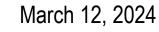
CCG Federal Grants Compliance and Program Evaluation

Key requirements and compliance considerations for federal awards

Community Change Technical Assistance **WEBINAR SERIES**







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- Elige español
- (Opcional) Para escuchar solo el idioma interpretado, haga clic en Silenciar audio original
- Debe unirse al audio a través del audio/VoIP de su computadora. No puede escuchar la interpretación de idiomas si utiliza las <u>funciones de audio</u> de acceso telefónico o <u>llámeme</u> por teléfono
- Como participante que se une a un canal de idioma, puede transmitir nuevamente al canal de audio principal si activa el audio y habla





Disclaimer: This webinar is designed to describe and clarify aspects of the Community Change Grants Program Notice of Funding Opportunity (NOFO). As an EPA technical assistance provider for this program, EnDyna, and its subcontractors, strive to present accurate information and technical assistance about the NOFO. However, none of the statements, advice, or opinions made by EnDyna or its subcontractors during this webinar constitute official EPA advice, interpretations, or positions.

In addition, EnDyna and its subcontractors will not provide any legal advice or interpretations during the webinar. Any legal issues will be sent to EPA for review. You are also free to contact your own outside counsel for legal advice. During this webinar, the presenters will not give individualized advice on specific applications, the merits of specific applications, or how an application may be evaluated and scored by EPA. If you need individualized technical assistance, please visit communitychangeta.org for further information.





Participant Q&A: Please use the Q&A function for your comments. We will attempt to answer as many questions as we can, but questions specific to an individual applicant or project will be addressed through individual TA.

EPA is regularly updating the *Frequently Asked Questions— Community Change Grants NOFO* (found on the EPA's CCG Website <u>https://www.epