverables are environmental <u>activities</u>, <u>efforts</u>, and/or associated <u>work products</u> that will be <u>produced or provided</u> by a specified date to support

an environmental goal or objective in an IGAP work plan. They must be measurable during the assistance agreement funding period.

Outcomes are the broad, long term results, effects, or consequences that will occur from carrying out an environmental program or activity to support an environmental or programmatic goal or objective in a work plan. Outcomes may be knowledge gained, behavior changes, environmental benefits, and health-related or programmatic results. They should be measureable and are not necessarily achievable during the funding period.

Outputs and Deliverables Specific to IGAP

Examples of IGAP outputs/deliverables might be: conferences attended; materials and contacts gathered; travel reports; meetings held--agendas, notes, materials collected; issues researched--materials gathered, files created, presentations made; reports generated; reports shared and submitted; newsletter articles written; newsletters published; solid waste management plans; baseline assessments conducted/summary reports; community clean-ups--bags or pounds of litter removed and reported; Quality Assurance Project Plans, etc.

Output Test: Will you do it or make it? Is it measurable? Can you count it, or give it a quality rating?

Short-term, Intermediate, and Long-term Outcomes

Outcomes are the results, effects, or impacts of your program. Examples of IGAP Intermediate Outcomes (this year/the next couple of years) might include:

- increase in community knowledge of environmental issues and protection
- increase in Council knowledge of technical resources and funding opportunities
- increase in Tribal grants administration capacity
- decrease in amount of litter in community and recyclables in landfill

Examples of IGAP Long-term Outcomes (next couple of years to 20 years or more) might include:

- increase of 20% in community and Council actions protective of the environment
- increase of 18% in resources and funding sought and obtained by Tribe
- increase of 25% in Tribal programmatic capacity to address environmental issues, indicated by number of environmental projects in place

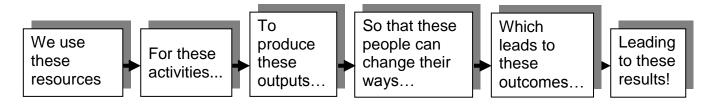
• increase of 15% in quality and safety of environment and subsistence resources, as indicated by water quality baseline samples

Outcome Test:

Is it a result of your work? Is it quantitative? Can you put the words "increase" or "decrease" or "number of" in front of it?

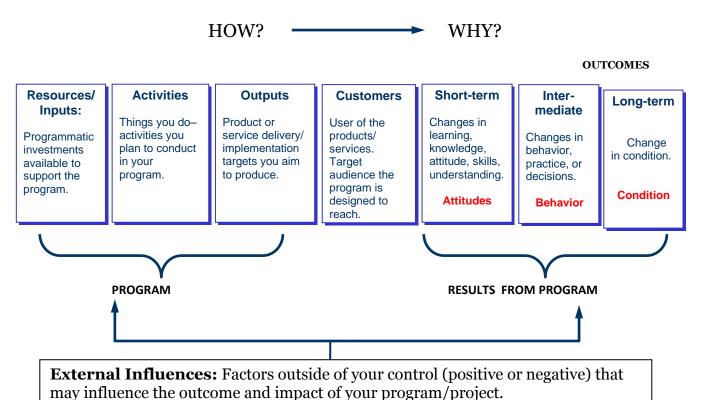
What's a Logic Model?

A logic model is a diagram with text that shows the logical relationships between program elements and the problem to be solved.



Logic models help develop work plans and measures of success by connecting resources with activities and results.

What Does a Logic Model Show?

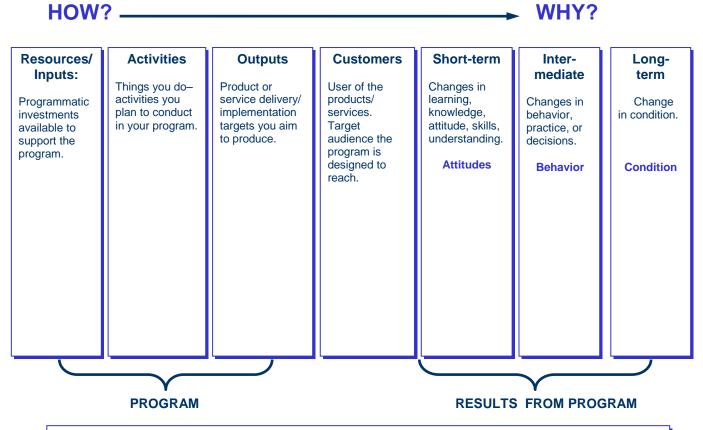


Logic Model Example: Oregon's Toxic Waste Reduction Assistance Program

Goals: Protect public health, safety, and the environment from the risks associated with using toxic chemicals and generating hazardous waste; improve regulatory compliance; and reduce management and disposal costs.

Activities	Outputs	Customer	Knowledge Outcomes	Behavioral Outcomes	Environmental Outcomes
Assist with preparation and implementation of Reduction Plans and meeting regulatory requirements through site visits and follow-up visits, training seminars and workshops, fielded phone calls, educational materials, etc. Resources (FY11) 6.6 FTE \$ 0.52 million	Site visits and follow-up visits Recommendations Training seminars and workshops Published information and outreach materials Fielded phone calls Public meetings	Large quantity generators of hazardous waste Small quantity generators of hazardous waste Conditionally exempts generators of hazardous waste Reporters to the Toxic Release Inventory	Regulated entities increase understanding of regulations and what it will take to achieve regulatory compliance Regulated entities increase understanding of "beyond compliance" options	Regulated entities implement Reduction Plan recommendations Coordination increases between trade associations, local colleges, regulated entities, and local governments Regulated entities more safely manage hazardous waste and toxic chemicals during storage and transportation Regulated entities improve compliance and "beyond compliance" rates	Regulated entities use fewer toxic chemicals and generate less hazardous waste Regulated entities safely dispose of toxic chemicals and hazardous waste Regulated entities reduce the severity of toxic and hazardous spills

Logic Model Activity



External Influences

Factors outside of your control that may influence outcomes or impacts of your program/project.

Logic Model Template

Resources/ Inputs	Activities	Outputs	Customers	Short Term	Intermediate	Long Term
					<u></u>	
	7			*	<u></u>	
External Influences						

-30-

Region 10 IGAP: Work Plans and Budgets

A work plan and detailed budget for your proposed project are *required elements of your initial draft proposal, and after the negotiations process, of your complete application package*. There is a required format for IGAP work plans and a recommended, but optional, format for budgets. Beginning with proposals submitted for FY11 and later, all work plans must be entered in the GAP Online system.

The negotiations process is the period of time after the initial draft IGAP proposal has been submitted to EPA in which a Project Officer reviews the proposal and recommends revisions to the applicant. The applicant then makes the changes suggested or proposes alternate modifications, and sends the revised proposal back to the Project Officer for review. Negotiations are generally completed with one to three reviews/revisions.

The Work Plan

The work plan is a detailed narrative description of your project, including tasks and how you intend to accomplish them. Your work plan and detailed budget are linked, and the work plan should show how the budgeted items relate to the project tasks--how they will be used, and why they are needed.

When Developing Your Work Plan Do:

- Write clear and concise work plan elements.
- Break down objectives into logical, consecutive, clearly stated tasks or steps.
- Identify how each task will be accomplished.
- List expected work products, (deliverables or outputs) for each component (objective) and commitment (task).
- Link personnel, equipment, and other budget costs from the detailed budget to the components/commitments listed in the work plan.
- Provide estimated time frames to accomplish the tasks

When Developing Your Work Plan *Avoid*:

- Vaguely defined goals, objectives, tasks, time frames, and outcomes ("ongoing").
- Leaving specific outputs/deliverables unidentified.
- Omitting time frames or resources for specific objectives or tasks.
- Duplicating previous tasks.

IV. Region 10 Grants: 40 CFR Part 35 A & B: Work Plan Requirements

At a minimum, work plans must contain the following:

- 1. Detailed description of work plan components to be funded under the grant;
- 2. Estimated Component Cost: estimated funding amounts for each work plan component that must add up to the total request for your proposal. Make an informed estimate of the cost you believe will be attached to the work. You can do this by getting quotes from vendors, researching the Internet, or basing them on historical costs. No matter how you do it, be <u>sure</u> that the total of all your component costs equals your total IGAP request.
- 3. Estimated Component Work Years: includes the hours that all staff members will spend working on a particular component; it is expressed as a whole or decimal number (1.75; 2; .85; etc.). (Use of the optional Adobe detailed budget template is strongly encouraged. It calculates Total Work Years for you, which you can then divide among work plan components as Estimated Component Work Years.)
- 4. Work plan commitments for each work plan component and time frames for their accomplishment;
- 5. Performance evaluation process and reporting schedule in accordance with Part 35 (standard language; see following Narrative Introduction);
- 6. Roles and responsibilities of recipient and EPA in carrying out work plan commitments (standard language; see following Narrative Introduction).

Creating an IGAP Proposal:

- 1. Before you start writing, conduct an informal community environmental inventory/needs assessment and identify priorities. Talk with Council members to identify environmental issues to address.
- 2. Identification of resources: Internal What resources does the Tribe already have to address this problem? External Who else is willing to help?
- 3. Carefully read the funding announcement.
- 4. Call the point of contact to discuss your project's fit with the requirements.
- 5. If you plan on using contractors, begin requesting information about costs and typical rates for the work you are considering.
- 6. IGAP proposals should include a narrative introduction, work plan, and detailed budget.

Narrative Introduction Contents of Narrative

- Description of the Tribe
- Tribe's administrative capacity
- Tribe's history with the IGAP program.
- Background information on the environmental issues to be addressed by this work plan.
- Tribe's long term environmental goals that will be supported in this work plan.
- Standard language regarding the Joint Performance Evaluation Process and EPA Roles and Responsibilities

Tribal Description

- Where is it located?
- Cultural groups?
- How many members?
- Community population?

It is helpful to say which community the Tribe lives in and where the Tribal lands are, especially if the Tribe is not residing in traditional homelands.

Administrative Capacity

- Is your Tribe a compacting or self governance Tribe?
- Does it have regular audits?
- What other programs are administered?
- How many employees?
- Current financial policies and procedures?
- Current personnel policies and procedures?
- Past issues?

History with the IGAP Program

- How long has the Tribe had IGAP grants?
- Accomplishments with IGAP?
- Some goals not achieved?
- Past issues?
- Changes or corrective actions.

Background Information on Environmental Issues

Background information may include a narrative description of the risks to human health and the environment to be addressed by the applicant, and their relation to any environmental assessment or strategy efforts conducted to date.

- Describe the problems to be addressed with this work plan.
- What has been tried in the past?
- Who are your partners?
- Make sure you update your description to match this year's work plan.

Tribe's Long Term Environmental Goals

- Determine and state the change that the Tribe is working toward.
- This is a long term *outcome*: The result, effect, or consequence that will occur from carrying out an environmental program or activity that is related to an environmental or programmatic goal or objective. Outcomes may be environmental, behavioral, or health related or programmatic in nature, must be quantitative, and **may not necessarily be achievable within an assistance agreement funding period**. (From 2006 IGAP Guidance)

Ingredients of an IGAP Work Plan



Components

Definition: a constituent part: **INGREDIENT** <an important *component* of the program> <stereo *components*>

 Work plan components are the objectives, or planned accomplishments, of your proposal. For example, your work plan may contain a solid waste component, a water quality component, and an administrative component.

Outcomes

• **Definition:** The result, effect, or consequence that will occur from carrying out an environmental program or activity that is related to an environmental or programmatic goal or objective. Outcomes may be environmental, behavioral, health related or programmatic in nature, must be quantitative, and may not necessarily be achievable within an assistance agreement funding period. (*From 2006 IGAP Guidance*)

Examples of Long Term Environmental Outcomes

- Reduce habitat and human health impacts of water borne pollutants by 50%.
- Mine's wastewater discharge regulated to reduce adverse impacts on subsistence fisheries by 95%.
- Human and environmental health improved through 45% reduction of solid waste entering the landfill.

Work Plan Outputs

- Also known as deliverables.
- **Definition**: An environmental activity, effort, and/or associated work products related to an environmental goal or objective that will be produced or provided over a period of time or by a specified date.
- Outputs may be quantitative or qualitative but must be measurable during an assistance agreement funding period. (From 2006 IGAP Guidance)

Examples of outputs

- Meeting minutes
- Information summaries
- Presentation materials
- Final plans
- Quarterly reports
- Financial reports
- Policies and procedures
- Pounds of cans or numbers of batteries collected
- · Photos of alternative energy project submitted to Project Officer
- Report on annual spring cleanup that includes number of bags collected and people participating.
- New Tribal environmental codes and ordinances
- Water sampling test results
- Newsletters
- Quality Assurance Project Plan (QAPP)

Work Plan Commitments

- Formally known as tasks or activities, now called commitments
- An easy way to remember this is to ask: What is the Tribe committing to do?

• Adding who is responsible for each work plan commitment produces a better work plan. At a minimum, you should list the personnel that will be working on each component.

<u>A Primary Capacity Area must be selected for each work plan</u> commitment

Required capacity areas choices:

- Legal
- Enforcement
- Technical
- Communication
- Administrative
- Solid and hazardous waste implementation

Quality Assurance Project Plans (QAPPs)

- **A QAPP is required** before any sampling is done with IGAP funds.
- Be sure to include QAPP development in your work plan, and give a target completion date.
- If a completion date is not indicated, the QAPP must be submitted 30 days after the beginning of the project period.
- Costs for sampling done before a QAPP was approved may be disallowed, so make QAPP development and approval a priority in your work plan.
- QAPPS are reviewed and approved by EPA's Quality
 Assurance unit. Be sure to involve your Project Officer in early
 reviews.

<u>Special Projects</u> (Note: a work plan and budget separate from the base funding work plan and budget are required.)

Supplemental Projects for Unmet Needs — Individual tribes and tribal consortia that would like to request funding for special tasks (e.g., to conduct an initial water resources assessment, or implement solid and hazardous waste programs, including cleanup activities) or special equipment purchases (e.g., video conferencing equipment, solid waste/recycling program equipment, or vehicle purchase) may submit a supplemental request to their base work plans and budgets. If sufficient GAP funds are available after base needs have been met, EPA may fund additional priority tasks or equipment purchases. GAP review criteria (see Section VII) will be used to determine priorities for funding supplemental activities or purchases. Additionally, applicants MUST clearly articulate the need for the project, describe how the project will address the need, and demonstrate how the tribe will complete the project within the fiscal year.

Requests for supplemental projects for unmet needs are generally limited to \$75,000. More than one special project may be considered if funds allow. A separate work plan and budget must be developed for each supplemental project funding component. Optional components must be ranked in order of importance. Requests for supplemental funding are limited to a specific project year (i.e., no multi-year proposals). Proposed project activities must include a description of expected human health and environmental benefits.

The Alaska Peer Assistance Network can be an option for supplemental project funding in Alaska as a separate cooperative agreement. Alaska GAP grantees (i.e., tribes or consortia) can propose assistance to other tribes related to improving GAP grant compliance and performance. All peer assistance work must be submitted as a proposal under a cooperative agreement.

The Peer Assistance Network provides grants management, administrative and/or financial management assistance to Tribes who either have an IGAP grant or those who seek to develop the capacity to successfully administer an IGAP grant. These efforts are provided by other Tribes or Consortia as peers. Contact your IGAP project officer for assistance with determining which Peer Assistance Provider to call.

Assistance may be provided through group regional training sessions in villages and hub communities, one-on-one assistance in villages or through distance methods (over the phone, email, webinars, or other means). These services may be provided to Tribal environmental staff funded by IGAP, as well as administrators, bookkeepers, and/or Council members who may benefit from improved understanding of the requirements of the IGAP program.

Typically these services are provided through EPA Cooperative Agreements (with greater EPA involvement than grants). Tribes and Tribal consortia may apply for an Alaska Peer Assistance Cooperative Agreement for a maximum of \$75,000, or may request an additional component to their base funds work plan as a "special project that benefits multiple Tribes".

Additional Funding Opportunities in the IGAP Program

1. Coordination of Regional Tribal Operations Committee (RTOC)

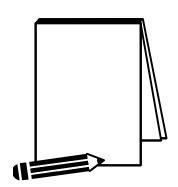
Region 10 will provide funding to a Tribe to coordinate RTOC activities that will help develop Tribal capacity. In the past, funding has been awarded to the Tribe whose staff serves as the RTOC Tribal Co-Chair. If a Tribe is

interested in submitting a proposal to coordinate the RTOC grant, the proposal may be submitted in addition to a base funding request.

2. Tribal Environmental Summit

Tribes and Tribal consortia may express interest in co-sponsoring the biannual Tribal Environmental Summit (formerly the Tribal Leader's Summit) with EPA Region 10 by submitting an abstract (a one-page description of proposed tasks and their costs). Eligibility to host the Summit rotates annually among the four Region 10 states. Approximately 300-400 attendees are expected for each Summit, requiring sizable conference facilities and lodging availability. As a policy, Tribally owned facilities are preferred.

Review examples of a narrative introduction, a work plan, and a budget on the following pages. Please note that text in italics includes instructions or indicates information that needs to be filled in. It is informational only.



Indian Environmental General Assistance Program (IGAP) Proposal

Project/Budget Period: October 1, ______ to September 30, _____ (for multi-year proposals, include entire period up to a maximum of 4 years)

from
Full Legal Name of Tribe
DUNS #
Mailing Address
Telephone #
Fax #
Date Submitted
Date of Revision

I. INTRODUCTION

A. BACKGROUND

Provide a narrative discussion including, but not limited to, the following:

- Status as a Federally Recognized Tribe
- Tribe's history, culture, economy, demographics (number of people, % native), etc.
- Geographic location, environmental resources, subsistence resources
- How long have you received IGAP funding

B. ENVIRONMENTAL ISSUES

Provide a narrative discussion including, but not limited to, the following:

- Environmental and public health concerns/issues facing the community. Examples may include solid waste, hazardous waste, water/soil contamination, water and air quality concerns, etc.
- Describe the problems to be addressed with this work plan
- What has been tried in the past?
- Who are your partners?

C. MANAGEMENT AND FINANCIAL CAPABILITIES

Provide a narrative discussion including, but not limited to, the following:

- Ability to manage administrative and financial aspects of grants
- Policies and procedures are developed?
- Types and number of grants managed, including IGAP
- Timeliness and completeness of reports and outputs
- Types of formal and informal audits and findings from these audits
 For negative findings, what was the issue and what steps were taken to resolve the issue

D. ACCOMPLISHMENTS

Provide a narrative discussion including, but not limited to, the following:

- If currently or previously received IGAP funding, discuss your project and community accomplishments. Specify dates of funding.
- If currently or previously received funding from other EPA, Federal/State agency programs, and/or private/non-profit organizations, discuss your project and community accomplishments. Specify dates and sources of funding.

II. WORK PLAN COMPONENTS

Provide a general narrative summary of your work plan components that includes, but is not limited to, the following information:

- *Identify whether the work plan component is for multi-year funding.*
- Identify the number of work plan components for each year.
- *Include the following standard language:*

The [Insert your Tribe's name] has developed this work plan proposal under the statutory authority provide by the Indian Environmental General Assistance Program Act of 1992, and is consistent with EPA's 2006 – 2011 Strategic Plan under Goal 5, Compliance and Environmental Stewardship, Objective 5.3, Improve Human Health and the Environment in Indian Country.

III. JOINT PERFORMANCE EVALUATION PROCESS

Include the following standard language:

Within 30 days of the end of each fiscal quarter, Environmental Program staff will submit a performance report detailing the accomplishments toward the

completion of work plan commitments, discussing the work performed for all work plan components, and identifying any existing problem areas that could affect or delay project completion. If the EPA Project Officer, after reviewing the report, finds that the recipient has not made sufficient progress under the work plan, EPA and *Insert your Tribe's Name* Council will negotiate a resolution that addresses the issues. The evaluation process will help to ensure that the grant is being administered properly and that work conducted under the grant is in accordance with approved work plan.

IV. EPA ROLES AND RESPONSIBILITIES

Include the following standard language:

The EPA will have no substantial involvement in the accomplishment of work plan commitments. EPA will monitor progress and provide technical assistance as needed to ensure project completion. (If EPA will be involved in completing any portion of the work plan commitments, please state as such).

Completing the Word Version Work Plan Template

Following is an example of am IGAP work plan completed for one component, using the required work plan format. When you are working in Microsoft Word, the table's cells, rows, and columns can be copied and pasted as needed for any additional components in your work plan. (Highlight the entire table by clicking the small box that appears above the upper left hand corner of the table, then click Edit followed by Copy—or click the Copy icon—then paste it below the first component.)

Complete your work plan using the format of the following example. Most fields are self explanatory. **Estimated Component Cost** is the amount you predict that it will cost in staff time, supplies, equipment, etc. to complete the tasks of that component. When the estimated costs for all work plan components are added together, the result should be the total amount of your request. For information on calculating **Estimated Component Work Years**, please see page 44.

Region 10 Example Work Plan Format

Tribe: Native Village of Raven

Region: Region 10

Work Plan Period Begin October 1, 2011 End: September 30, 2012

Work Plan Component 3: Solid Waste Management and Pollution Prevention

Primary Capacity Area Developed (check one):

Legal__ Enforcement/Compliance __ Technical__ Communication __ Administrative__ Solid/Hazardous Waste Implementation _X Personnel:

Environmental Outcome:

- Maintain a solid waste program for Tribal offices that removes approximately 20% of solid waste stream through recycling
- Expand existing sustainable pollution prevention actions to other developed and proposed Tribal facilities

Intermediate Outcome (this grant period):

- The existing office recycling and waste reduction program will be expanded to reduce the volume of waste generated for landfill by at least 5%.

Estimated Cost: \$88,000				Estimated Work Years: 0.40		
	COMMITMENTS	PRIMARY CAPACITY AREA	ESTIMATED TASK COST (optional)	DATE	OUTPUTS AND DELIVERABLES	
3.1	Using the best available data from the waste hauling contractor and Tribal records, the recycling rate for the Tribal administrative building will be evaluated on an annual basis.	Technical		9/30/12	Rates of the Tribal recycling program will be included in routine reports to Tribal Council and the IGAP quarterly reports.	
3.2	The Tribe will investigate the feasibility (cost, market availability, collection/transportation infrastructure, staff needs, etc.) of adding additional materials (glass, plastic, and metal containers; fluorescent light bulbs; household batteries; computer equipment; cellular telephones; etc.) to the existing office recycling program.	Technical		4/30/12	Submit report developed for Tribal Council.	
3.3	Environmental staff will keep abreast of recycling and solid waste issues germane to the interests of the Tribe and its members and report on these as needed to the appropriate Tribal personnel.	Technical		9/30/12	Provide update on activities in IGAP quarterly reports.	
3.4	Environmental staff will prepare/disseminate outreach materials (articles in Tribal newspaper, flyers for Tribal member residences, website postings, etc.) on the status of recycling and options such as household hazardous waste collection/disposal available to members in their communities.	Communica tion		9/30/12	Identify outreach materials developed and provide as deliverables. 1. Number of attendees 2. Subjects covered 3. Any questionnaire or assessment results showing before and after outreach community understanding	

Completing the Adobe Budget Template

New template use is HIGHLY encouraged.

- It's in Adobe pdf format
- It saves changes
- It automatically calculates everything
- It's on the Region 10 Tribal Program grants web page
- It's not required

An easy way to remember the required information is:

Who/What...

How much...

How long...

Consider the type of work you're planning and the items/staff you may need:

- Personnel
- Equipment
- Contractors or consultants
- Supplies
- Travel to trainings, and/or
- Indirect costs

Get at least three estimates if purchasing equipment or hiring a contractor or consultant.

Rules of Thumb:

If it's in the budget, it must be in the work plan; and if it's in the work plan, it must be in the budget. Show how the final amount was estimated.

Federal grant recipients cannot profit from the award. IGAP funds can't support other programs or activities.

EPA compares your budget to last year's request. If requesting a duplicate item, explain why it's in the budget again.

Personnel Section

In the template, fill in:

- Position/Title
- **Hourly Rate**
- Number of Hours

Automatically calculates:

- Work Years*
- Subtotal
- Personnel Total
- * Work Years is a measurement of staff time spent on a project activity or activities, compared to one full-time work year of 2080 hours. Total work years are calculated by adding the annual hours for each staff position together then dividing this total by 2080 hours. Total work years should then be divided among work plan components (as Estimated Component Work Years) to add up to this amount.

Fringe

Describe what's included in the Fringe Rate. Insert the percent expressed as a decimal. For instance. 21% is shown as .21

ATTACHMENT E



3. If applicable, provide any additional lump

sum benefits.

Indian General Assistance Program Detailed Budget Worksheet

	Budget Year
isad.	

lame of Grant Recipient:	Date Submitted/Revised:	

Position/Title	Hourly Rate	No. of Hours	Work Years	Subtotal	* Total Work Years
					* Total Work Years is a measurement of staff it spent on a project activities, compared full-time work year of 2 total work years are a by adding the annual heach staff position toge dividing this total by 20 Total work years should divided among work pic components (as Estima Component Work Year up to this amount.
				PERSONNEL TO	OTAL:
GE BENEFITS - Ide be entered on Sta				n and what benefit	s are included. This a
Please provide the				FRINGE TOT	AL:
enefits that are duded in your fringe te. For example, etirement, Health Ca nnual and Sick Leave	re,				

Page 1 of 6

Travel

Describe each trip on the left in the yellow boxes; **spell out** the name of each conference and include:

- Who's attending
- Destination
- Purpose of trip
- Why a Council
 Member or non IGAP paid employee
 is attending.

Then insert the air fare, per diem, lodging, car rental, number of days traveling, number of travelers, and number of trips for this purpose, etc. information.

TRAVEL - Indicate the budgeted travel's purpose, the destination of each trip, the duration of the trip and the number of travelers. Specify the mileage, per diem, and other costs for each type of travel, such as lodging, common carrier transportation, etc. Please explain/justify travel expenses for Tribal Council members. This amount will be entered on Standard Form 424A, Section B, Line 6.c.

Trip A - Purpose, Location, Attendees, Component #		Expense	Cost (or rate/mile)	# of Days (or # of miles)	# of Travelers	# of Trips	Amount
and/or Travel Justification		Round Trip Airfare					
		Lodging					
		Per Diem (Meals & Incidental Expenses)					
		Rental Car per Day (or Mileage Cost)					
			Subtoto	al for Trip A			
	•						
Trip B - Purpose, Location, Attendees, Component #		Expense	Cost (or rate/mile)	# of Days (or # of miles)	# of Travelers	# of Trips	Amount
and/or Travel Justification		Round Trip Airfare					
		Lodging					
		Per Diem (Meals & Incidental Expenses)					
		Rental Car per Day (or Mileage Cost)					
Trip C - Purpose, Location, Attendees, Component#		Expense	Cost (or rate/mile)	# of Days (or # of miles)	# of Travelers	# of Trips	Amount
and/or Travel Justification		Round Trip Airfare					
		Lodging					
		Per Diem (Meals & Incidental Expenses)					
		Rental Car per Day (or Mileage Cost)					
	-						
Trip D - Purpose, Location, Attendees, Component #		Expense	Cost (or rate/mile)	# of Days (or # of miles)	# of Travelers	# of Trips	Amount
and/or Travel Justification		Round Trip Airfare					
		Lodging					
		Per Diem (Meals & Incidental Expenses)					
		Rental Car per Day (or Mileage Cost)					
			Subtote	al for Trip D			
	-				TRAVEL 1	OTAL:	

Page 2 of 6

Equipment & Supplies

EQUIPMENT - Identify each item to be purchased which has an estimated acquisition cost (including shipping) of \$5,000 or more per unit and a useful life of more than one year. Items with a unit cost of less than \$5,000 are deemed to be supplies, pursuant to 40 CFR 31.3. Please provide a detailed justification and identify the appropriate work plan component and/or commitment number, and explain how you arrived at your estimates. If applicable, indicate why it is more cost effective to purchase rather than lease. This amount will be entered on Standard Form 424A, Section B, Line 6.d.

Item Description	Component#	Cost Per Item	How Many?	Amount
Equipment Justification/Cost Estimates (e.g., vendor quotes, catalog searches, etc.):				

EQUIPMENT TOTAL:

SUPPLIES - "Supplies" means all tangible personal property, other than "equipment". The detailed budget should identify categories of supplies to be procured (e.g., laboratory supplies or office supplies), and their cost. <u>If</u> requesting items previously purchased, explain why they are being purchased again. Explain how you arrived at your estimates. This amount will be entered on Standard Form 424A, Section B, Line 6.e.

Item Description	Component#	Cost Per Item or Month	How Many Items or Months?	Amount
Explanation of cost estimates and previous purchases (e.g., based on previous year's expenses, vendor quotes, catalog searches, etc.):				

SUPPLIES TOTAL:

Page 3 of 6

Equipment

- Enter the appropriate description in the Item Description field.
- DO NOT include vendor names.
- Enter the Component number associated with the equipment.
- Cost: (equipment is considered anything \$5,000 or more to acquire (including shipping and fees) with a useful life of at least one year.
- Enter the number of items or months.
- Need to carefully link equipment to the work plan.
- · Must provide an equipment justification with the budget.
- Provide information on the cost of lease versus purchase.

Equipment Justification Example:

ATV is needed to complete solid waste activities. There is no vendor in the community or nearby to rent or lease from. Contacted three potential vendors. The average cost was \$6,349 and shipping was \$800. Total cost with shipping fees is \$7,149.

Supplies

- Enter the supplies in the Item Description field or click item from the drop down menu.
- DO NOT include vendor names.
- Enter the component number or numbers.
- Enter the cost per item or month.
- Enter the number of items or months. Example: \$35/month for office supplies, \$200/one desk.
- Fill in the explanation of cost estimates in the yellow box at the bottom.
- Example: Based on prior year's costs, based on average costs in supply catalog or found on internet sites, etc.).
- Also state if supplies are exclusive to IGAP or shared with other programs.

Contracts & Consultants

CONTRACTUAL - Identify each proposed contract and specify its purpose and estimated cost. Provide information on how the estimates were arrived at. This amount will be entered on Standard Form 424A, Section B, Line 6.f.

NOTE: IGAP applicants should review 40 CFR 31.36 concerning procurement and the need to provide justification for sole source agreements and documentation concerning cost-price analysis for contracts and other agreements.

If your project requires the hiring of consultants (individuals with specialized skills who are paid at an hourly or daily rate), the maximum allowable consultant rate cannot exceed the maximum daily rate for a Level IV of the Executive Schedule, adjusted annually. You may find the annual salary for Level IV of the Executive Schedule on the following Internet site: http://www.opm.gov/oca. Select "Salary and Wages", and select "Executive Schedule". The annual salary is divided by 2087 hours to determine the maximum hourly rate, which is then multiplied by 8 to determine the maximum daily rate.

Contracts						
Item Description	Purpose/Basis for Estimates	Component	Amount			
			<u> </u> 			
			<u> </u>			
Contractual Subtotal						

Consultants							
Consultant A - Purpose, Location, and Component	Expense	Cost (or rate/mile)	# of Hours, Days, or Miles	# of People	# of Trips	Amount	
and/or Commitment #	Hourly or Daily Wage						
	Travel (RT Airfare or Mileage Cost)						
	Lodging						
	Per Diem (Meals & Incidental Expenses)						
Consultant B - Purpose, Location, and Component	Expense	Cost (or rate/mile)	# of Hours, Days, or Miles	# of People	# of Trips	Amount	
and/or Commitment #	Hourly or Daily Wage						
	Travel (RT Airfare or Mileage Cost)						
	Lodging						
	Per Diem (Meals & Incidental Expenses)						
		Subtotalfo	r Consultant B	}			

Page 4 of 6

CONTRACTUAL TOTAL:

Contracts

- Enter type of contract in the Item Description field or click an item from the drop down menu box.
- DO NOT include vendor names.
- Describe the purpose and basis for the estimate.
- Enter the component number the contract will support, then the amount.



Consultants

 Travel, meals, lodging, and incidental expenses are calculated as part of the total request

Example:

Consultant: \$50 x 40 hours = \$2,000 Travel: \$300 RT airfare x 2 trips = \$600.

Lodging: \$85 per day x 2 days x 2 trips = \$340.

Meals & misc.: \$75 per day x 2 days x 2 trips = \$300.

Total = \$3,240

• Describe purpose and provide other requested information in the yellow box.

Other

OTHER - Include items here which do not fit in the other specific budget categories. Give a brief description of the expense and how you arrived at the estimate. *Grantees who own their building are not entitled to reimbursement for rent; however, they may directly charge for utilities and maintenance costs using a cost allocation plan. If an expense is being shared with other programs, please provide the cost share formula. This amount will be entered on Standard Form 424A, Section B, Line 6.h.

Item Description	How Did You Arrive at Cost?	Cost Per Item or Month	How Many Items or Months?	Amount
Building Lease/Rent *				
Explanation of Cost Sharing Formula				
Explanation of Cost Sharing Formula or Cost Allocation				
Explanation of Cost Sharing Formula or Cost Allocation				
Explanation of Cost Sharing Formula or Cost Allocation				I.
Explanation of Cost Sharing Formula or Cost Allocation				I.
Explanation of Cost Sharing Formula or Cost Allocation				
Explanation of Cost Sharing Formula or Cost Allocation				
Explanation of Cost Sharing Formula or Cost Allocation				
Explanation of Cost Sharing Formula or Cost Allocation				I.
Explanation of Cost Sharing Formula or Cost Allocation				
Explanation of Cost Sharing Formula or Cost Allocation				
		ОТІ	HER TOTAL:	

Page 5 of 6

This includes rent or upkeep/maintenance costs. If the Tribe owns the building the IGAP program is in, the program cannot be charged "rent" but may charge a "fair share" amount (total cost evenly divided between all programs using the building) of building upkeep/maintenance, utilities, office equipment, space/amenities, etc.

Also, items like supplies, utilities, etc. are either dedicated exclusively to the IGAP program or they're shared. If shared, state the number of programs sharing the cost and show the portion of costs that IGAP will cover.

Example Explanations Under Other:

Heating oil: The cost of heating oil is equally shared between four programs. Expect our cost to be \$3,600. 200 gallons divided by 4 programs = 50 gallons per month X \$6.00 per gallon X 12 months = \$3,600.

Office space costs = \$200 per month. This amount covers the cost of heating fuel: \$800 per month, shared equally between four programs = \$200.

Insurance: \$2,000 per year/12 months/ four programs = \$42 per month.

Electricity: \$400 per month/four programs = \$100.

Building maintenance: \$29 per hour @ 8 hours per month shared between four programs = \$58.

Note: Other methods for determining the above fair share costs may be used, such as square feet of office space a program occupies or number of employees employed by a program.

Indirect Costs

		eted, indicate the approved rate and base. The base amount is usual passthrough funds. Passthrough funds are normally defined as					
major subcontracts, payments to participants, stipends to eligible recipients, and subgrants, all of which normally require minimal administrative effort. However, please refer to your negotiated agreement for specific guidance. If you are choosing to charge less than the approved rate, you may type in the applicable amount in the Indirect							
Total box. This amount will be entered on Standard Form 424A, Section B, Line 6.j.							
NOTE: If you plan to propose indirect costs as part of your grant project budget, you must have on file with the Region 10 Grants Administration Unit: (a) A current approved Indirect Cost Rate Agreement; or (b) Documentation that a current indirect cost rate proposal has been submitted to the Department of Interior's National Business Center. This documentation must indicate the requested rate. You may use either the approved							
	i your proposed budget. Pleas ii your proposal will be disall	se provide a copy with your application. If you can provide neithe lowed.					
Approved or Proposed Indirect Cost Rate (Enter as	Base Amount:	INDIRECT TOTAL:					
a decimal):							
		TOTAL BUDGET:					
		TOTAL BODGETT					
		Page 6 of 6					

If you have an approved Indirect Cost Rate agreement, please submit a copy of it with your application.

- Enter the Indirect Cost Rate expressed as a decimal. 22% should be expressed as
- Enter the Base Amount or total the Direct Costs. It will calculate the Total Indirect and the Total Budget.

Finally....

- Double and triple check your budget!!!
- Fill out the SF 424a form.

All the numbers in the budget must match the 424a.



Forms - Completing the Application Package

Required Application Forms When Beginning a New Grant

- Application for Federal Assistance (SF-424)
- Budget Information (SF-424A)
- Assurances, Non-construction Programs Form (SF-424B)
- Pre-Award Compliance Review Report (EPA Form 4700-4)
- Certification Regarding Lobbying

Required Application Forms for Continuing Grants

- Application for Federal Assistance (SF-424)
- Budget Information (SF-424A)
- Certification Regarding Lobbying

<u>Optional Application Forms – All Grant Applicants</u>

Key Contacts

SF 424, Application for Federal Domestic Assistance

- Fill out completely and accurately.
- A few boxes are not applicable to IGAP (#3 7, #12 13)
- Refer to instructions.
- An authorized representative (or designee) must sign the form (First Chief, Tribal Council President, Tribal Administrator, etc...).

OMB Number: 4040-0004 Expiration Date: 01/31/2009

Application for Federal Assistance SF-424 Version 02							
*1. Type of Submission:	*2. Type of Applicati	ion * If Revision, select appropriate letter(s)					
☐ Preapplication	☐ New						
☐ Application	☐ Continuation	*Other (Specify)					
☐ Changed/Corrected Application	Revision						
3. Date Received: 4.	Applicant Identifier:						
5a. Federal Entity Identifier:		*5b. Federal Award Identifier:					
State Use Only:							
6. Date Received by State:	7. State Ap	oplication Identifier:					
8. APPLICANT INFORMATION:							
*a. Legal Name:							
*b. Employer/Taxpayer Identification N	Number (EIN/TIN):	*c. Organizational DUNS:					
d. Address:							
*Street 1:							
Street 2:							
*City:							
County:							
*State:							
Province:							
*Country:							
*Zip / Postal Code							

e. Organizational Unit:	
Department Name:	Division Name:
f. Name and contact information of person to be contact	ted on matters involving this application:
Prefix: *First Name:	
Middle Name:	
*Last Name:	
Suffix:	
Title:	
Organizational Affiliation:	
*Telephone Number:	Fax Number:
*Email:	
	OMB Number: 4040-0004
	Expiration Date: 01/31/2009
Application for Federal Assistance SF-424	Version 02
*9. Type of Applicant 1: Select Applicant Type:	
Type of Applicant 2: Select Applicant Type:	
3.	
Type of Applicant 3: Select Applicant Type:	
*Other (Specify)	
*10 Name of Federal Agency:	
11. Catalog of Federal Domestic Assistance Number:	
CFDA Title:	
*12 Funding Opportunity Number:	

*Title:		
13. Competition Identification Number:		
Title:		
14. Areas Affected by Project (Cities, Counties, States, etc.):		
*15. Descriptive Title of Applicant's Project:		
		OMB Number: 4040-0004 Expiration Date: 01/31/2009
Application for Federal Assistance SF-424		Version 02
16. Congressional Districts Of:		
*a. Applicant:	*b. Program/Project:	
17. Proposed Project:		
*a. Start Date:	*b. End Date:	
18. Estimated Funding (\$):		
*a. Federal		
*b. Applicant *c. State		
*d. Local		

*e. Other					
*f. Program Income					
*g. TOTAL					
*19. Is Application Subject to Review By State Under Executive Orde	12372 Process?				
a. This application was made available to the State under the Executive	e Order 12372 Proce	ess for review on			
☐ 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					
*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", pro	/ide explanation.)				
☐ Yes ☐ No					
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)					
□ ** I AGREE					
** The list of certifications and assurances, or an internet site where you m agency specific instructions	ay obtain this list, is o	contained in the announcement or			
Authorized Representative:					
Prefix: *First Name:					
Middle News					
Middle Name:					
*Last Name:					
Suffix:					
*Title:					
*Telephone Number: Fax Number:					
* Email:					
*Signature of Authorized Representative: *Date Signed:					

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Standard Form 424 (Revised 2005) Prescribed by OMB Circular A-102

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

INSTRUCTIONS FOR THE SF-424

Public reporting burden for this collection of information is estimated to average 60 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0043), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

This is a standard form (including the continuation sheet) required for use as a cover sheet for submission of preapplications and applications and related information under discretionary programs. Some of the items are required and some are optional at the discretion of the applicant or the Federal agency (agency). Required items are identified with an asterisk on the form and are specified in the instructions below. In addition to the instructions provided below, applicants must consult agency instructions to determine specific requirements.

Item	Entry:	Item	Entry:	
1.	Type of Submission: (Required): Select one type of submission in accordance with agency instructions. Preapplication Application	10.	Name Of Federal Agency: (Required) Enter the name of the Federal agency from which assistance is being requested with this application.	
	 Changed/Corrected Application – If requested by the agency, check if this submission is to change or correct a previously submitted application. Unless requested by the agency, applicants may not use this to submit changes after the closing date. 	11.	Catalog Of Federal Domestic Assistance Number/Title: Enter the Catalog of Federal Domestic Assistance number and title of the program under which assistance is requested, as found in the program announcement, if applicable.	
2.	Type of Application: (Required) Select one type of application in accordance with agency instructions. New – An application that is being submitted to an agency for the first time.	12.	Funding Opportunity Number/Title: (Required) Enter the Funding Opportunity Number and title of the opportunity under which assistance is requested, as found in the program announcement.	
	Continuation - An extension for an additional funding/budget period for a project with a projected completion date. This can include renewals. Revision - Any change in the Federal Government's financial obligation or contingent liability from an existing obligation. If a	13.	Competition Identification Number/Title: Enter the Competition Identification Number and title of the competition under which assistance is requested, if applicable.	
	revision, enter the appropriate letter(s). More than one may be selected. If "Other" is selected, please specify in text box provided. A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration E. Other (specify)	14.	Areas Affected By Project: List the areas or entities using the categories (e.g., cities, counties, states, etc.) specified in agency instructions. Use the continuation sheet to enter additional areas, if needed.	
3.	Date Received: Leave this field blank. This date will be assigned by the Federal agency.	15.	Descriptive Title of Applicant's Project: (Required) Enter a brief descriptive title of the project. If appropriate, attach a map showing project location (e.g., construction or real	
4.	Applicant Identifier: Enter the entity identifier assigned by the Federal agency, if any, or applicant's control number, if applicable.		property projects). For preapplications, attach a summary description of the project.	
5a 5b.	Federal Entity Identifier: Enter the number assigned to your organization by the Federal Agency, if any. Federal Award Identifier: For new applications leave blank. For a continuation or revision to an existing award, enter the previously assigned Federal award identifier number. If a changed/corrected application, enter the Federal Identifier in accordance with agency instructions.	16.	Congressional Districts Of: (Required) 16a. Enter the applicant's Congressional District, and 16b. Enter all District(s affected by the program or project. Enter in the format: 2 characters State Abbreviation – 3 characters District Number, e.g., CA-005 for California 5 th district, CA-012 for California 12 district, NC-103 for North Carolina's 103 th district. If all congressional districts in a state are affected, enter	
6.	Date Received by State: Leave this field blank. This date will be assigned by the State, if applicable.		"all" for the district number, e.g., MD-all for all congressional districts in Maryland.	
7.	State Application Identifier: Leave this field blank. This identifier will be assigned by the State, if applicable.		 If nationwide, i.e. all districts within all states are affected, enter US-all. If the program/project is outside the US, enter 00-000. 	
8.	Applicant Information: Enter the following in accordance with agency instructions:			
	a. Legal Name: (Required): Enter the legal name of applicant that will undertake the assistance activity. This is the name that the organization has registered with the Central Contractor Registry. Information on registering with CCR may be obtained by visiting the Grants.gov website. b. Employer/Taxpayer Number (EIN/TIN): (Required): Enter the	17.	Proposed Project Start and End Dates: (Required) Enter the proposed start date and end date of the project.	
	Employer or Taxpayer Identification Number (EIN or TIN) as assigned by the Internal Revenue Service. If your organization is not in the US, enter 44-4444444. c. Organizational DUNS: (Required) Enter the organization's DUNS or DUNS+4 number received from Dun and Bradstreet. Information on obtaining a DUNS number may be obtained by visiting the Grants.gov website. d. Address: Enter the complete address as follows: Street address (Line 1 required), City (Required), County, State (Required, if country is US),		or to be contributed during the first funding/budget period by each contributor. Value of in-kind contributions should be included on appropriate lines, as applicable. If the action will result in a dollar change to an existing award, indicate only the amount of the change. For decreases, enclose the amounts in parentheses.	
	Province, Country (Required), Country, State (Required, if country is US). e. Organizational Unit: Enter the name of the primary organizational unit (and department or division, if applicable) that will undertake the	19.	Is Application Subject to Review by State Under Executive Order 12372 Process? Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the	

assistance activity, if applicable. f. Name and contact information of matters involving this application: required), organizational affiliation (if than the applicant organization), telep number, and email address (Required matters related to this application.	Enter the name (First and last name affiliated with an organization other phone number (Required), fax	20.	State intergovernmental review process. Select the appropriate box. If "a." is selected, enter the date the application was submitted to the State Is the Applicant Delinquent on any Federal Debt? (Required) Select the appropriate box. This question applies to the applicant organization, not the person who signs as the authorized representative. Categories of debt include delinquent audit disallowances, loans and taxes. If yes, include an explanation on the continuation sheet.
9. Type of Applicant: (Required) Select up to three applicant type(s) in instructions. A. State Government B. County Government C. City or Township Government D. Special District Government E. Regional Organization F. U.S. Territory or Possession G. Independent School District H. Public/State Controlled Institution of Higher Education I. Indian/Native American Tribal Government (Federally Recognized) J. Indian/Native American Tribal Government (Other than Federally Recognized) K. Indian/Native American Tribally Designated Organization L. Public/Indian Housing Authority	M. Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education) N. Nonprofit without 501C3 IRS Status (Other than Institution of Higher Education) O. Private Institution of Higher Education P. Individual Q. For-Profit Organization (Other than Small Business) R. Small Business S. Hispanic-serving Institution T. Historically Black Colleges and Universities (HBCUs) U. Tribally Controlled Colleges and Universities (TCCUs) V. Alaska Native and Native Hawaiian Serving Institutions W. Non-domestic (non-US) Entity X. Other (specify)	21.	Authorized Representative: (Required) To be signed and dated by the authorized representative of the applicant organization. Enter the name (First and last name required) title (Required), telephone number (Required), fax number, and email address (Required) of the person authorized to sign for the applicant. A copy of the governing body's authorization for you to sign this application as the official representative must be on file in the applicant's office. (Certain Federal agencies may require that this authorization be submitted as part of the application.)

SF 424a - Budget Information OMB Approval No. 0348-0044

BUDGET INFORMATION - Non-Construction Programs

			SEC	CTION A -	BUDGET SUMM	ARY					
Grant Program	Catalog of Federal	Estimated Unobligated Funds		New or Revised Budget							
Function or Activity (a)	Domestic Assistance Number (b)		Federal (c)	Non-Federal (d)		Federal (e)		Non-Federal (f)		Total (g)	
1.		\$		\$		\$		\$		\$	0.00
2.											0.00
3.											0.00
4. Totals		\$	0.00	\$	0.00	\$	0.00	\$	0.00	\$	0.00
			SEC	TION B -	BUDGET CATEGO	RIES					
6. Object Class Categori	es		GRANT PROGRAM, FUNCTION OR ACTIVITY								Total
				(2)		(3)		(4)			(5)
a. Personnel											0.00
b. Fringe Benefits											0.00
c. Travel											0.00
d. Equipment											0.00
e. Supplies											0.00
f. Contractual											0.00
g. Construction											0.00
h. Other	h. Other					0.00					
i. Total Direct Charge	es (sum of 6a-6h)		0.00		0.00		0.00		0.00		0.00
j. Indirect Charges											0.00
k. TOTALS (sum of 6i	and 6j)	\$	0.00	\$	0.00	\$	0.00	\$	0.00	\$	0.00
7. Program Income		\$		\$		\$		\$		\$	0.00

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Standard Form 424A (Rev 7-2009)

SECTION C - NON-FEDERAL RESOURCES									
(a) Grant Program	(b) Ap	plicant	(c) State		(d) Other Sources		(e) TOTALS		
8.								\$	0.00
9.								\$	0.00
10.								\$	0.00
11.								\$	0.00
12. Total (SUM OF LINES 8-11)								\$	0.00
	SECTION D - FORECASTED CASH NEEDS								
13. Federal	Total for 1 st Year	1 st Qı	ıarter	2 nd	Quarter	3	rd Quarter	4 th Quarter	
	\$ 0.00	\$		\$		\$		\$	
14. Non-Federal	0.00								
15. TOTAL (sum of lines 13 and 14)	\$ 0.00	\$	0.00	\$	0.00	\$	0.00	\$	0.00
SECT	ION E - BUDGET ESTIMATES	OF FEDERAL I	UNDS NEEDI	ED FOR	BALANCE OF	THE PRO	DJECT		
(a) Grant Program					FUTURE FU	INDING P	ERIODS (years)		
	(b)	(b) First (c) Second (d) Third			(d) Third	(e) Fourth			
16.		\$		\$		\$		\$	
17.									
18.									
19.									
20. TOTAL (sum of lines 16-19)			0.00	\$	0.00	\$	0.00	\$	0.00
SECTION F - OTHER BUDGET INFORMATION									
21. Direct Charges: 22. Indirect Charges:									
23. Remarks:									

INSTRUCTIONS FOR THE SF-424A

Public reporting burden for this collection of information is estimated to average 180 minutes per response, including time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comment regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0044), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

General Instructions

This form is designed so that application can be made for funds from one or more grant programs. In preparing the budget, adhere to any existing Federal grantor agency guidelines which prescribe how and whether budgeted amounts should be separately shown for different functions or activities within the program. For some programs, grantor agencies may require budgets to be separately shown by function or activity. For other programs, grantor agencies may require a breakdown by function or activity. Sections A, B, C, and D should include budget estimates for the whole project except when applying for assistance which requires Federal authorization in annual or other funding period increments. In the latter case, Sections A, B, C, and D should provide the budget for the first budget period (usually a year) and Section E should present the need for Federal assistance in the subsequent budget periods. All applications should contain a breakdown by the object class categories shown in Lines a-k of Section B.

Section A. Budget Summary Lines 1-4 Columns (a) and (b)

For applications pertaining to a single Federal grant program (Federal Domestic Assistance Catalog number) and not requiring a functional or activity breakdown, enter on Line 1 under Column (a) the Catalog program title and the Catalog number in Column (b).

For applications pertaining to a single program requiring budget amounts by multiple functions or activities, enter the name of each activity or function on each line in Column (a), and enter the Catalog number in Column (b). For applications pertaining to multiple programs where none of the programs require a breakdown by function or activity, enter the Catalog program title on each line in Column (a) and the respective Catalog number on each line in Column (b).

For applications pertaining to multiple programs where one or more programs require a breakdown by function or activity, prepare a separate sheet for each program requiring the breakdown. Additional sheets should be used when one form does not provide adequate space for all breakdown of data required. However, when more than one sheet is used, the first page should provide the summary totals by programs.

Lines 1-4, Columns (c) through (g)

For new applications, leave Column (c) and (d) blank. For each line entry in Columns (a) and (b), enter in Columns (e), (f), and (g) the appropriate amounts of funds needed to support the project for the first funding period (usually a year).

For continuing grant program applications, submit these forms before the end of each funding period as required by the grantor agency. Enter in Columns (c) and (d) the estimated amounts of funds which will remain unobligated at the end of the grant funding period only if the Federal grantor agency instructions provide for this. Otherwise, leave these columns blank. Enter in columns (e) and (f) the amounts of funds needed for the upcoming period. The amount(s) in Column (g) should be the sum of amounts in Columns (e) and (f).

For supplemental grants and changes to existing grants, do not use Columns (c) and (d). Enter in Column (e) the amount of the increase or decrease of Federal funds and enter in Column (f) the amount of the increase or decrease of non-Federal funds. In Column (g) enter the new total budgeted amount (Federal and non-Federal) which includes the total previous authorized budgeted amounts plus or minus, as appropriate, the amounts shown in Columns (e) and (f). The amount(s) in Column (g) should not equal the sum of amounts in Columns (e) and (f).

Line 5 - Show the totals for all columns used.

Section B Budget Categories

In the column headings (1) through (4), enter the titles of the same programs, functions, and activities shown on Lines 1-4, Column (a), Section A. When additional sheets are prepared for Section A, provide similar column headings on each sheet. For each program, function or activity, fill in the total requirements for funds (both Federal and non-Federal) by object class categories.

Line 6a-i - Show the totals of Lines 6a to 6h in each column.

Line 6j - Show the amount of indirect cost.

Line 6k - Enter the total of amounts on Lines 6i and 6j. For all applications for new grants and continuation grants the total amount in column (5), Line 6k, should be the same as the total amount shown in Section A, Column (g), Line 6. For supplemental grants and changes to grants, the total amount of the increase or decrease as shown in Columns (1)-(4), Line 6k should be the same as the sum of the amounts in Section A, Columns (e) and (f) on Line 5.

Line 7 - Enter the estimated amount of income, if any, expected to be generated from this project. Do not add or subtract this amount from the total project amount, Show under the program

INSTRUCTIONS FOR THE SF-424A (continued)

narrative statement the nature and source of income. The estimated amount of program income may be considered by the Federal grantor agency in determining the total amount of the grant.

Section C. Non-Federal Resources

Lines 8-11 Enter amounts of non-Federal resources that will be used on the grant. If in-kind contributions are included, provide a brief explanation on a separate sheet.

Column (a) - Enter the program titles identical to Column (a), Section A. A breakdown by function or activity is not necessary.

Column (b) - Enter the contributions to be made by the applicant.

Column (c) - Enter the amount of the State's cash and in-kind contribution if the applicant is not a State or State agency. Applicants which are a State or State agencies should leave this column blank.

Column (d) - Enter the amount of cash and in-kind contributions to be made from all other sources.

Column (e) - Enter totals of Columns (b), (c), and (d).

Line 12 - Enter the total for each of Columns (b)-(e). The amount in Column (e) should be equal to the amount on Line 5, Column (f), Section A.

Section D. Forecasted Cash Needs

Line 13 - Enter the amount of cash needed by quarter from the grantor agency during the first year.

Line 14 - Enter the amount of cash from all other sources needed by quarter during the first year.

Line 15 - Enter the totals of amounts on Lines 13 and 14.

Section E. Budget Estimates of Federal Funds Needed for Balance of the Project

Lines 16-19 - Enter in Column (a) the same grant program titles shown in Column (a), Section A. A breakdown by function or activity is not necessary. For new applications and continuation grant applications, enter in the proper columns amounts of Federal funds which will be needed to complete the program or project over the succeeding funding periods (usually in years). This section need not be completed for revisions (amendments, changes, or supplements) to funds for the current year of existing grants.

If more than four lines are needed to list the program titles, submit additional schedules as necessary.

Line 20 - Enter the total for each of the Columns (b)-(e). When additional schedules are prepared for this Section, annotate accordingly and show the overall totals on this line.

Section F. Other Budget Information

Line 21 - Use this space to explain amounts for individual direct object class cost categories that may appear to be out of the ordinary or to explain the details as required by the Federal grantor agency.

Line 22 - Enter the type of indirect rate (provisional, predetermined, final or fixed) that will be in effect during the funding period, the estimated amount of the base to which the rate is applied, and the total indirect expense.

Line 23 - Provide any other explanations or comments deemed necessary.

SF-424A (Rev 7-2009) Page 4

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact

the

awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional

assurances.

If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- 2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- 4. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- 5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), which prohibits discrimination on the

- basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101-6107), which prohibits discrimination of the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

Previous Edition Usable

Standard Form 424B (Rev 7-2009) Prescribed by OMB Circular A-102

- 9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. 276a to 276a-7), the Copeland Act (40 U.S.C. 276c and 18 U.S.C. 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. 327-333), regarding labor standards for federally-assisted construction subagreement.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in flood plains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

- 12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271 et seq.) Related to protecting components or potential components of the national wild and scenic rivers system.
- 13. Will assist the awarding agency in assuring compliance will Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. 2131 et seq.) Pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.) Which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- 18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE	
APPLICANT ORGANIZATION		DATE SUBMITTED

Standard Form 424B (Rev 7-2009) Back

Certification Regarding Lobbying (required for new and continuing grants)



CERTIFICATION REGARDING LOBBYING

CERTIFICATION FOR CONTRACTS, GRANTS, LOANS, AND COOPERATIVE AGREEMENTS

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including sub-contracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31 U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Typed Name & Titloof Authorized Representative		
Signature o f Authorized Representative	Date	

EPA Form 4700-4: Preaward Compliance Review (new applications only)

FORM

Approved By OMB: No. 2030-0020 Expires 04-30-2012

	All Applicants and Re	d Compliance Review Report for ecipients Requesting EPA Financial Assistance				
I.	Applicant/Recipient (Name, Address, State, Zip Co	ructions on other side before completing form.	DUNS No.			
	apparent receiped (rune, runess, one, ap co	·	DUNS NO.			
П.	Is the applicant currently receiving EPA assistance					
111.	List all civil rights lawsuits and administrative com color, national origin, sex, age, or disability. (Do n instructions on reverse side.)	plaints pending against the applicant/recipient that allege disc oot include employment complaints not covered by 40 C.F.R. 1	rimination based on race, Parts 5 and 7. See			
IV.	discrimination based on race, color, national origin	plaints decided against the applicant/recipient within the last y , sex, age, or disability and enclose a copy of all decisions. Pl aints not covered by 40 C.F.R. Parts 5 and 7. See instructions	ease describe all corrective			
V. 1		nt/recipient conducted by any agency within the last two years used on the review. Please describe any corrective action taken				
VI.	Is the applicant requesting EPA assistance for new	construction? If no, proceed to VII; if yes, answer (a) and/or	(b) below.			
a. If the gra	accessible to and usable by persons with disabilitie	facilities or alterations to existing facilities will not be readily	-			
VII.*	Does the applicant/recipient provide initial and con age, or disability in its programs or activities? (40	tinuing notice that it does not discriminate on the basis of race C.F.R. \S 5.140 and \S 7.95)	, color, national origin, sex,			
o. Is the no	a. Do the methods of notice accommodate those with impaired vision or hearing? b. Is the notice posted in a prominent place in the applicant's offices or facilities or, for education programs and activities, in appropriate periodicals and other written communications? c. Does the notice identify a designated civil rights coordinator?					
VШ.*	/III.* Does the applicant/recipient maintain demographic data on the race, color, national origin, sex, age, or handicap of the population it serves? (40 C.F.R. § 7.85(a))					
IX.*	Does the applicant/recipient have a policy/procedur (40 C.F.R. Part 7, E.O. 13166)	re for providing access to services for persons with limited En	glish proficiency?			
X.* compliance	e with 40 C.F.R. Parts 5 and 7? Provide the name, tit	r activity, or has 15 or more employees, has it designated an e de, position, mailing address, e-mail address, fax number, and				
XI*	mumber of the designated coordinator. XI* If the applicant/recipient is an education program or activity, or has 15 or more employees, has it adopted grievance procedures that assure the prompt and fair resolution of complaints that allege a violation of 40 C.F.R. Parts 5 and 7? Provide a legal citation or Internet address for, or a copy of, the procedures.					
		For the Applicant/Recipient				
false or r	I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. I assure that I will fully comply with all applicable civil rights statutes and EPA regulations.					
A. Signa	nture of Authorized Official	B. Title of Authorized Official	C. Date			
	For the U	J.S. Environmental Protection Agency				
complian	nce information required by 40 C.F.R. Parts 5 and 7; F.R. Parts 5 and 7; and that the applicant has given as	cipient and hereby certify that the applicant/recipient has subn that based on the information submitted, this application satis surance that it will fully comply with all applicable civil right	fies the preaward provisions			
A. Sig	nature of Authorized EPA Official	B. Title of Authorized EPA Official	C. Date			
See ** n	ote on reverse side		ı			

EPA Form 4700-4 (Rev. 04/2009). Previous editions are obsolete.

Instructions for 4700-4 (Preaward Compliance Review)

Instructions for EPA FORM 4700-4 (Rev. 04/2009)

General

Recipients of Federal financial assistance from the U.S. Environmental Protection Agency must comply with the following statutes and regulations.

Title VI of the Civil Rights Acts of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Act goes on to explain that the statute shall not be construed to authorize action with respect to any employment practice of any employer, employment agency, or labor organization (except where the primary objective of the Federal financial assistance is to provide employment).

Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act provides that no person in the United States shall on the ground of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the Federal Water Pollution Control Act, as amended. Employment discrimination on the basis of sex is prohibited in all such programs or activities.

Section 504 of the Rehabilitation Act of 1973 provides that no otherwise qualified individual with a disability in the United States shall solely by reason of disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Employment discrimination on the basis of disability is prohibited in all such programs or activities.

The Age Discrimination Act of 1975 provides that no person on the basis of age shall be excluded from participation under any program or activity receiving Federal financial assistance. Employment discrimination is not covered. Age discrimination in employment is prohibited by the Age Discrimination in Employment Act administered by the Equal Employment Opportunity Commission.

Title IX of the Education Amendments of 1972 provides that no person in the United States on the basis of sex shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. Employment discrimination on the basis of sex is prohibited in all such education programs or activities. Note: an education program or activity is not limited to only those conducted by a formal institution.

40 C.F.R. Part 5 implements Title IX of the Education Amendments of 1972.

40 C.F.R. Part 7 implements Title VI of the Civil Rights Act of 1964, Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act, and Section 504 of The Rehabilitation Act of 1973.

The Executive Order 13166 (E.O. 13166) entitled; "Improving Access to Services for Persons with Limited English Proficiency" requires Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Items

"Applicant" means any entity that files an application or unsolicited proposal or otherwise requests EPA assistance. 40 C.F.R. §§ 5.105, 7.25.

"Recipient" means any entity, other than applicant, which will actually receive EPA assistance. 40 C.F.R. §§ 5.105, 7.25.

"Civil rights lawsuits and administrative complaints" means any lawsuit or administrative complaint alleging discrimination on the basis of race, color, national origin, sex, age, or disability pending or decided against the applicant and/or entity which actually benefits from the grant, but excluding employment complaints not covered by 40 C.F.R. Parts 5 and 7. For example, if a city is the named applicant but the grant will actually benefit the Department of Sewage, civil rights lawsuits involving both the city and the Department of Sewage should be listed.

"Civil rights compliance review" means any review assessing the applicant's and/or recipient's compliance with laws prohibiting discrimination on the basis of race, color, national origin, sex, age, or disability.

Submit this form with the original and required copies of applications, requests for extensions, requests for increase of funds, etc. Updates of information are all that are required after the initial application submission.

If any item is not relevant to the project for which assistance is requested, write "NA" for "Not Applicable."

In the event applicant is uncertain about how to answer any questions, EPA program officials should be contacted for clarification.

- Questions VII XI are for informational use only and will not affect an applicant's grant status. However, applicants should answer all questions on this form. (40 C.F.R. Parts 5 and 7).
- ** Note: Signature appears in the Approval Section of the EPA Comprehensive Administrative Review For Grants/Cooperative Agreements & Continuation/Supplemental Awards form.

Approval indicates, in the reviewer's opinion, questions I – VI of Form 4700-4 comply with the preaward administrative requirements for EPA assistance.

"Burden Disclosure Statement"

EPA estimates public reporting burden for the preparation of this form to average 30 minutes per response. This estimate includes the time for reviewing instructions, gathering and maintaining the data needed and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to U.S. EPA, Attn: Collection Strategies Division (MC 2822T), Office of Information Collection, 1200 Pennsylvania Ave., NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

The information on this form is required to enable the U.S. Environmental Protection Agency to determine whether applicants and prospective recipients are developing projects, programs and activities on a nondiscriminatory basis as required by the above statutes and regulations.

Optional but recommended form for all IGAP applicants:

KEY CONTACTS

<u>AUTHORIZED REPRESENTATIVE</u> - This is the individual who has the authority to sign the application for Federal Assistance (SF-424) and execute the Agreement on behalf of the applicant.

Circle One (Mr. Mrs. Ms.) NAME:	
TITLE:	
TELEPHONE:	FAX:
E-MAIL ADDRESS:	
PROGRAM/PROJECT MANAGER - applicant.	This is the individual who is responsible for the management of the Project for the
Circle One (Mr. Mrs. Ms.) NAME:	
TITLE:	
TELEPHONE:	FAX:
E-MAIL ADDRESS:	
FINANCIAL REPRESENTATIVE - Thi accounting and financial managem	s is the individual who has been assigned responsibility for the maintenance of the nent system for the applicant.
Circle One (Mr. Mrs. Ms.) NAME:	
TITLE:	
TELEPHONE:	FAX:
E-MAIL ADDRESS:	
PAYEE ADDRESS - If different than	recipient address:
NAME:	
ADDRESS:	
CITY STATE 7IP.	

Entering Work Plans in GAP Online

As noted earlier, beginning in FY11, work plans must be entered in the web based GAP Online system. When completed in the system, work plans can be viewed, printed, and saved as Adobe pdf documents or Rich Text documents.

Log in with the user name and password assigned to your Tribe. EPA will soon be transitioning to individual user accounts that include individual user names and password. Individual login information can also be used now if you have this type of account. To access GAP Online, copy and paste the following link in your web browser: https://ofmext.epa.gov/GAP_Online/.

Login (Authorized users only)
To login with existing Tribal-wide user account, please type in Username and Password, then click on the "Login" button. Password is case sensitive.)
Username:
Password:
Login Forgot Password

GAP Online System Requirements

GAP Online 2.3.5 has the following system requirements:

- ❖ Microsoft Windows XP, Microsoft Windows Vista, or Microsoft Windows 7
- ❖ Microsoft Internet Explorer 7 or later
- ❖ Adobe Portable Document Reader (PDF) Reader
- ❖ JavaScript and cookies enabled
- Popup blockers disabled

Internet Explorer Compatibility

❖ GAP Online may not display correctly in Windows Internet Explorer 8 and 9. Portions of a Web page may be missing, information in a table may appear in the wrong location, or colors and text may be incorrect.



❖ If a portion of a Web page is blank or doesn't display correctly, enable Compatibility View by selecting the Compatibility View button on the Address bar.

The Compatibility View button does not need to be selected again for GAP Online once it has been selected. The next visit to GAP Online will automatically display in Compatibility View.

Mac Operating System Support

GAP Online is not compatible with Apple Safari and Mozilla Firefox for Mac OS X, and is only supported by Microsoft Internet Explorer for Microsoft Windows.

Request a Forgotten Password

- ❖ Go to the GAP Online login page.
- Select the Forgot Password button.
- Enter your username in the Forgot Password window.
- ❖ Select the **Submit** button.
- ❖ A new password will be sent to the e-mail address for the username entered in the **Forgot Password** window.



Changing Your Password

- ❖ Log into GAP Online.
- ❖ Select the **User Profile** hyperlink on the left side of the page.
- ❖ Enter a new password in the New Password field on the User Profile page. Confirm the new password by entering it into the Confirm New Password field.
- Select the Save button to save the updated password

Indian General Assistance Program (GAP) Onlin

GAP Online Home

User Profile

Try ERRT Report

About GAP Online

Quick Reference Guide

Contact Us

Logout

Logout

Logout

Logout

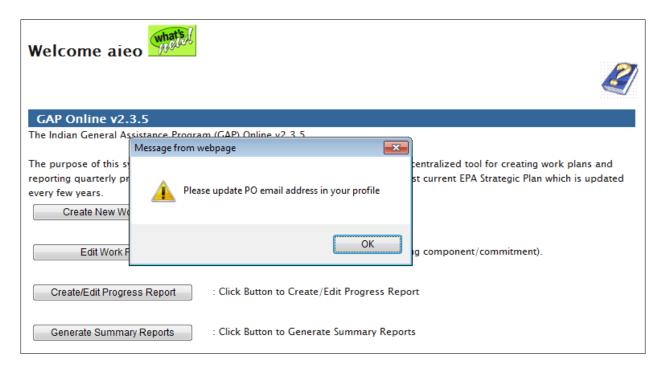
CAP Online V2.3.5

The Indian General Assistance Program (The purpose of this system is to provide reporting quarterly progress. These designs and the contact of the purpose of the conta

Select the "User Profile" hyperlink.

First Time Configuration for GAP Online:

- ❖ A first time user will be prompted to add the e-mail address of their Project Officer.
- ❖ Select on the **User Profile** hyperlink located on the left side of the page.

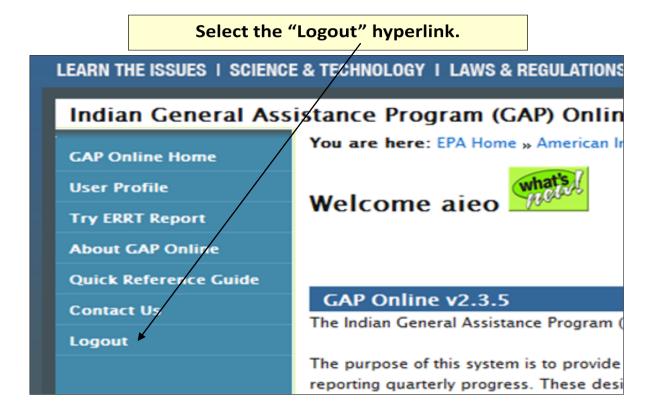


- ❖ On the **User Profile** page, enter your Project Officer's e-mail address.
- ❖ Select the **Save** button.
- ❖ E-mail addresses in the User Profile page will be used for GAP Online notifications during work plan negotiations and progress reporting.



Logout of GAP Online

❖ Save your work **prior** to selecting the **Logout** hyperlink at the left side of the page. This will insure that any changes to your work are current.



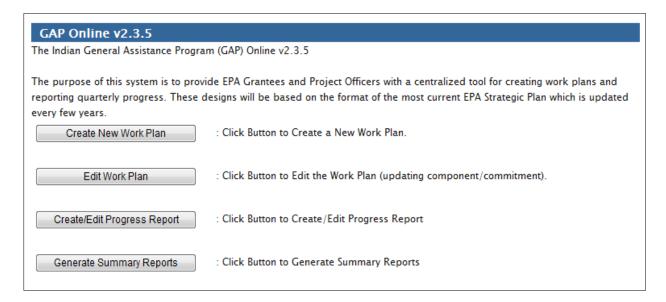
GAP Online Navigation

The left side menu lists the specific tasks that may be completed by the tribal user:

- **GAP Online Home:** Returns user to the GAP Online Welcome Home Page
- **User Profile:** Lists the Tribal User Profile information including Name and Contact Information
- **Try ERRT Report:** Will allow you to access the Environmental Results Reporting Tool (ERRT) developed by EPA Region 9 Regional Tribal Operations Committee
- **About GAP Online:** Access information about GAP Online and program guidance
- Quick Reference Guide: Download condensed instructions for using GAP Online
- Contact Us: Lists the EPA contact information for the Tribal User
- Logout: Logs user out of GAP Online

Working in GAP Online:

- ❖ Tribal users can create a new work plan, edit an existing work plan, create or edit a progress report, and generate summary reports
- ❖ A work plan is created by the Tribe and composed of Tribal specific data
- The work plan data includes the work plan components, financial attributes, descriptive information, and additional attachments
- ❖ The work plan is managed in a cooperative effort between the Tribe, the EPA Regional office in which the Tribe is located, and EPA Headquarters



- ❖ Create New Work Plan: Provides access to create a Work Plan
- ❖ Edit Work Plan: Provides access to view, update, delete and print a Work Plan
- Create/Edit Progress Report: Provides access to report on work plan implementation and review work plans that are in progress (for work plans with an Accepted status)
- Generate Summary Reports: Provides access to windows to create reports. You can access both national and regional reports based on grant types, number of Tribes participating, or projected environmental outcomes.

Introduction to Work Plans in GAP Online

- ❖ A tribe can create new work plans and maintain existing work plans for each year a plan is in place.
- ❖ A work plan can include any number of components. Each component can include any number of commitments.
- ❖ The tribe can create a work plan to submit to the Project Officer assigned to the Tribe by the EPA Region.

❖ The Project Officer will review, negotiate, and approve each submitted work plan. The work plan must be completed to the fullest extent possible (all required fields are populated with information) prior to the submission to the EPA Region.

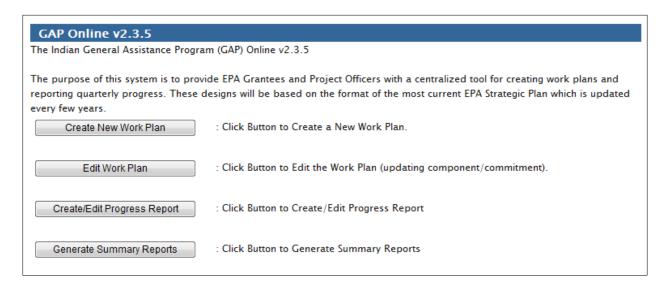
Work Plan Lifecycle

- ❖ A work plan can be in one of the following states during its lifecycle:
 - <u>Created</u>: the Tribal user created the work plan, which can be edited in this state.
 - <u>Submitted</u>: the Tribal user submitted the work plan to the Regional Project Officer for approval. The work plan is non-editable by Tribal user. The Regional Project Officer can either accept or comment.
 - <u>Reviewed</u>: the Regional Project Officer has opened the work plan and is in the process of reviewing its content. The work plan cannot be edited while it is in review.
 - <u>Commented</u>: the Tribal user can read comments and modify the work plan. After the modification, the work plan must be re-submitted to the Regional Project Officer.
 - <u>Accepted</u>: no changes can be made at this time. In this status, the Regional Project Officer can unlock the work plan if the Tribal user has additional information to include. If the work plan is unlocked, it reverts to the Commented status.
- ❖ Below is a list of work plans in various lifecycle states:

Start	End	🗘 Total Cost	Status	Last Update	Action
10/01/2009	09/30/2010	\$106000	Created	13 Oct 2009 10:46 AM EST	∜ ★
10/01/2009	09/30/2010	\$156000	Review	14 Oct 2009 09:54 AM EST	♦ ★
10/01/2009	09/30/2010	\$52600	Commented	14 Oct 2009 09:55 AM EST	♦ ★
10/01/2009	09/30/2010	\$88000	Submitted	14 Oct 2009 09:56 AM EST	♦ ★
10/01/2010	09/30/2011	\$70000	Accepted	22 Oct 2009 01:42 PM EST	♦

Creating a Work Plan

Select the Create New Work Plan button from the group of buttons on your GAP Online Home Page.



- ❖ The Tribe name and Region identification information will already be entered for you in a display field
- ❖ Select the appropriate work plan period for your new work plan from the calendar

Create	New Work Plan
<u>Tribe:</u>	Raven
Region:	20
Work Plan Per	od: Begin: 10/01/2010
	End: 09/30/2011
Copy Data fro	m Previous Work Plans? 🔲
Save	

❖ Select the **Copy Data from Previous Work Plans** box to select this option then click outside the box to view the table of all available work plans. This feature is useful if you are continuing a project started in the previous fiscal year or starting a new work plan similar to one from an earlier year.

Copy Data from Previous Work Plans?

	Start \$\int\$	🔷 End	Status	🔷 Grant Number	# of Components
0	10/01/2008	09/30/2009	Commented	1234_56789	1
0	10/01/2008	09/30/2009	Created		4
0	04/13/2009	12/23/2009	Created		3

- ❖ Once a work plan is created, you can select other tribal users to receive work plan notifications by choosing their username from the **Authors** section.
- ❖ Enter a description about the work plan.
- Select the Save button to save your updates.

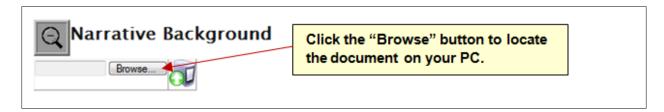
<u>Tribe:</u>	Raven
EPA Tribal Code	<u>e:</u> 999
Region:	20
Status:	Created
Reporting Frequ	uency:To Be Entered by Project Officer
Authors:	✓ aieo
	□ raven1
<u>Description:</u>	^ ~
Work Plan Perio	od: Begin: 10/01/2010
	End: 09/30/2011
<u> S</u> ave	

Add Narrative Background Information

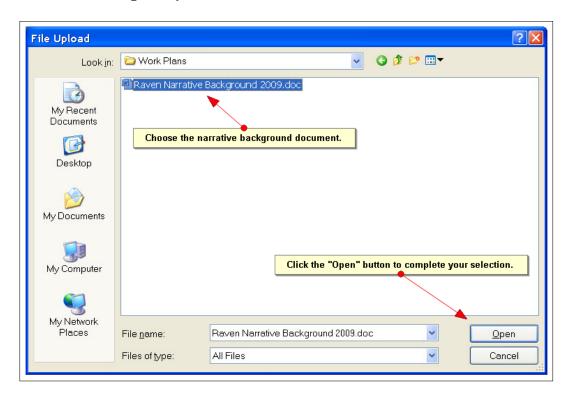
- ❖ Once the work plan has been created, you can attach a Narrative Background file to the work plan.
- ❖ Select the View Details button (magnifying glass) to expand the Narrative Background section of the work plan.



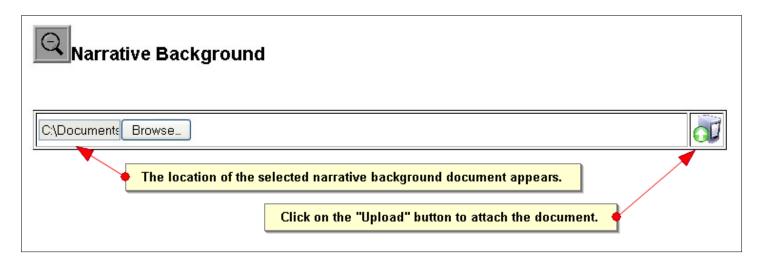
Select the **Browse** button to locate your file containing the narrative background for your tribe.



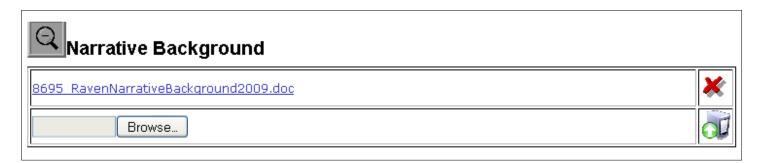
Once you have found the narrative background file on your computer, click the Open button to complete your selection.



The location of the file will appear next to the **Browse** button. Click the **Upload** button to attach the selected file to the **Narrative Background** section.

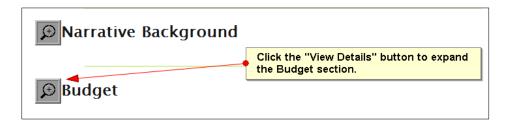


- ❖ The narrative background file will appear as an attached document.
- Click the **Delete** button if you wish to delete the corresponding file.

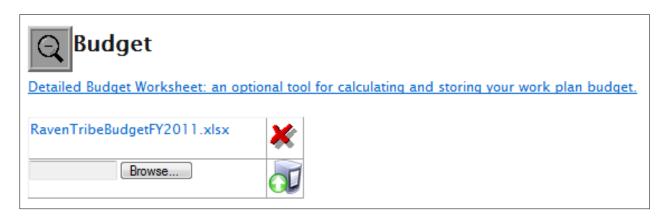


Add Budget Information

- Uploading budget information can be performed in the same way as narrative background information.
- Click the View Detail button to expand the Budget section.
- Click the **Browse** button to locate your budget document. Click on the **Open** button to complete your selection.
- Click the **Upload** button to attach the selected document to the Budget section
- ❖ The location of the file will appear next to the **Browse** button.

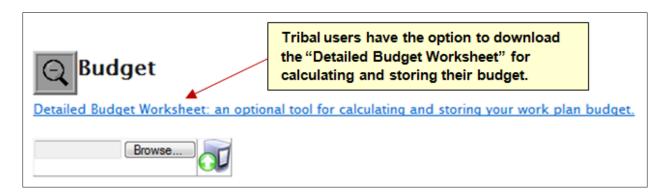


- ❖ The budget file will appear as an attached document.
- ❖ Select the **Delete** button to delete the corresponding uploaded budget file.

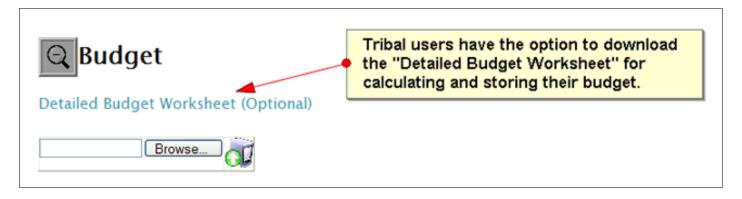


Detailed Budget Worksheet

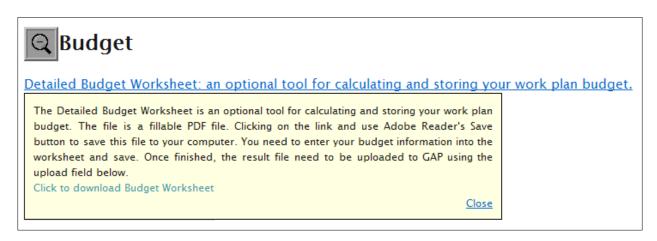
- ❖ The **Detailed Budget Worksheet** is an optional tool for calculating and storing your work plan budget. You can download the file onto your PC and enter your budget information into the worksheet.
- Click on the Detailed Budget Worksheet: an optional tool for calculating and storing your work plan budget hyperlink.



- Click the Save button of the Adobe Reader to save the file to your local computer.
- Upload the file into the **Budget** section once the worksheet has been completed.



A yellow box will appear below the hyperlink, explaining the purpose of the worksheet and how to save the file to your computer. Select the **Click to Download Budget Worksheet** hyperlink.

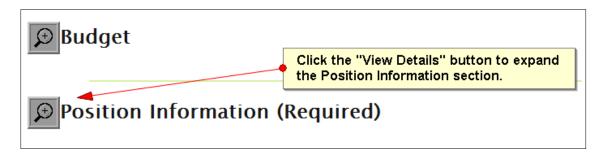


- ❖ The Detailed Budget Worksheet will appear in a new window. Select the Save button of the Adobe PDF reader to save this file to your computer or another location.
- ❖ Enter your budget information into the worksheet.
- Select the **Save** button to capture the information in the worksheet.
- ❖ Once the worksheet has been completed, follow the steps of **Enter Budget Information** to upload the Detailed Budget Worksheet into the Budget section of the work plan.
- ❖ The **Detailed Budget Worksheet** requires the Adobe PDF reader software (http://get.adobe.com/reader/) installed on the user's PC.

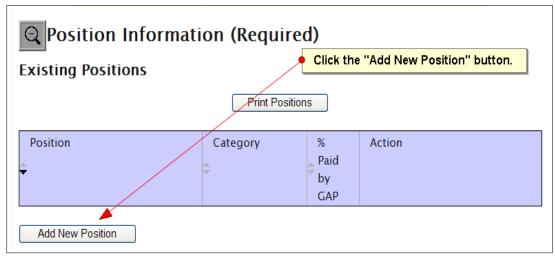
Add Position Information

- ❖ The **Position Information** section allows you to identify the skill sets of the people who will be utilized in performing the work identified in the work plan, as well as the percentage of the IGAP funding that will be used to support them.
- ❖ The personnel entered will be referenced during the creation of commitments.

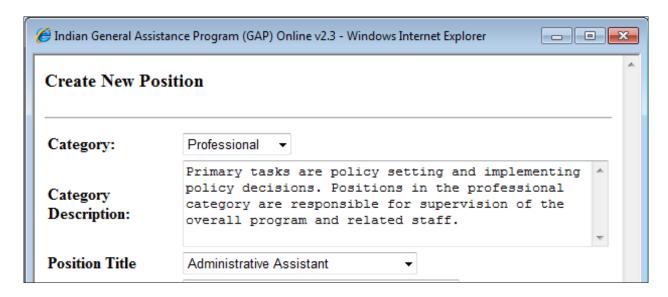
Click the View Details button to expand the Position Information section of the work plan.



Click the Add New Position button to view the Create New Position screen.

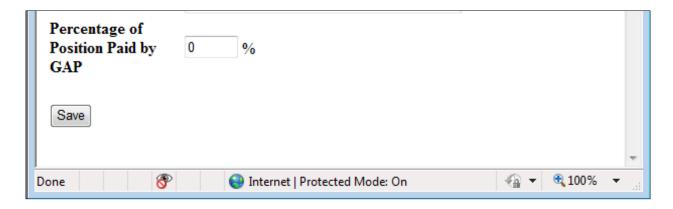


- ❖ Select a category from the **Category** drop-down list.
- ❖ The Category Description will appear based on your selection from the Category drop-down list.
- **❖** Select a position title from the **Position Title** drop-down list.
- ❖ If **Other** is selected, enter a new position title.



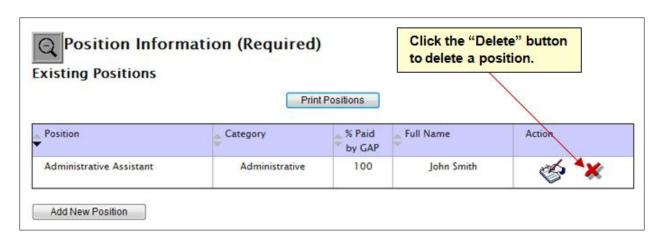
Enter Position Background Information

- ❖ Enter the percentage paid by GAP funding for this position into the Percentage of Position Paid by GAP textbox.
- ❖ Select the **Save** button to save the position information.
- ❖ The new position will appear in the **Position Information** section.



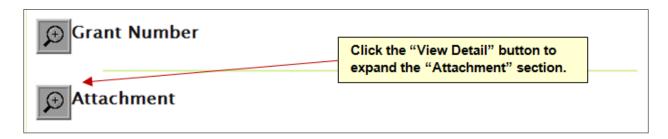
Delete Position Information

- ❖ To delete a position, select the Delete button corresponding to a position.
- ❖ Select the OK button on the confirmation message if you are sure you want to delete the position.
- ❖ Be careful with deleting a position. Once the position is deleted, it cannot be retrieved.



Add Work Plan Attachments

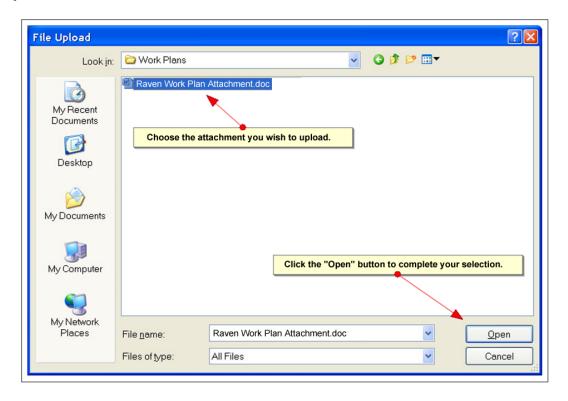
❖ To attach files to your work plan, select the View Details button for the Attachment section.



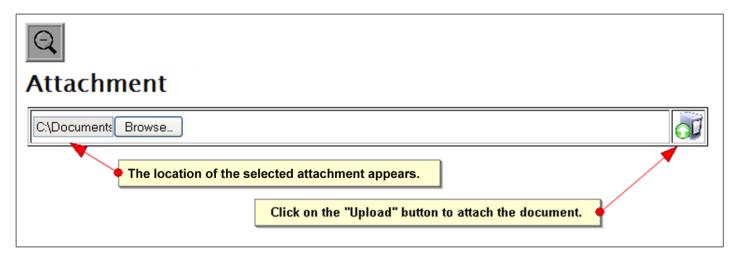
Click the **Browse** button to locate the document that you want to attach to the work plan.



Once you have found the document on your computer, click on the **Open** button to complete your selection.



- ❖ The location of the document will appear next to the **Browse** button.
- Click the **Upload** button to attach the selected document to the **Attachment** section.
- ❖ The selected document will appear as an attached document.



- ❖ To delete an attachment, select the **Delete** button corresponding to the attachment.
- ❖ Select the **OK** button on the confirmation message if you are sure you want to delete the attachment.
- ❖ Be careful with deleting a attachment. Once the attachment is deleted, it cannot be retrieved.

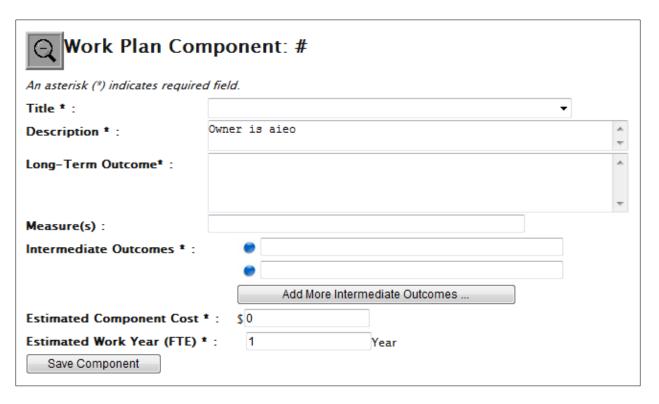


Create a Work Plan Component

❖ At the bottom of the **Edit Work Plan** page, select the **Create Work Plan Component** button.



Once the Create New Component button is clicked, the Work Plan Component screen appears.



- ❖ Enter the appropriate title as you wish to word it or select a pre-defined title from the drop-down list of available titles.
- ❖ The title of a work plan component cannot be greater than two hundred characters.
- **❖** The **Title** field is required.



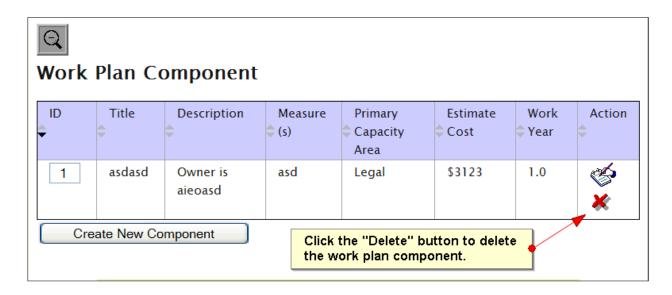
- ❖ In the **Description** field, delete the default data "Owner is......" and enter a description of the work component associated with the work plan that gives an overview of what environmental activities the component will address.
- **❖** The **Description** field is required.*



- ❖ Enter the Long-Term Outcome
- **❖** Enter the Measures
- **❖** Enter the Intermediate Outcomes
- Enter the Estimated Component Cost
- Enter the Estimated Work Year (FTE)
- ❖ Select the Save Component button to save the work plan component data
- ❖ The Long-Term Outcome, Intermediate Outcomes, Estimated Component Cost, and Estimated Work Year (FTE) fields are required.

Delete a Work Plan Component

- ❖ To delete a component, select the **Delete** ★ button corresponding to the component.
- ❖ Select the **OK** button on the confirmation message if you are sure you want to delete the component.
- ❖ Be careful with deleting a component. Once the component is deleted, it cannot be retrieved.



Create a Work Plan Commitment

- ❖ Once the work plan component is created, the **Work Plan Commitment** section will appear.
- Click the New Commitment button located at the bottom of the screen to enter a new commitment.



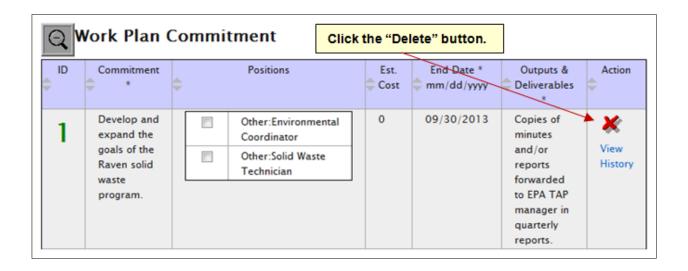
- ❖ Enter the work commitment information for your work plan component.
- ❖ All information for the commitment is stored in the commitment table and remains on the same screen as the component. This allows you to retain the component information as you develop the commitments

QV	Vork Plan (Commi	tment				
ID	Commitment *	‡	Positions	Est. Cost	End Date * mm/dd/yyyy	Outputs & Deliverables	Action
1	Develop and expand the goals of the Raven solid waste program.		Other:Environmental Coordinator Other:Solid Waste Technician	0	09/30/2013	Copies of minutes and/or reports forwarded to EPA TAP manager in quarterly reports.	View History

- ***** Enter a description of the commitment in the **Commitment** field.
- ❖ Select the **Positions** required to complete the commitment
- ❖ Enter the estimated commitment cost from the **Estimated Cost** field.
- ❖ Enter the end date for the commitment in the **End Date** field.
- **❖** Enter the outcome and deliverables in the **Outcomes and Deliverables** field.
- ❖ The Commitment, End Date, and Outcomes and Deliverables fields are required.
- Click on the **Save Commitment** button to save the work plan commitment information you entered.

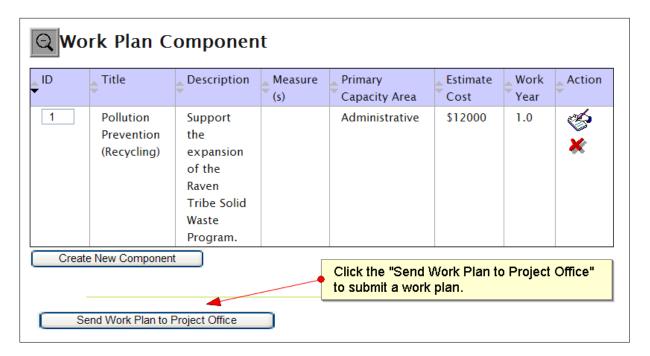
Delete a Work Plan Commitment

- ❖ To delete a commitment, select the **Delete** ★ button.
- ❖ Select the **OK** button on the confirmation message if you are sure you want to delete the commitment.
- ❖ Be careful with deleting a commitment. Once the commitment is deleted, it cannot be retrieved.



Sending Work Plan to Project Officer

Once you have completed all of the necessary work components and commitments and uploaded all the supporting documents associated with the work plan, click on the **Send Work Plan to Project Office** button.

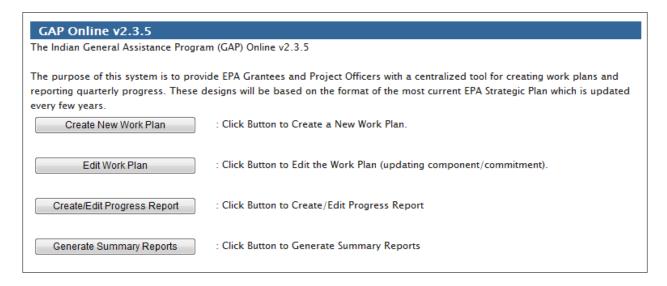


- ❖ You can enter an optional version number of the work plan as well as any additional comments you have for the Project Officer who reviews the tribe's plan.
- ❖ When you are ready to submit the work plan, select the Confirm Sending Work Plan to Project Office button.

Sending Work Plan to Regional Project Officer	
Tribe Name: Raven Submitted By: aieo Submitted on: 2009-10-27 12:20:29 Version: Comment:	
Confirm Sending Work Plan to Project Office	Cancel

Viewing/Editing a Work Plan

- ❖ Select the **Edit Work Plan** button on your GAP Online home page.
- ❖ The tribe's work plans will be displayed.
- Identify the work plan from the list of work plans with Approved, Reviewed, or Submitted status.



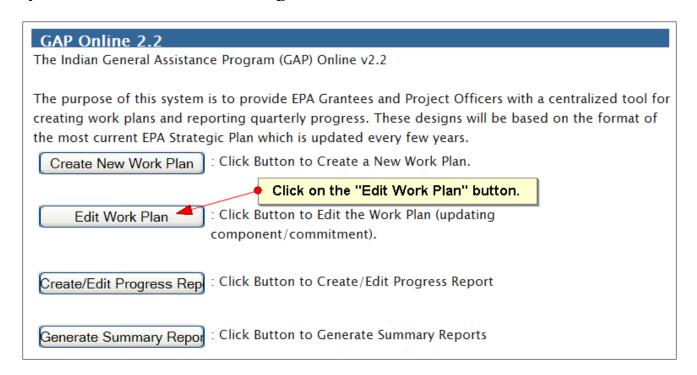
❖ To view the work plan, select the **View Work Plan** ■ button corresponding to the work plan.

♦ Start	End	🔷 Total Cost	Status	Last Update	Action
01/05/2009	11/30/2009	\$15000	Accepted	15 Apr 2009 10:42 AM EST	Q.
04/04/2009	09/30/2010	\$35000	Review	17 Jun 2009 08:51 AM EST	P
05/01/2018	09/30/2019	\$123456	Commented	14 Oct 2009 01:48 PM EST	*

Updating a Work Plan

- Once the work plan is created, the work plan may continue to be edited and modified so long as the tribal user has not selected the **Send Work Plan to Project Office** option and submitted the work plan to the Region.
- ❖ Once the work plan has been submitted, it must be released by the Project Officer in order for the tribal user to edit it.

On your **GAP Online Home Page**, click the **Edit Work Plan** button.



❖ The work plans for your tribe will be displayed in a list.

- ❖ Identify the work plan with a status of **Created** or **Commented** from the list.
- ❖ Click the **Edit** button corresponding to the work plan.

Start	End	🗘 Total Cost	Status	Last Update	Action
10/01/2009	09/30/2010	\$156000	Created	13 Oct 2009 10:46 AM EST	∜ ★
10/01/2009	09/30/2010	\$156000	Created	14 Oct 2009 09:54 AM EST	♦ ★
10/01/2009	09/30/2010	\$156000	Created	14 Oct 2009 09:55 AM EST	∜ ★

Recalling a Work Plan

- ❖ A tribal user can recall a submitted work plan **ONLY** if it has not yet been opened by the Project Officer.
- ❖ Once a work plan is opened for review by the Project Officer, it will be locked and you will not be able to modify it until the Project Officer refers it back to you.
- ❖ To recall a work plan, select the **Recall** button corresponding to the work plan.
- Select the **OK** button on the confirmation message if you are sure you want to recall the submitted work plan.
- ❖ Once you select the **OK** button, an e-mail will be generated and sent to the Project Officer notifying them that the work plan has been recalled.



GAP Online Progress Reports

- ❖ A progress report is a useful tool for reporting what has been accomplished for work plan commitments.
- ❖ The reporting frequency is set by the Project Officer before the work plan is accepted. Depending on the required reports (monthly, quarterly, semi-annually, or annually), you will update information on how commitments addressing the work plan are being completed
- ❖ Beginning with the third quarter of FY12, quarterly reports must be entered in GAP Online.

Reporting Progress on Commitments

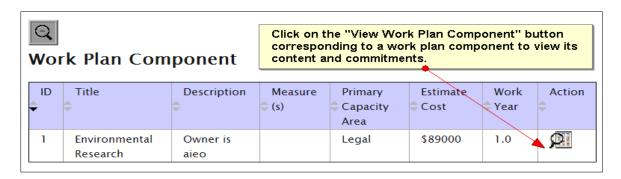
- ❖ Commitments are updated within the Progress Report to reflect their completion. Deliverables associated with the completed commitment can also be uploaded as attachments.
- ❖ Reporting frequency: The reporting frequency is set by the Project Officer before the work plan is accepted. Depending on the required reports (monthly, quarterly, semi-annually, or annually), you will update information on how commitments addressing the work plan are being completed.
- Click the Create/Edit Progress Report button on the GAP Online Home Page.



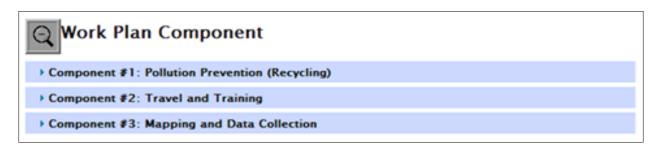
- ❖ Select the **View Work Plan Progress Report** [⚠] button corresponding to an **Accepted** work plan
- ❖ **Note**: You can only start reporting on activities for a work plan after the plan has been accepted by the Project Officer.

🔷 Start	≑ End	🔷 Total Cost	Status	Last Update	Action
01/05/2009	11/30/2009	\$15000	Accepted	15 Apr 2009 10:42 AM EST	
04/04/2009	09/30/2010	\$0	Revie	17 Jun 2009 08:51 AM EST	Ø.
05/01/2018	09/30/2019	\$123456	Commented	14 Oct 2009 01:48 PM EST	Ø.
				elect work plans with "Accepted ocreate and edit progress report	

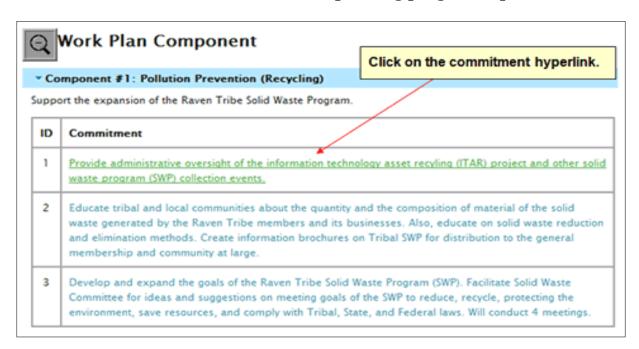
❖ Select the **View Work Plan Component** ⚠ button corresponding to a component.



❖ Select the component title to expand the component and view its corresponding commitments.



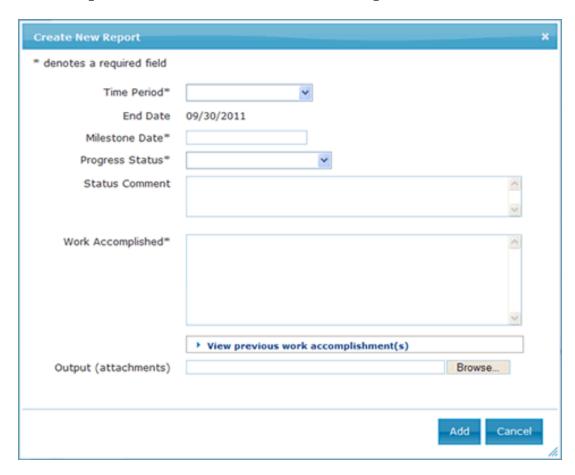
❖ Select a commitment to view its corresponding progress report.



- ❖ You will be redirected to the **Progress** Report section.
- ❖ Select the Create New Report button to view the Create New Report window.



❖ Select the time period from the **Time Period** drop-down menu.



- ❖ Enter the milestone date in the **Milestone Date** field by typing a date or using the calendar pop-up browser window.
- ❖ Select the status of the work plan commitment from the **Progress Status** drop-down menu.
- ❖ Enter a comment about the progress status into the **Status Comment** field.
- ❖ Enter the status of the commitment and additional requirements for the commitment into the **Work Accomplished** field.
- ❖ To upload documents related to the progress report, select the **Browse** button under the **Output (attachments)** column. Locate the file from your PC that you wish to upload.
- ❖ Select the **Add** button to save the new progress report.
- ❖ A new progress report will appear with the status of **Created.**

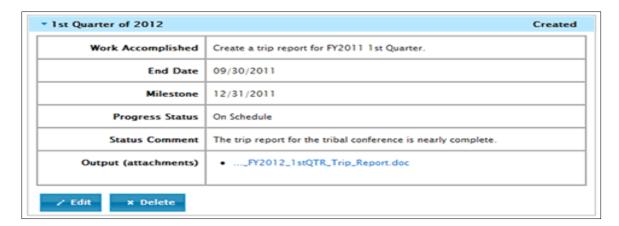


Progress Report Lifecycle

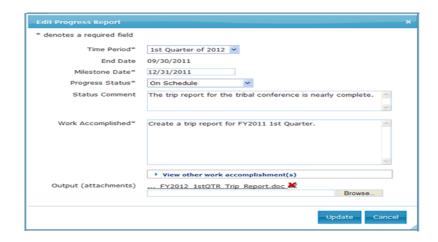
- ❖ A progress report can be in one of the following states during its lifecycle:
 - **Created**: the tribal user created the progress report, which can be edited in this state.
 - **Returned**: the Regional Project Officer has reviewed the progress report, and returned the progress report to the tribal user for updates. The progress report can be edited by the tribal user in this state.
 - **In Negotiation**: the Regional Project Officer has returned a resubmitted progress report. The progress report can be edited by the tribal user in this state. The progress report continues to be in this state during the negotiation process until it is accepted by the Regional Project Officer.
 - **Accepted**: the progress report is accepted by the Regional Project Officer. In this state, the Regional Project Officer can unlock the progress report if the tribal user has additional information to include. If the progress report is unlocked, it reverts to the **In Negotiation** status.

Updating Progress Reports

- Once a progress report has been created and saved, a tribal user can update it during an active reporting period.
- ❖ On the **View Work Plan Progress** page, select a component title to expand the component (Figure 99). A list of commitments corresponding to the component will appear.
- Select a commitment to view its corresponding progress report.
- ❖ Select a progress report with **Created**, **Returned**, or **In Negotiation** status to view the content of the progress report.
- ❖ Select the **Edit** button to open the **Edit Progress Report** window.

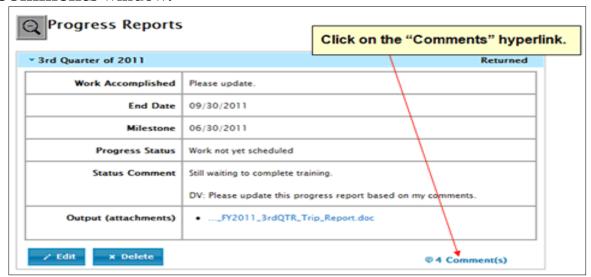


- ❖ Make the necessary updates to the progress report.
- ❖ Select the **Update** button to update the progress report.

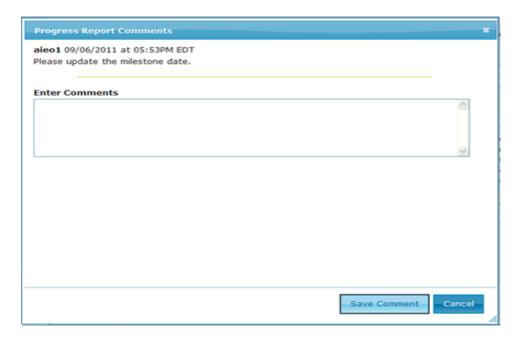


Progress Report Comments

- ❖ A Project Officer can add a comment for a progress report to request additional information from the tribal user.
- **Expand** a progress report to view the content of the progress report.
- Select the Comment(s) button to view comments in the Progress Report Comments window.



❖ Once you have reviewed the Project Officer's comments, close the **Progress Report Comments** window by selecting the **Cancel** button or the **Exit** (close) button in the top-right corner.

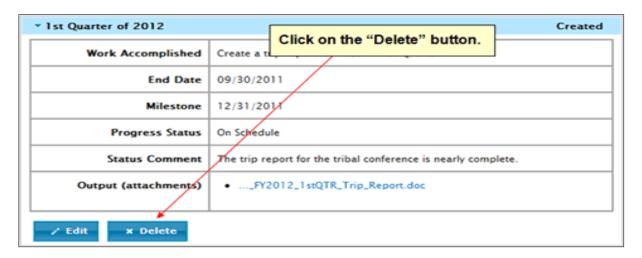


Respond to Progress Report Comments

- ***** Expand a progress report to view the content of the progress report.
- Select the Comment(s) button to view comments in the Progress Report Comments window.
- ***** Enter a response to a comment in the **Enter Comments** field.
- ❖ Select the **Save Comment** button to save the response.

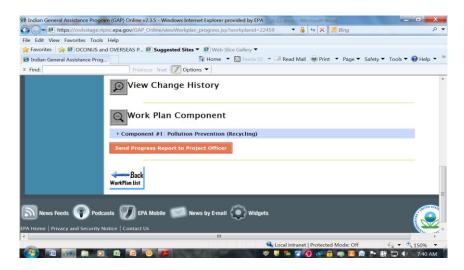
Deleting a Progress Report

- ❖ A tribal user can delete a progress report that is not in **Accepted** status.
- ***** Expand a progress report to view the content of the progress report.
- ❖ Select the **Delete** button to delete the progress report.

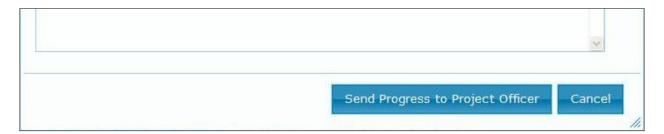


Send Progress Reports to Project Officer

❖ After all progress reports have been created for a selected reporting period, the tribal user can request a review by the Project Officer by using the Send Progress Report by Project Officer button.



- ❖ A window will appear that allows the tribal user to enter comments to the Project Officer.
- **!** Enter an optional comment in the **Enter Comments** field.
- Select the Send Progress to Project Officer button to submit the progress report to your Regional Project Officer.
- ❖ An e-mail notification will be sent to your Regional Project Officer informing him/her of your progress report submission.



Unlock an Accepted Progress Reports

- ❖ An **Accepted** progress report cannot be edited by the tribal user.
- ❖ A tribal user can request the Regional Project Officer to unlock an **Accepted** work plan.
- ❖ Once the work plan is unlocked, it reverts to **In Negotiation** status.

View Progress Report as PDF

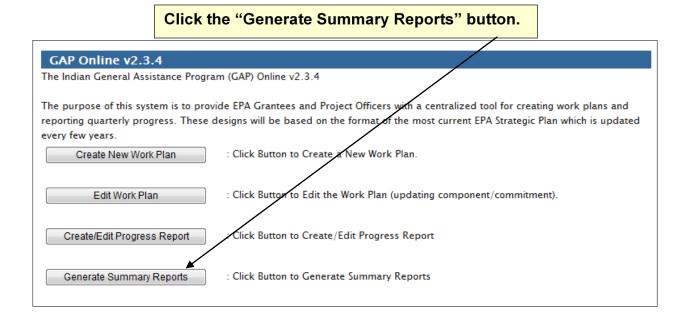
Click on the **View as PDF** button to view work plan progress reports in Portable Document Format (PDF) format. Click on the **Change History** button to view detail of the change history of the selected work plan progress report.

Summary Reports

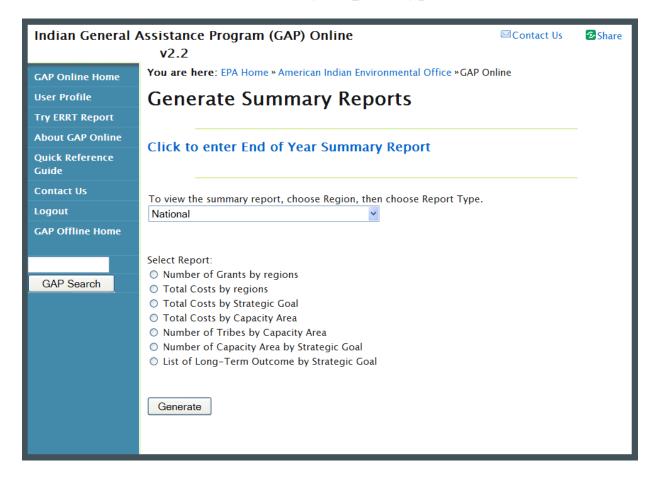
❖ Summary reports are compiled from all data entries into GAP Online system and reflect activities that Tribes pursue throughout the course of the work plan to address environmental issues at the Tribal level.

Generate End-of-Year Summary Report

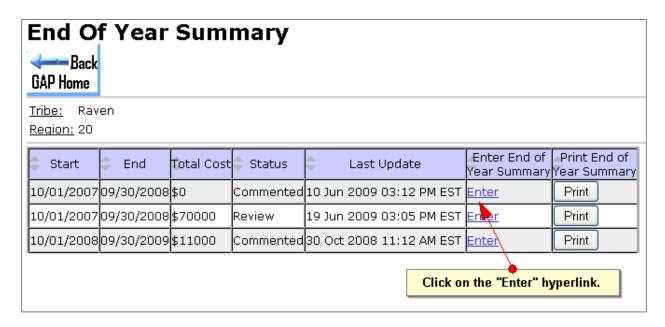
Select the Generate Summary Reports button from the menu selections on the GAP Online Home Page.



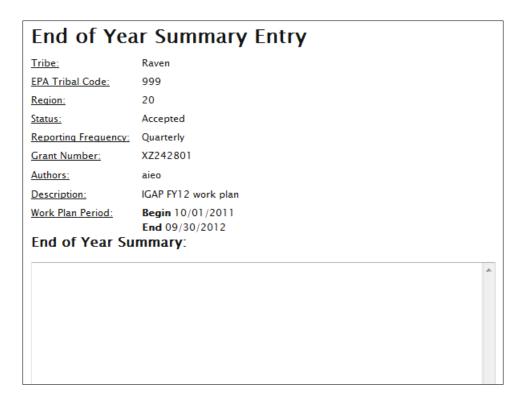
- **❖** The **Generate Summary Reports** page will appear
- **❖** Select the **End of Year Summary Report** hyperlink.



❖ Select the **Enter** hyperlink corresponding to a work plan.

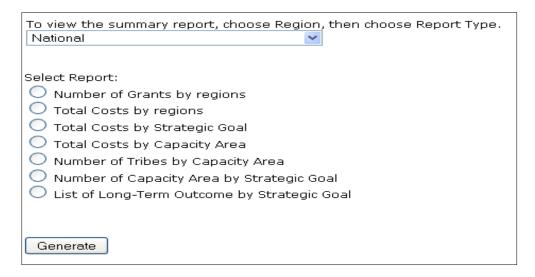


- ❖ An **End of Year Summary** text box will appear. Enter details of the issues involved in completing the year's work and lessons learned while addressing each component of your work plan
- Click the Submit button



Generating National and Regional Summary Reports

❖ To view reports for all tribes or tribes within a particular Region, select from the **Region** drop-down list.



Summary Reports

- ❖ The following Summary Reports are available for the Tribal user:
 - Number of Grants by Region
 - Total Costs by Region
 - Total Cost By Strategic Goal
 - Total Costs by Capacity Area
 - Number of Tribes by Capacity Area
 - Number of Capacity Area by Strategic Goal
 - · List of Environment Outcome by Strategic Goal

For assistance with GAP Online password resets, unlocking work plans, or other technical assistance contact:

Sherry Kimmons (kimmons.sherry@epa.gov) or Westley Foster (foster.westley@epa.gov)

MANAGING YOUR IGAP GRANT AFTER IT HAS BEEN AWARDED

- Roles
- Programmatic Conditions in Grant Agreement or Assistance Amendment
- Progress Reports
- Revisions



EPA Roles and Responsibilities

- **EPA Project Officer/Tribal Coordinator** (your primary EPA contact regarding your IGAP grant)
- **EPA Grants Specialist** (located in Seattle Region 10 office, contact regarding administrative and financial grant questions)
- EPA Las Vegas Finance Center, Marge Pumphrey
 - · Ph 702-798-2492
 - Fax 702-798-2423
- EPA Minority Business Enterprise/Woman-owned Business Enterprise (MBE/WBE) also know as Disadvantaged Business Enterprise (DBE) Coordinator, Greg Luchey
 - Ph 206-553-1141
 - Fax 206-553-4957



Project Officer Roles



- EPA's designated recipient contact
- Provide technical and programmatic assistance
- Review proposals, suggests revisions
- Monitor project progress and acceptability of programmatic performance
- Work with recipient to help identify environmental outcomes of work plans

1. The **Project Officer (PO)** monitors the progress of grant on the programmatic side. Your PO receives quarterly progress reports and reviews each of the components/commitments in your work plan to see how things are going. Typically, reports are due 30 days after the end of each fiscal quarter, though some grants have semi-annual or annual reporting requirements. Following is a description of some of your Project Officer's responsibilities:

Pre-Award:

- Preparing and submitting funding recommendations that are complete, accurate, and include work plans with clear outputs and outcomes that support EPA strategic goals.
- Your PO is responsible for working with you to insure that your work plan has meaningful tasks that are allowable under IGAP and that the budget is accurate and has enough detail to support your funding request. This process of PO applicant review, revision, resubmission, and finalization of an IGAP work plan and budget is called negotiation. The goal is to keep reviews/resubmissions to no more than three.

Post-Award:

- Providing technical assistance and acting as liaison with the recipient's project manager on all matters relating to project performance;
- Conducting baseline post-award monitoring activities;
- Elevating performance problems within EPA; and
- Documenting post-award activities in files and databases consistent with grants policy and guidance.

Close Out:

- Working to close out assistance agreements in a timely manner by certifying to the Grants & Interagency Agreement Administration Unit within 90 days of project period end date that all activities and deliverables were satisfactorily completed.
- **2.** The **Grants Specialist (GS)** in Seattle works on administrative and financial matters and can assist with those questions. You may copy the GS on reports such as the SF425 (Federal Financial Report) although the original of that report is sent to the Las Vegas Finance Center.
 - Before the grant award is made, your application, work plan and budget will be reviewed by grants administration staff for compliance with numerous administrative regulations and standards.

- After the award is made, and you have begun work on your project, your grant
 will be monitored for compliance with the various administrative terms and
 conditions that apply to your grant.
- Grants administrative staff will also process amendments to your grant agreement, if any are needed.
- When the grant period is over, grants administration staff will work with you to close out your grant.
- The name of the Grants Specialist assigned to your grant is listed on the grant award document, along with his/her contact information.
- Most importantly, the Grants Administration Unit is a valuable resource to you as a grant recipient for technical assistance as you administer your grant.
- **3. Greg Luchey** in Seattle receives Minority Business Enterprise/Woman-Owned Business Enterprise (MBE/WBE) reports (also known as Disadvantaged Businsess Enterprise (DBE) reports) annually by October 30. Even if no purchases were made from minority or woman-owned businesses, a report stating that still must be submitted.
- **4. Marge Pumphrey** at the Las Vegas Finance Center (LVFC) processes payment requests (draw downs); use the EPA Payment Request Form (EPA 190-F) shown on the next page. Requests should be **faxed** to the Las Vegas Finance Center; emails are not accepted.
 - **Advances:** Submit bi-weekly or weekly. Estimate of spending during next weekly or bi-weekly cycle (payroll, supplies, building maintenance, utilities, etc.) and make the draw down request for the total.
 - **Reimbursement requests** may also be done for funds already spent for IGAP purposes. Requests can be less frequent and in larger amounts. Keep receipts.
 - Funds are distributed by electronic funds transfer; usually takes 1-2 days to receive once requested.
 - As of October 1, 2009, Cash Transactions Reports (SF272) and final Financial Status Reports (SF269 or SF 269a) were replaced by the SF-425, Federal Financial Report, which will be due at grant close out **only** unless your grant terms and conditions state otherwise.

How to Access Your Grant Funds

Once a grant or cooperative agreement has been signed by an EPA award official and affirmed by the recipient organization, recipients are able to request funds. The

recipient may receive funds through one of two approved methods: Electronic Fund Transfer (EFT) and Automated Standard Application for Payments (ASAP).

Instructions for Electronic Funds Transfer (EFT): When funds are required by your organization, you will need to complete the EPA Payment Request Form EPA Form 190-F-04-001 Payment Request for Grants/Cooperative Agreements (PDF).

EFT recipients:

- Must have a currently affirmed/active grant with the EPA.
- Are required to have their organization's banking data on file with the Las Vegas Finance Center (LVFC). This is done by completing form <u>SF3881</u> <u>ACH Vendor/Miscellaneous Payment Enrollment Form (PDF)</u> and faxing this document to the LVFC at (702)-798-2423.
- Must be issued an EFT number by the LVFC.
- Must complete the EPA payment request form <u>EPA form 190-F-04-001</u>
 (<u>PDF</u>) and fax the document to LVFC at (702)-798-2423. Unique EPA
 programs, or those recipients permitted by LVFC (by exception only), may use
 <u>SF270</u> or <u>SF271</u> to request payment.
- For further information, please read the **EFT Recipients' Manual (PDF)**.

Instructions for Electronic Funds Transfer for Payments (ASAP): The LVFC will review each request. When the request is approved for payment, EPA will electronically transfer the funds through the U.S. Department of Treasury and the Federal Reserve for credit to the recipient's account at their designated financial institution within 3 to 5 business days following receipt and approval of the request. If the entire request or a portion of the request is rejected, the recipient will be notified by the LVFC no later than 1 workday following receipt of the request.

US Treasury Automated Standard Application for Payments (ASAP): ASAP enrollment is highly encouraged for organizations that have multiple

grants/cooperative agreements and for those with a frequent need to request funds. If your organization uses multiple bank accounts for EPA grants/cooperative agreements, you **must** enroll in ASAP. If you are interested in requesting and receiving funds paperless and electronically via ASAP, please complete the ASAP Initiate Enrollment form and fax it to LVFC at 702-798-2423.

The LVFC enters spending authorizations into the recipient's ASAP accounts in accordance with their program needs and schedules. The recipient can initiate payment requests through ASAP to meet immediate cash needs. The payment process is designed to provide federal funds to a recipient organization within 48 hours for ASAP recipients. Please refer to www.asap.gov for additional information.

ACH VENDOR/MISCELLANEOUS PAYMENT ENROLLMENT FORM

OMB No. 1510-0056 Expiration Date 06/30/93

This form is used for Automated Clearing House (ACH) payments with an addendum record that contains paymentrelated information processed through the Vendor Express Program. Recipients of these payments should bring this information to the attention of their financial institution when presenting this form for completion.

PRIVACY ACT STATEMENT

The following information is provided to comply with the Privacy Act of 1974 (P.L. 93-579). All information collected on this form is required under the provisions of 31 U.S.C. 3322 and 31 CFR 210. This information will be used by the Treasury Department to transmit payment data, by electronic means to vendor's financial institution. Failure to provide the requested information may delay or prevent the receipt of payments through the Automated Clearing House Payment System.

	AGE	NCY INFORMATIO	ON		
FEDERAL PROGRAM AGENCY					
AGENCY IDENTIFIER:	AGENCY LOCATION CODE (AL	C):	ACH FORMAT:		
			□cco+	□стх	
ADDRESS:					
CONTACT PERSON NAME:				TELEPHO	NE NUMBER:
				()
ADDITIONAL INFORMATION:					
	PAYEE/C	OMPANY INFORM	ATION		
NAME:				SSN NO.	OR TAXPAYER ID NO.
ADDRESS:				•	
CONTACT PERSON NAME:				1	NE NUMBER:
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NSN 7540-01-274-9925		3881-102		(SF 3881 (Rev 12/90)
AND A SHOP A PARTY		3441-105			Prescribed by Dangstment of Treasury

ENCY COPY

Prescribed by Department of Treasury 31 U S C 3322; 31 CFR 210

Instructions for Completing SF 3881 Form

- Agency information Section Federal agency prints or types the name and address of the Federal program agency originating the vendor/miscellaneous payment, agency identifier, agency location code, contact person name and telephone number of the agency. Also, the appropriate box for ACH format is checked.
- Payee/Company Information Section Payee prints or types the name of the payee/company
 and address that will receive ACH vendor/miscellaneous payments, social security or taxpayer
 ID number, and contact person name and telephone number of the payee/company. Payee
 also verifies depositor account number, account title, and type of account entered by your
 financial institution in the Financial Institution Information Section.
- 3. Financial Institution Information Section Financial institution prints or types the name and address of the payee/company's financial institution who will receive the ACH payment, ACH coordinator name and telephone number, nine-digit routing transit number, depositor (payee/company) account title and account number. Also, the box for type of account is checked, and the signature, title, and telephone number of the appropriate financial institution official are included.

Burden Estimate Statement

The estimated average burden associated with this collection of information is 15 minutes per respondent or recordkeeper, depending on individual circumstances. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to the Financial Management Service, Facilities Management Division, Property and Supply Branch, Room B-101, 3700 East-West Highway, Hyattsville, MD 20782 and the Office of Management and Budget, Paperwork Reduction Project (1510-0056), Washington, DC 20503.

U.S. EPA PAYMENT REQUEST

Recipient Name:		Contact Pers	son:		
Fax #:		Phone #: Email addre	SS:		
EFT#	Request #	Cash on Hand: \$			
Assistance Agreement	Account No/Activity Code (Superfund Site Specific)	\$ Amoun	Mark (X) if t Credit	Fo	r EPA Internal Use Only
I certify that to the best of my agreement and that payment	TOTAL AMOUNT REQUESTED \$ knowledge and belief the data above are is due and has not been previously requ	e correct and that a ested.	ll outlays were made	e in accordance with	n the grant conditions or other
APPROVALS:					
Recipient Ap	proving Official=s Signature			Date	Approved
EPA Certifyi	ng Officer Approval		Date Approved		EPA APPROVED AMOUNT For EPA Use Only

-114-

Information Necessary to Enroll EPA Recipients into the Treasury's Automated Standard Application for Payment (ASAP) System

Organization Name	
	Recipient Name
Organization Type	
Organization Type	Chose One of the Following:
	State Agency
	Local Government
	University/College
	State University/College
	Other Educational Organization
	Non-Profit
	For-Profit
	Indian Tribal Organization Financial Institution
DUNG	
DUNS	Dun and Bradstreet Data Universal Numbering System Number
EIN	
LIIN	Employer Tax Identification Number
POINT OF CONTACT	
	Person responsible for identifying the officials within the organization who will be needed to complete the ASAP enrollment.
	'
CONTACT'S ADDRESS	
_	
	
CONTACT'S E-MAIL	
- ···-	
CONTACT'S PHONE	

5. Roles of Others in the IGAP Program

- Private Auditors Audit companies that the Tribe hires to certify that the accounting procedures are accurate.
- EPA Financial Data Warehouse The database where EPA staff can see the draw downs and other information about the grant funds. Your Project Officer can provide you with your "IFMS document" from the online data warehouse.

IGAP Recipient Roles

- Grants Management complete programmatic and administrative tasks in work plan:
 - Track budget
 - Complete and submit forms (for IGAP proposals) and reports (IGAP quarterly progress reports; final performance report at close out of the grant; final Federal Financial Report at grant close out)
 - Complete work plan tasks and activities, provide output and deliverables
 - Keep EPA updated on changes in personnel/work plans



Programmatic Terms and Conditions

Following is a partial listing of programmatic terms and conditions. Please be sure to read your award document for a listing of the specific programmatic terms and conditions that apply to your award.

1. Periodic (Quarterly, Semiannual, Annual) Performance Reports

Periodic progress reports are due 30 calendar days after the end of the reporting period (every 3, 6, or 12 months) and may be emailed.

Reports should list each component and commitment and include brief comments in the following areas:

- (a) Compare actual accomplishments to the goals established in the work plan for the period. Note whether the original time frame will need to be modified;
- (b) Provide an explanation if established goals were not achieved;
- (c) Include additional information as needed, such as noting that actual costs were higher than originally estimated.

In addition to performance reports, notify the EPA Project Officer immediately of developments that will have a significant impact on approved work plan activities, including delays or situations that will make it difficult to complete work plan goals. Include a plan to resolve the problem, and a request for any assistance needed.

2. Final Performance Report

Another typical programmatic condition for IGAP grants is a final performance report, due 90 calendar days after closeout of the award. The report is submitted to your EPA Project Officer and may be emailed. It should generally contain the same information as progress reports, but should cover the entire project period.



3. EPA's Rights to Copyrighted Software and Written Materials Developed under Assistance Agreements

40 CFR 31.34: EPA may use for federal purposes, and authorize others to use, copyrighted works developed under an assistance agreement.

Examples of federal purpose: (1) Use by EPA and other federal employees and federal contractors; (2) Publication in EPA documents; (3) Reproduction of documents for federal archives; (4) Use by state, Tribal, and local governments that carry out delegated federal environmental programs or act as official EPA partners; (5) Limited use by other grantees to carry out federal grants.

4. Consortium Requirements

Consortia must insure that only Tribal governments eligible to receive a grant under the IGAP Program will: (1) benefit directly from the grant project and (2) receive and manage grant funds.

5. Quality Assurance Requirements

- 1) Submit quality assurance documentation to your EPA project officer within 30 days of acceptance of the agreement (or by the date negotiated).
- 2) Do not begin work involving direct measurements or data generation, environmental modeling, compilation of data from literature or electronic media, or data supporting the use of environmental technology until your project officer and the EPA Quality Assurance manager have approved the quality assurance document (see 40 CFR 31.45.) For more information on these requirements, go to http://www.epa.gov/ogd/qa.htm

6. Information Collection Requirements

- 1) Paperwork Reduction Act: If the scope of work includes a **survey**, the Paperwork Reduction Act requires EPA to get Office of Management and Budget's okay before the recipient collects information through identical questions posed to 10 or more persons (use a questionnaire or assessment instead).
- 2) If conducting a survey, provide your EPA project officer the following information: (1) a description of the information to be collected; (2) explanation of the need for the information; and (3) to whom the survey is being directed.

Award Document and Administrative Terms and Conditions

In addition to the programmatic terms and conditions shown on previous pages, there are administrative terms and conditions that apply to your assistance agreement as well. Following is an example of an award document that contains some of the most common administrative terms and conditions.

This first page of the award document contains important information, such as the grant number (Assistance ID No.), the project and budget periods of the grant, the award amount, and contact information for your Project Officer and Grants Specialist.





U.S. ENVIRONMENTAL PROTECTION AGENCY

Assistance Amendment

	ASSISTANCE ID NO.			
PRG	DOC ID	AMEND#	DATE OF AWARD	
GA -	96005201	- 2	08/08/2006	
TYPE OF ACTION		MAILING DATE		
Revision: Scope & Increase			08/15/2006	
PAYMENT METHOD:		ACH#		
			X0368	

RECIPIENT TYPE:

Indian Tribe

Send Payment Request to:

Las Vegas Finance Center FAX # 702-798-2423

RECIPIENT:

Village of Alakanuk P.O. Box 149 Anderson Street Alakanuk, AK 99554

EIN: 92-0068781

PAYEE:

Village of Alakanuk P.O. Box 149 Anderson Street Alakanuk, AK 99554

PROJECT MANAGER	EPA PROJECT OFFICER	EPA GRANT SPECIALIST
Stephanie Ayunerak P.O. Box 149 Anderson Street Alakanuk, AK 99554 E-Mail: auktc@unicom-alaska.com Phone: 907-238-3418	Adrienne Fleek 222 W. 7th Avenue, #19, AOO/A Anchorage, AK 99513 E-Mail: Fleek.Adrienne@epa.gov Phone: 907-271-6558	Tony Fournier 1200 Sixth Avenue, OMP-145 Seattle WA 98101 E-Mail: Fournier.Tony@epa.gov Phone: 206-553-1838

PROJECT TITLE AND EXPLANATION OF CHANGES

Indian General Assistance Program - Capacity Building

This amendment changes the agreement as follows: Adds \$110,000 of EPA funding, extends the project/budget period to 09/30/2007, approves the revised workplan submitted with the application signed on 05/22/2006, revises administrative conditions 2 and 3, renumbers programmatic conditions and adds programmatic condition 3.

BUDGET PERIOD	PROJECT PERIOD	TOTAL BUDGET PERIOD COST	TOTAL PROJECT PERIOD COST
10/01/2005 - 09/30/2007	10/01/2005 - 09/30/2007	\$220,000.00	\$220,000.00

BUDGET PERIOD	PROJECT PERIOD	TOTAL BUDGET PERIOD COST	TOTAL PROJECT PERIOD COST
10/01/2005 - 09/30/2007	10/01/2005 - 09/30/2007	\$220,000.00	\$220,000.00

NOTICE OF AWARD

Based on your application dated 03/31/2005, including all modifications and amendments, the United States acting by and through the US Environmental Protection Agency (EPA), hereby awards \$110,000. EPA agrees to cost-share 100.00% of all approved budget period costs incurred, up to and not exceeding total federal funding of \$220,000. Such award may be terminated by EPA without further cause if the recipient fails to provide timely affirmation of the award by signing under the Affirmation of Award section and returning all pages of this agreement to the Grants Management Office listed below within 21 days after receipt, or any extension of time, as may be granted by EPA. This agreement is subject to applicable EPA statutory provisions. The applicable regulatory provisions are 40 CFR Chapter 1, Subchapter B, and all terms and conditions of this agreement and any attachments.

ISSUING OFFICE (GRANTS MANAGEMENT OFFICE)		AWARD APPROVAL OFFICE		
ORGANIZATION / ADDRESS		ORGANIZATION / ADDRESS		
EPA Region 10 Mail Code: OMP-145 1200 Sixth Avenue Seattle, VVA 98101		U.S. EPA, Region 10 Office of Ecosystems Tribal and Public Affairs 1200 Sixth Avenue Seattle, WA 98101		
THE UNITED STATES	OF AMERICA BY THE	U.S. ENVIRONMENTAL PROTECTION AGENCY		
SIGNATURE OF AWARD OFFICIAL	TYPED NAME AND TITLE Richard Parkin, Actg Director,Office of Ecosystems Tribal and Public Affairs		DATE 08/08	
AF	FIRMATION O	AWARD		
BY AND ON BEHALF OF THE DESIGNATED RECIPIENT ORGANIZATION				
SIGNATURE	TYPED NAME AND TITLE Raymond Oney, Tribal Administrator		DATE 09/13	

Administrative Terms and Conditions

Typical administrative terms and conditions include requirements for matters such as receiving payments (Payment Information), Cost Principles allowable/unallowable program expenses), Indirect Rate, Federal Financial Reports, Audit Requirements, the Hotel and Motel Fire Safety Act, Recycled Paper, Lobbying and Litigation, Suspension and Debarment, Small and Disadvantaged Business Utilization, and Tribal Council Costs. This is a partial list of administrative terms and conditions, so be sure to read the specific terms and conditions in your award document.

Administrative Conditions

1. Payment Information

All recipients must be enrolled to receive funds electronically via the EPA-EFT Payment Process. This electronic funds transfer process was initiated by EPA in response to the Debt Collection Improvement Act of 1996, P.L. 104-134 that requires all federal payments be made via Direct Deposit/Electronic Funds Transfer(DD/EFT). By signing the assistance agreement you are agreeing to receive payment electronically.

In order to receive payments electronically, the ACH Vendor/ Miscellaneous Payment Enrollment Form (SF3881) must be completed and faxed to Marge Pumphrey at (702) 798-2423.

After reviewing and processing the SF3881, the Las Vegas Finance Center (LVFC) will send you a letter assigning you an EFT Control Number, an EPA-EFT Recipient's Manual, and the necessary forms for requesting funds and reporting purposes.

If you need further assistance regarding enrollment, please contact Marge Pumphrey at (702) 798-2492 or by e-mail to: pumphrey.margaret@epa.gov.

Any recipient currently using the Automated Standard Application for Payments (ASAP) system with another government agency should contact Marge Pumphrey at (702) 798-2492 or e-mail to: pumphrey.margaret@epa.gov.

Under any of the above payment mechanisms, recipients may request/draw down advances for their immediate cash needs, provided the recipient meets the requirements of 40 CFR 30.22(b) or 40 CFR 31.21(c), as applicable. Additionally, recipients must liquidate all obligations incurred within 90 calendar days of the project period end date. Therefore, recipients must submit the final request for payment, and refund to EPA any balance of unobligated cash advanced within 90 calendar days after the end of the project period.

2. Cost Principles/Indirect Costs Not Included (All Organizations)

The cost principles of OMB Circular A-21 (Educational Institutions), A-87 (State, Local or Indian Tribal Governments), or A-122 (Non-Profit Organizations) are applicable, as appropriate, to this award. Since there are no indirect costs included in the assistance budget, they are not allowable under this Assistance Agreement.

Cost Principles/Indirect Costs for Indian Tribal Governments

The cost principles of OMB Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments," relocated to 2 CFR Part 225, is applicable, as appropriate, to this award. If the recipient does not have a previously established indirect cost rate, the recipient must submit their indirect cost rate proposals to:

National Business Center Indirect Cost Services U.S. Department of the Interior 2180 Harvard Street, Suite 430 Sacramento, CA 95815-3317

For proposal preparation, the recipient may use the Native American Government checklists located at: http://www.nbc.gov/icstools.html#checklists.

Recipients are entitled to reimbursement of indirect costs, subject to any statutory or regulatory administrative cost limitations, if they have a current rate agreement or have submitted an indirect cost rate proposal to their cognizant federal agency for review and approval. Recipients are responsible for maintaining an approved indirect cost rate throughout the life of the award. Recipients are responsible for submitting any subsequent rate proposals to the appropriate cognizant agency no later than 180 days after the end of the recipient's fiscal year. Recipients may draw down grant funds once a rate has been approved, and only for indirect costs incurred during the period specified in the rate agreement. Recipients are not entitled to indirect costs for

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3. Federal Financial Report

FINAL FFR

The Federal Financial Report (FFR), Standard Form 425 for this award is due to EPA no later than 90 days after the budget period expires.

For agreements with multiple budget activities, separate FFRs must be provided for each of the activities, sites, or budgets, as applicable.

The Final FFR may be faxed to (702) 798-2423 or mailed to:

US Environmental Protection Agency Las Vegas Finance Center P.O. Box 98515 Las Vegas, NV 89193-8515

For additional information, please contact Marge Pumphrey at (702) 798-2492 or email: Pumphrey.Margaret@epa.gov.

EPA may take enforcement actions in accordance with 40 CFR 30.62 or 40 CFR 31.43 if the recipient does not comply with this term and condition.

4. Audit Requirements

The recipient agrees to comply with the requirements of OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

5. Hotel and Motel Fire Safety Act

Effective October 1, 1994, the recipient agrees to ensure that all conference, meeting, convention, or training space funded in whole or in part with Federal funds, complies with the Hotel and Motel Fire Safety Act of 1990.

6. Recycled Paper

ALL APPLICANTS:

In accordance with EPA Order 1000.25 and Executive Order 13101, *Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition*, the recipient agrees to use recycled paper for all reports which are prepared as a part of this agreement and delivered to EPA. This requirement does not apply to reports prepared on forms supplied by EPA, or to Standard Forms, which are printed on recycled paper and are available through the General Services Administration. Please note that Section 901 of E.O. 13101, dated September 14, 1998, revoked E.O. 12873, *Federal Acquisition, Recycling, and*



7. Lobbying

ALL RECIPIENTS:

The recipient agrees to comply with Title 40 CFR Part 34, New Restrictions on Lobbying. The recipient shall include the language of this provision in award documents for all subawards exceeding \$100,000, and require that subrecipients submit certification and disclosure forms accordingly.

In accordance with the Byrd Anti-Lobbying Amendment, any recipient who makes a prohibited expenditure under Title 40 CFR Part 34 or fails to file the required certification or lobbying forms shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such expenditure.

8. Lobbying and Litigation

ALL RECIPIENTS:

Pursuant to EPA's annual Appropriations Act, the chief executive officer of this recipient agency shall require that no grant funds have been used to engage in lobbying of the Federal Government or in litigation against the United States unless authorized under existing law. As mandated by this Act, the recipient agrees to provide certification to the award official via EPA Form 5700-53, *Lobbying and Litigation Certificate*, within 90 days after the end of project period. Recipient shall abide by its respective OMB Circular (A-21, A-87, or A-122), which prohibits the use of federal grant funds for litigation against the United States.

9. Suspension and Debarment

Recipient shall fully comply with Subpart C of 40 CFR Part 32, entitled "Responsibilities of Participants Regarding Transactions." Recipient is responsible for ensuring that any lower tier covered transaction, as described in Subpart B of 40 CFR Part 32, entitled "Covered Transactions," includes a term or condition requiring compliance with Subpart C. Recipient is responsible for further requiring the inclusion of a similar term or condition in any subsequent lower tier covered transactions. Recipient acknowledges that failing to disclose the information required under 40 CFR 32.335 may result in the delay or negation of this assistance agreement, or pursuance of legal remedies, including suspension and debarment.

Recipient may access the Excluded Parties List System at http://www.epls.gov. This term and condition supersedes EPA Form 5700-49, "Certification Regarding Debarment, Suspension, and Other Responsibility Matters."

10. Small and Disadvantaged Business Utilization Requirements (Indian Tribes)

The recipient agrees to follow the six affirmative steps stated in 40 CFR 31.36(e), 35.3145(d) or 35.6580, as appropriate, and to require its prime contractor to follow these affirmative steps if it awards subcontracts; the recipient also agrees to retain records documenting compliance.

The six affirmative steps contained in 40 CFR 31.36(e) are as follows:

- (a) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- (b) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- (c) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
- (d) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises;
- (e) Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce; and
- (f) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

The recipient agrees to submit an EPA form 5700-52A, "MBE/WBE Utilization Under Federal Grants, Cooperative Agreements and Interagency Agreements" as follows:

For grants awarded under 40 CFR Part 35, Subpart B (refer to the Regulatory Authority box shown in the middle of Page 2 of the Assistance Agreement/Amendment), reports are due annually by October 30 of each year (covers the Federal Fiscal Year October 1 - September 30).

Grants awarded under any other Regulatory Authority are due Quarterly. These reports are due beginning with the Federal Fiscal Year quarter the recipient receives the award and continuing until the project period ends. These reports must be submitted within 30 days of the end of the Federal Fiscal Quarter (due dates are January 30, April 30, July 30, and October 30).

All reports must be submitted to the Grants Administration Unit, OMP-145, 1200 Sixth Avenue, Seattle, WA 98101. For further information, please contact Greg Luchey at (206) 553-2967, email: luchey.greg@epa.gov.

In accordance with Section 129 of Public Law 100-590, the Small Business Administration and Reauthorization and Amendment Act of 1988, the recipient agrees to utilize and to encourage any prime contractors under the assistance agreement to utilize small businesses located in rural areas to the maximum extent possible through the use of the six affirmative steps.

11. Payment to Consultants

EPA participation in the salary rate (excluding overhead and travel) paid to individual consultants retained by recipients or by a recipient's contractors or subcontractors shall be limited to the maximum daily rate for Level IV of the Executive Schedule, to be adjusted annually. This limit applies to consultation services of designated individuals with specialized skills who are paid at a daily or hourly rate. As of January 1, 2007, the limit is \$557.28 per day \$69.66 per hour. This rate does not include transportation and subsistence costs for travel performed (the recipient will pay these in accordance with their normal travel reimbursement practices).

Subagreements with firms for services which are awarded using the procurement requirements in 40 CFR Parts 30 or 31, as applicable, are not affected by this limitation unless the terms of the contract provide the recipient with responsibility for the selection, direction, and control of the individuals who will be providing services under the contract at an hourly or daily rate of compensation. See 40 CFR 30.27(b) or 40 CFR 31.36(j)(2), as applicable, for additional information.

NOTE: For future years' limits, the recipient may find the annual salary for Level IV of the Executive Schedule on the following Internet site: http://www.opm.gov/oca. Select "Salary and Wages", and select "Executive Schedule". The annual salary is divided by 2087 hours to determine the maximum hourly rate, which is then multiplied by 8 to determine the maximum daily rate.

12. Tribal Council Costs

With regard to payments to members of the Tribal Council, OMB Circular A-87, Attachment B, paragraph 19, provides that general costs of government are unallowable, and subparagraph 19(a)(2) specifically includes in this prohibition salaries and expenses of Tribal councils whether incurred for purposes of legislation or executive direction. At the same time, however, A-87 includes other provisions which may or may not allow payment of grant funds to Council members:

- (a) Paragraph 2 provides that costs incurred by advisory councils are allowable where authorized in advance by the awarding agency.
- (b) Paragraph 32 provides that costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill, and who are not officers or employees of the governmental unit, are allowable.
- (c) Paragraph 27 provides that meetings and conferences, where the primary purpose is the dissemination of technical information, are allowable.
- (d) Paragraph 19b. provides that for federally-recognized Indian Tribal governments, the portion of salaries and expenses directly attributable to managing and operating Federal programs by the chief executive and his staff is allowable.

Any costs pertaining to the Tribal Council must be in accordance with OMB Circular A-87. The recipient should refer to the entire paragraphs cited above and A-87 in its entirety because the above are excerpts only, and other provisions could affect the allowability of costs. Documentation must be kept in your records as to how any of those costs charged to this grant fit with the above mentioned





Periodic (Quarterly) Progress Reports

To create a progress report:

- Review current work plan components and commitments.
- Review the IGAP activities log (paper or electronic) that you have been filling out on a daily basis.
- Use either the recommended Word periodic (quarterly) report template or enter your report directly in GAP Online (see pages 91 97).
- GAP Online reporting entry is strongly recommended; it will be required in the near future.

Completing a Word Format Progress Report

- Fill out the first page of the quarterly report, which includes your basic contact and identification information. Be sure to enter your grant number (you can get this from your award document), the reporting quarter (for example, the first quarter of FY11 would be 10/1/10 12/31/10). Your project officer's information should also be entered.
- In the Comparison of Amount Budgeted vs. Amount Spent table, EPA is looking for total cumulative amounts for each field, from the very beginning of the grant through the end of the reporting period (most commonly a quarter). You may find it helpful to request a copy of your Tribe's data from EPA's financial database (IFMS document--it includes award funds received, draw downs made along with dates, and other financial information about the grant) from your project officer. You (or your financial officer) can compare this to your Tribe's financial records and complete the Comparison section of the report.

- Component and commitment titles and end dates can be copied from the work plan you are reporting on and pasted into the appropriate fields in the quarterly report (Components go in the fields under the Component column in the quarterly report and commitments are entered in the fields under the Task column; End Dates from the work plan are entered in the fields under the Timeframe column in the quarterly report). Be sure to indicate a new Timeframe in your report if necessary (for example, if you are ahead of or behind schedule) and provide an explanation under Comments.
- You can also copy Outputs/Deliverables, Estimated Component Cost, and Estimated Component Work Years from the work plan and enter them in the appropriate fields of your report.
- **Outputs** (deliverables) such as newsletters, reports, photos, solid waste management plans, etc. may be attached and emailed along with quarterly reports (or any time) or they can be mailed as hard copies. You can note in your report if an output is complete and if it's included with the report under the Outputs column.
- **Outcomes** are long term goals that may or may not be completed during the project period. You can copy them from the work plan and paste them in the Outcomes column in quarterly reports. Please note if an outcome has been achieved.
- **Status** should describe where things stand with completing a particular work plan commitment. If a task has been completed, state that along with a date, in the Status field. If no activity took place on a task during the reporting quarter, write "No Activity" and provide an explanation under Comments. Do not use "Ongoing" as a status—it is too vague.
- The Comments field should also be used to provide detail in general about task accomplishments and challenges.

Word Version IGAP Quarterly Report Template (First Page)

		exp			
	QUARTERLY REPORT				
	Is this contact information new? Yes				
Recipient Name	Native Village of Raven	info			
Recipient Environmental Contact	Joe Raven				
ecipient Phone Number 907-123-4567					
Grant Name	Indian Environmental General Assistance Program (
Grant Number and Project Period	GA-98040106-0				
Reporting Quarter/Dates	10/1/07 – 12/31/07				
EPA's Project Officer Name and Address	Sherry Kimmons, Tribal Coordinator U.S. Environmental Protection Agency Alaska Operations Office 222 West 7 th Avenue, #19 Anchorage, AK 99513				

Most of the information in this table is self explanatory. Enter the correct reporting period (usually a quarter), the grant number (you can find this on the award document), and your project officer's information.

For this table, fill in total cumulative amounts from the beginning of the grant through the end of a reporting period (usually a quarter) for each field. You may want to request a copy of a document with your Tribe's draw downs and other financial information for your IGAP grant program (IFMS document)..

Comparison of Amount Budgeted vs Amount Spent

Please describe now much you budgeted versus now much money you actually need to complete activities			
Total Grant Amount Awarded: \$220,000	Amount Spent: \$76,450		
SEE "Total Budget Period Cost" block on How much money have			
Grant Award Agreement for this figure	you actually spent?		
Funds Necessary to Complete this Project: \$143,550 How much money will it cost to complete this project?	Unexpended Funds Remaining in the Grant: \$143,550 How much money remains in your grant?		
Funds Requested from EPA to Date: \$78,872 Cumulative; what is the total amount requested from EPA? Amount & Date of Last Request for Reimbursement/Advance Payment: \$5,498 12/26/07			
Additional Information			

Issues you need the EPA Project Officer to respond to quickly:

Word Version Work Plan Template Indian General Assistance Program 2011_{Review work plan-components &} **Tribe: Village Council** commitments; they must be listed in Region: 10 your quarterly report and can be Work Plan Period Begin: October 1, 2011 End: September 30, 2012 copied from the work plan. Work Plan Component 1: Solid Waste Management and Pollution Prevention Personnel: Environmental Coordinator(EC), Environmental **Assistant (EA)** Primary Capacity Area Developed (check one) 4dministrative Enforcement/Compliance Technical X Communication Solid/Hazardous Waste Implementation Legal FTE: Environmental Coordinator(EC), Tribal Administrator (TA) **Intermediate/ Long-term Outcomes** The community is now better able to protect the environment through the opening and management of a new landfill.

- The Tribal environment has become cleaner and healthier due to increased community awareness.

Short-term/Intermediate Outcomes

- Community meetings held, community members are aware of environmental issues and risks.
- Training provides technical knowledge and skills, enableing staff to better protect the environment.

ESTIMATED COMPONENT COST: \$30,000				ED COMPONENT WORK YEARS: 0.5	
	COMMITMENTS *	CAPACITY AREA	COST (optional)	END DATE	OUTPUTS AND DELIVERABLES
1.1	Using the best available data from the waste hauling contractor and Tribal records, the recycling rate for the Tribal administrative building will be evaluated on an annual basis.	Technical		6/30/12	Rates of the Tribal recycling program will be included in routine reports to Tribal Council and the IGAP quarterly reports.
1.2	Environmental staff will attend training and conferences on recycling and solid waste issues related to project goals and provide trip/meeting reports to the Tribal Council.	Technical		9/30/12	Trip/meeting report copies.
1.3	Environmental staff will prepare/disseminate outreach materials (articles in Tribal newsletter, flyers for Tribal member residences, website postings, etc.) on the status of recycling and collection/disposal options available to community members.	Communication		9/30/12	Copies of newsletters.
<u>EPA</u>	EPA Use Only EPA Strategic Plan				

Goal X:

Objective X.X:

materials (articles in Tribal

newsletter, flyers for Tribal member

collection/disposal options available

residences, website postings, etc.)

on the status of recycling and

to community members.

Word Version IGAP Quarterly Report Template – Component & Commitment Entry

Component #1: Solid Waste Management and Pollution Prevention Components & commitments can be copied from your work plan and pasted into the appropriate fields Estimated Costs: \$88,000 of your quarterly report, as can Outputs, Outcomes, **Actual Costs:** and Timeframe (same as End Date in the work plan). Estimated Work Years: 0.40 (2 year award 0.2 FTE/vear) Task[◆] **Timeframe** *Status *Comments **Outputs Outcomes** 1.1 Using the best available data Data is being Rates of the Tribal Annually – The waste hauling from the waste hauling contractor by 9/30/08 compiled recycling program will be contractor and and 9/30/09 cumulatively and will included in routine reports and Tribal records, the recycling Tribal Council will rate for the Tribal administrative be available for final to Tribal Council and the discuss rates in building will be evaluated on an IGAP quarterly reports. report. June 2008. annual basis. Trip/meeting report copies 1.2 Environmental staff will attend Quarterly Staff attended The community Environmental training and conferences on ATCEM/IGAP attached. Coordinator is now better recycling and solid waste issues training on 10/15 able to protect attended sessions related to project goals and provide 10/19/07. the environment on landfill planning trip/meeting reports to the Tribal through the and recycling. Council. opening and management of a new landfill. 1.3 Environmental staff will Monthly Latest newsletter Copy of newsletter The Tribal Many positive prepare/disseminate outreach was mailed out on attached. comments about environment has

12/15/07.

become cleaner

to increased

community

awareness.

and healthier due

the newsletter

meeting

(12/28/07).

were received at

the last community

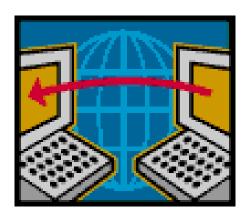
^{*}As required under 40 CFR 31.40 and 35.515, recipients should discuss accomplishments versus work plan commitments; cumulative effectiveness of the work performed under all work plan components; existing and potential problem areas, including slippage if commitment is not met; and suggestions for improvement, including, where feasible, schedules for making improvement and, when appropriate, analysis and explanation of cost overruns. This information can be presented in the "status" and "comments" columns

Programmatic Advanced Post Award Monitoring (APAM)

Each year, EPA Project Officers are required to conduct one or more programmatic APAM reviews. The purpose of a programmatic APAM review is to document: 1) any equipment purchased under the award; 2) work plan and accomplishments; 3) adequacy of funds remaining to complete the project; 4) compliance with programmatic terms and conditions; and 5) insuring that all programmatic, statutory, and regulatory requirements are being met. An APAM review may be conducted as either a desk or site review.

The Project Officer will send a letter to the Tribal government, suggesting a date for an APAM site visit or noting that an APAM desk review will be conducted. An electronic copy of the letter is also sent to IGAP staff. A mutually agreeable date and time for the review is then determined.

When the review takes place, the Project Officer and IGAP staff members discuss progress on the Tribe's current IGAP work plan, including previous recommendations, accomplishments, and challenges. Following the APAM review, the Project Officer writes a summary report noting progress and challenges, and sometimes including program recommendations. The report may include requiring a written action plan that details how the Tribe will implement those recommendations. The report is mailed or emailed to the Tribal Council, the Tribal IGAP staff, the Tribe's Grants Specialist, and the Grants and Interagency Agreement Administration Unit (GIAAU). The Project Officer will follow up on the status of report recommendations.



Closing Out Your IGAP Grant What to do at the end of your IGAP grant...



- 1. Note the dates in the project period and budget period in your grant agreement.
- 2. During the last 3 months of the grant, begin assembling documents for your close out.
- 3. You will receive a letter about a month prior to the end of your project period and budget period from GIAAU to request that you begin preparing your close out.
- **Often the end of your project period will coincide with the end of the federal fiscal year: September 30.
- 4. Your close out must be completed NO LATER than 90 days after the end of the project period.

Example: for grants that coincide with the federal fiscal year, those ending September 30 must be closed by December 30. All project related work must stop on end date of the project period (no new work or contracting is allowed after the end of the project period).

Code of Federal Regulations [Revised July 1, 2006] Title 40, Volume 1, Subpart D: After-the-Grant Requirements Sec. 31.50 – Close Out

- (a) General: EPA will close the award when all applicable administrative actions and all required work of the grant have been completed.
- **(b) Reports:** Within 90 days after the end of the grant, the grantee must submit all financial, performance, and other reports required as a condition of the grant. (The Federal Financial Report (SF425) has replaced the final Financial Status Report and the Cash Transactions Report.)

You will need to complete:

- (1) Final performance or progress report.
- (2) Federal Financial Report (SF 425).
- (3) Final request for reimbursement, if applicable.
- (4) Invention disclosure report, if applicable.
- (5) Federally-owned property report (if applicable; property "borrowed" for this project, as distinct from that acquired with grant funds; disposition instructions must be requested from EPA if the property is no longer needed).
- **(c)** Cost adjustment: EPA will make upward or downward adjustments to the funds left in your IGAP treasury account for allowable costs within 90 days after receipt of reports mentioned above.

(d) Cash adjustments:

- (1) EPA will make prompt payment to the grantee for allowable reimbursable costs.
- (2) The grantee must return to EPA any balance of unobligated cash advanced that is not authorized to be retained for use on other grants.
- **1. Final Payment (draw down) Request:** The final payment request must be submitted to the **EPA Las Vegas Finance Center** (LVFC) no later than 90 days after the end of the agreement (if applicable).

Make the request to:

US EPA, LVFC, PO Box 98515, Las Vegas, NV 98193-8515

Fax: 702-798-2423

2. Federal Financial Report - FFR (SF425): The FFR is used *only* at close out, unless specified otherwise in the Terms and Conditions of your award document. Program income: be sure to inform your project officer before the end of the project period if there is program income.

Submit the Final FFR to the Las Vegas Finance Center:

US EPA, LVFC, PO Box 98515, Las Vegas, NV 98193-8515

Fax: 702-798-2423

and (optional) to your Project Officer (for file).



3. Minority/Women's Business Enterprise Utilization (MBE/WBE) Report: (In your grant agreement this is referred to as Small and Disadvantaged Business Utilization Requirement) A MBE/WBE report (EPA Form 5700-52A) is required to report whether or not funds were spent for supplies, equipment, or contractual services from minority or woman-owned businesses during the life of the grant.

The final MBE/WBE report should include **only those items not previously reported or a negative report** if no funds were spent during the reporting period. **Submit the final MBE/WBE to:**

Greg Luchey, Grants Specialist, EPA Region 10, Grants and Interagency Agreement Administration Unit, OMP-145, 1200 Sixth Avenue, Suite 900, Seattle, WA 98101 Fax: 206-553-4957

And (optionally) to your Project Officer.



5. Inventory Report for Equipment, Supplies, Federally Owned Property, and/or Real Property:

a. **Equipment** (if applicable)

If any *equipment* was acquired under the agreement, an inventory report is required (no standard format).

Equipment = any tangible, non-expendable, property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit (including shipping costs).

Disposal options allow the recipient to use the equipment on the same activity or another federally sponsored project. If not using one of these disposal options, EPA must be paid for its share of the current market value, less administrative selling expenses.

An Equipment Inventory Report should include:

A complete description of each piece of equipment, Original date of purchase, Original cost, Estimate of the current value and condition, and Method of disposal.

b. Supplies (if applicable)

An inventory list and method of disposal is required if the *total* value of unused supplies for the project *exceeds* \$5,000.

Disposal options: the recipient may use the supplies for the same activity or another federally sponsored project. Otherwise, EPA must be compensated for its share.



c. Supplies Inventory Report should include:

A complete description of all supplies; Original date of purchase; Original cost; Estimate of the current value and condition; and Method of disposal.

d. Federally Owned Property (if applicable)

If any federally owned property was used the grantee must:

- 1. Insure proper disposition of the property, and
- 2. Send an inventory report.

An Inventory Report should include:

- A description;
- Decal number;
- Current condition of the property.

e. <u>Real Property (i.e. land, land improvements, structures) (if applicable)</u>

Get written approval from EPA for the use of real property in other federally sponsored projects or request disposition instructions (retain and compensate EPA; sell and compensate EPA; transfer title to EPA or 3rd party) when real property is no longer needed for the originally authorized purpose.

Submit Inventory Report(s) (federally owned property, supplies) to:

Your Grants Specialist, EPA Region 10, Grants and Interagency Agreements Administration Unit, Suite 900, OMP-145, 1200 Sixth Avenue, Seattle, WA 98101, Fax: 206-553-4957

6. Invention Disclosure Report (if applicable)

If any inventions were developed under your award, submit an invention disclosure report containing (no standard format):

- Name of the invention
- · Intended use
- Cost
- Market value
- Ownership rights

Submit Invention Disclosure Report to:

Your Grants Specialist,

EPA Region 10, Grants and Interagency Agreements Administration Unit, Suite 900, OMP-145,

1200 Sixth Avenue, Seattle, WA 98101

Fax: 206-553-4957

7. Final Technical/Performance Report

No specific format is required for the final report, but it should include:

- **a.** A report back on *accomplishment of the goals* in your work plan; all components/commitments for each year should be listed and discussed.
- **b.** Accomplishments based upon types of *capacity building* (i.e. financial, administrative, legal, etc.).
- **c.** Accomplishments based upon types of **solid/hazardous waste implementation** (i.e. recycling center, village clean up, etc.).
- **d.** The *outcomes that resulted*: For instance Is the Tribe better off now than before the IGAP program (increased environmental awareness, issues being resolved, etc.)?

Content for the Final Performance Report should cover:

- Were original work plan activities carried out as planned? If not, please explain.
- Were there obstacles to completing your goals that prevented you from finishing work plan activities?
- Are you now better able to address former obstacles?
- Do you feel that EPA has provided you with enough technical assistance and guidance on issues important to you?
- Discussion of existing and potential problem areas.
- Suggestions for improvement, including time frames.

Big Picture

This report will provide insight into your community for EPA, and it can also be used by your Tribal Council to identify future directions, provide a record of accomplishments, and assist you in developing future funding proposals.

8. Outputs/Deliverables

Please send copies of all outputs/ deliverables created with your IGAP funds to your project officer.



Deliverables/outputs could be:

- Environmental newsletters
- Reports on internal management systems
- MOAs/MOUs, ordinances
- Tribal Environmental Agreements (TEAs)
- Quality Assurance Project Plans (QAPPs)
- Baseline water or air quality data, etc.

Email or mail 7. Final Technical/Performance Report and 8. Outputs/Deliverables to your Project Officer:





Project Officer's Name, US EPA, Region 10 Alaska Operations Office 222 W. 7th Ave., Box 19 Anchorage, AK 99513-7588 Fax: 907-271-6340

Or

Project Officer's Name
US EPA, Region 10
Office of Ecosystems, Tribal and Public Affairs
1200 Sixth Avenue, Suite 900, TTAU-085
Seattle, Washington 98101
FAX: (206) 553-0151

40 CFR 31.32 Retention and Access Requirements for Records.

After your grant closes, you will need to keep your records for a period of time, generally for three years from the date that you submitted your last expenditure report for that period. For more details on the retention schedule, please visit http://edocket.access.gpo.gov/cfr_2004/julqtr/pdf/40cfr31.42.pdf.

(b) Length of retention period.

(1) Except as otherwise provided, records must be retained for three years from the starting date specified in paragraph (c) of this section.

(c) Starting date of retention period:

(1) *General*. When grant support is continued or renewed at annual or other intervals, the retention period for the records of each funding period starts on the day the grantee or subgrantee submits to the awarding agency its single or last expenditure report for that period. However, if grant support is continued or renewed quarterly, the retention period for each year's records starts on the day the grantee submits its expenditure report for the last quarter of the Federal fiscal year. In all other cases, the retention period starts on the day the grantee submits its final expenditure report. If an expenditure report has been waived, the retention period starts on the day the report would have been due.

Administrative Grants Management: Fiscal Management

- Time –Make an accurate estimate of the time it will take you to write your work plan and budget.
- Accuracy The work plan costs (Estimated Component/Commitment Costs), the budget, and the SF424a must match.
- The costs, although estimates, should be reasonable and as accurate as possible.
- Results should be defined in your outputs (deliverables) and outcomesmeasureable results of your work plan.

To continue your IGAP program, you will need to:

- Have policies and procedures in place.
- Follow procurement procedures.
- Keep documentation in electronic and paper files.
- Document the outputs and outcomes/environmental results that are achieved.

New and Continuing Grants: Reminders

- An assistance agreement is a legally binding document.
- When you apply, you are agreeing to observe all regulations, terms, and conditions.
- Required reports and certifications must be submitted; compliance is expected and subject to review.

These circulars and regulations address the basic issues of IGAP grants:

OMB and Budget Circulars:

- 2CFR Part 225 (formerly A-87 Cost Principles)
- A-133 Audit Requirements

EPA Regulations:

- 40 CFR Part 31
- 40 CFR Part 35

General Areas Covered:

Management Capabilities:

- Personnel Policies
- Record Keeping Procedures
- Performance Reporting

Financial Management Standard:

- Accounting and Financial Reporting Systems
- Internal and Budget Controls

Procurement Standards:

- Procurement Procedures
- Standards of Conduct

Property Management Systems:

- Supplies and Equipment
- Inventory Controls
- Loss Prevention/Insurance Coverage
- Disposition Policies

Tribes' Responsibilities: Audits and Reviews

What are audit requirements?

If you are a recipient of federal assistance funds and spend more than \$500,000 of those funds in a year, you are required to conduct an audit. You are responsible for contracting with a qualified auditor and following appropriate procurement regulations. Once you have an auditor, you and your auditor should see OMB Circular A-133 for more details on the requirements. Accountants who conduct these audits should be familiar with the requirements and methods for conducting a single audit.

May I charge audit costs to my grants?

Yes, you may use grant funds to pay for single audits. The costs should be apportioned equitably to your various assistance agreements. One possible method of dividing the cost of an audit between programs that involve about the same amount of funding follows: If you currently have five federal assistance agreements and the cost of your Single Audit is \$10,000, \$2,000 is charged to each agreement.

Other methods using percentages may also be used when grants have different values. One grant may involve \$400,000, while another might be only \$100,000. The greater the expenditures for a given grant, the more work the auditing of those expenditures would presumably involve. Here's an example of how a percentage application may work:

Grant Program	Fiscal Year Expenditures	% age
EPA	210,000.00	33.9%
DHS	140,000.00	22.6%
DOI	270,000.00	43.5%
Total	620,000.00	100.0%
Audit Cost	28,000.00	
	st Based On Expend tures Multiplied By A	
EPA	9,483.87	33.9%
DHS	6,322.58	22.6%
DOI	12,193.55	43.5%
Total	28,000.00	100.0%

If you have an indirect rate, then it would cover the audit expense, shared among programs according to their base funds. If you have questions on how to divide audit costs among different programs, contact your EPA Grants Specialist.

What happens after the audit?

The auditor will provide the audit report to you. You are required to submit the auditor's report and relevant forms and data to the designated clearinghouse within nine months of the end of the fiscal year being audited.

If there are any findings which involve EPA assistance agreements, a copy of the report will be provided to the EPA Office of Inspector General (OIG). The OIG will then review the report and pass it along to the appropriate office for follow up. In Region 10, the Grants & Interagency Agreement Administration Unit handles audit follow up.

What will the audit report contain?

The audit report may include findings such as areas in administrative and financial management systems, policies/procedures, and documentation of expenditures that can be improved. The report may also identify questionable

costs encountered during the course of the review. The report will make recommendations for improvement.

EPA offices are required to follow up with recipients on all findings. As the recipient of federal funds, you are responsible for adding or revising policies and procedures identified in the audit report. EPA Region 10 will follow up with you in writing about the corrective actions you have taken or plan to take.

What is involved in following up on single audit report findings?

Depending on your response, there may be further follow up. If questioned costs are involved, you may be asked to provide documentation to support those costs. If costs are disallowed, you will be asked to repay the disallowed amounts. You will have the right to appeal any such actions.

What kinds of documentation might be requested?

The types of documentation asked for will depend on the types of findings. It may be as simple as an action plan for resolving administrative issues, or you may be asked for documentation to support questioned costs.

What is an OIG audit?

The Office of the Inspector General of any agency that has supplied you with funds may conduct audits of their assistance agreements with you.

Why would an OIG audit be conducted?

Such audits are scheduled as needed for a variety of reasons, which may not have anything to do with your management of particular grants or your administrative systems. For instance, this type of audit may be part of a wider review of a particular program.

Is there follow up to an OIG audit?

There may be. Follow up on an EPA OIG audit will depend on the reason for the audit and the type of findings, if any. The Region 10 Grants & Interagency Agreement may or may not be involved.

Administrative Grants Management: Administrative Advanced Post-Award Monitoring (APAM) Reviews

Why are reviews conducted?

Because a significant portion of EPA's annual budget is spent in the form of assistance to recipients, EPA is required to conduct post-award reviews of a portion of its assistance agreements and assistance recipients each year. **These reviews are not audits.**

How are recipients selected for review?

A statistical sampling method is used. Annual selection of review candidates from non-profit recipients is required. All other categories of recipients (state and local governments, Tribal entities, universities, etc.) are reviewed every other year.

How are the reviews conducted?

Most are desk or off-site reviews. The Grants & Interagency Agreement Administration Unit contacts recipients to notify them that they have been selected and provides a questionnaire to be completed and submitted. Questionnaire responses are used for "transaction testing," to determine if policies and procedures are being followed and whether adequate documentation is being maintained. A conference call may be arranged between key members of your organization and EPA staff to discuss the review and to fill in missing information.

What kind of documentation will I be asked to provide?

- Completed questionnaire.
- Copies of certain policies and procedures, which will be reviewed for compliance with program requirements.
- Source documentation for up to three funds draw downs from the previous year to the present time.

• Documentation covers: personnel costs, travel costs, and procurement costs. It may also include copies of timesheets, travel requests and vouchers, and invoices for procured goods and services.

What will the cost documentation be used for?

Cost documentation will be used for "transaction testing," or selecting and reviewing invoices, bills, payments, time sheets, etc. to determine if policies and procedures are being followed, and whether adequate documentation is being maintained.

What is the other way a review might be conducted?

On-site visits conducted by an EPA contractor is an alternative administrative review option. Initial contact is from EPA to work out review details. You must complete and submit a questionnaire before the review is scheduled. You and the EPA contractor will work together directly. A few on-site reviews are done directly by staff from the Grants & Interagency Agreement Administration Unit.

What will happen during an on-site review?

An entrance conference with key staff will be held to explain how the review will be conducted and to answer any questions the Tribe may have. A reviewer will look at policies and procedures, and conduct some transaction testing. When the review is complete, an exit conference is held to discuss preliminary findings and next steps. Throughout the review, you will have plenty of opportunity for questions and discussion, and to receive technical assistance, if needed.

What happens after an administrative review?

The process is the same for both desk and on-site reviews. The reviewer drafts a summary report describing apparent problems, and makes correction recommendations. A copy of draft report is provided to your organization for response, and your response is incorporated into final report. Based on the report, the Region 10 Grants & Interagency Agreement Administration Unit may follow up with you on any significant issues raised.



Enforcement

Section 31.43, Enforcement Process

Enforcement activities may take place because of technical issues, poor performance, or criminal matters. The sequence of enforcement activities begins with informal enforcement (conversations, phone calls, and emails between the recipient, project officer, and Grants & Interagency Agreement Administration Unit), and may be followed by a warning letter. If the recipient is nonresponsive, formal enforcement activities will be initiated.

Remedies for noncompliance

If a recipient or subrecipient fails to comply with any term of an award, whether stated in a federal statute or regulation, an assurance, in a state plan or application, a notice of award, or elsewhere, the awarding agency may take one or more of the following actions, as appropriate:

- (1) Temporarily withhold cash payments pending correction of the deficiency by the recipient or subrecipient;
- (2) Disallow (that is, deny both use of funds and matching credit for) all or part of the cost of the activity or action not in compliance;
- (3) Wholly or partly suspend or terminate the current award for the recipient's or subrecipient's program; EPA can also wholly or partly annul the current award for the recipient or subrecipient's program;
- (4) Withhold further awards for the program; or
- (5) Take other remedies that may be legally available, such as hearings and appeals. In taking an enforcement action, the awarding agency will provide the recipient or subrecipient an opportunity for a hearing, appeal, or other administrative proceeding to which the recipient or subrecipient is entitled.

Suspension and termination. Costs to the recipient or subrecipient resulting from obligations incurred by the recipient or subrecipient during a suspension or after termination of an award are not allowable unless the awarding agency expressly authorizes them in the notice of suspension or termination or subsequently. Other recipient or subrecipient costs during suspension or after termination which are necessary and not reasonably avoidable are allowable if:

- (1) The costs result from obligations which were properly incurred by the recipient or subrecipient before the effective date of suspension or termination, are not in anticipation of it, and, in the case of a termination, are noncancellable, and
- (2) The costs would be allowable if the award were not suspended or expired, normally at the end of the funding period in which the termination takes effect.

Relationship to Debarment and Suspension

The enforcement remedies identified in this section, including suspension and termination, do not preclude the recipient or subrecipient from being subject to "Debarment and Suspension" under E.O. 12549 (see Sec. 31.35).

Roles in an Enforcement Action

Several EPA staff members may be involved in an enforcement action, including the recipient's Tribal Coordinator/Project Officer, Grant Specialist, the EPA R10 Enforcement Officer, and an Appeals Board. Peer assistance providers or regional non-profit Tribal consortia may provide additional technical assistance to the recipient.



Sec. 31.12 Special Award or Subaward Conditions for "High Risk" Recipients

Occasionally, a recipient or subrecipient may be considered "high risk" if an awarding agency determines that a recipient or subrecipient:

- (1) Has a history of unsatisfactory performance;
- (2) Is not financially stable;
- (3) Has a management system which does not meet the management standards set forth in 40 CFR Part 31;
- (4) Has not conformed to terms and conditions of previous awards; or
- (5) Is otherwise not responsible. If the awarding agency determines that an award will be made, special conditions and/or restrictions that correspond to the high risk condition will be included in the award.

Special conditions or restrictions may include:

- (1) Payment on a reimbursement basis;
- (2) Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given funding period;
- (3) Requiring additional, more detailed financial reports;
- (4) Additional project monitoring;
- (5) Requiring the recipient or subrecipient to obtain technical or management assistance; or
- (6) Establishing additional prior approvals.

If an awarding agency decides to impose such conditions, the awarding official will notify the recipient or subrecipient as early as possible, in writing, of:

- (1) The nature of the special conditions/restrictions;
- (2) The reason(s) for imposing them;
- (3) The corrective actions which must be taken before they will be removed; the time allowed for completing the corrective actions; and
- (4) The method of requesting reconsideration of the conditions/ restrictions imposed.

Section 31.70, Disputes

Disagreements should be resolved at the lowest level possible. If an agreement cannot be reached, the EPA disputes decision official will provide a written final decision. The EPA disputes decision official is the individual designated by the award official to resolve disputes concerning assistance agreements.

The disputes decision official's decision will constitute final agency action unless a request for review is filed by registered mail, return receipt requested, within 30 calendar days of the date of the decision.

- (1) For final decisions issued by an EPA disputes decision official at Headquarters, the request for review must be filed with the Assistant Administrator responsible for the assistance program.
- (2) For final decisions issued by a regional disputes decision official, the request for review must be filed with the Regional Administrator. If the Regional Administrator issued the final decision, the request for reconsideration must be filed with the Regional Administrator.

The request must include:

- (1) A copy of the EPA disputes decision official's final decision;
- (2) A statement of the amount in dispute;
- (3) A description of the issues involved; and
- (4) A concise statement of the objections to the final decision.

The disputant(s) may be represented by counsel and may submit documentary evidence and briefs for inclusion in a written record. Disputants are entitled to an informal conference with EPA officials. Disputants are entitled to a written decision from the appropriate Regional or Assistant Administrator. A decision by the Assistant Administrator to confirm the final decision of a Headquarters disputes decision official will constitute the final Agency action.

A decision by the Regional Administrator to confirm the regional disputes decision official's decision will constitute the final Agency action. However, a petition for discretionary review by the Assistant Administrator responsible for the assistance program may be filed within 30 calendar days of the Regional Administrator's decision. The petition must be sent to the Assistant Administrator by registered mail, return receipt requested, and must include:

- (1) A copy of the Regional Administrator's decision; and
- (2) A concise statement of the objections to the decision.

If the Assistant Administrator decides not to review the Regional Administrator's decision, the Assistant Administrator will advise the disputant(s) in writing that the Regional Administrator's decision remains the final Agency action.

If the Assistant Administrator decides to review the Regional Administrator's decision, the review will generally be limited to the written record on which the Regional Administrator's decision was based. The Assistant Administrator may allow the disputant(s) to submit briefs in support of the petition for review and may provide an opportunity for an informal conference in order to clarify technical or legal issues. After reviewing the Regional Administrator's decision, the Assistant Administrator will issue a written decision which will then become the final Agency action.

Reviews may not be requested for:

- (1) Decisions on requests for exceptions under Sec. 31.6;
- (2) Bid protest decisions under Sec. 31.36(b)(12);
- (3) National Environmental Policy Act decisions under part 6;
- (4) Advanced wastewater treatment decisions of the Administrator; and

(5) Policy decisions of the EPA Audit Resolution Board.

EPA Administrative Grants Management Contacts

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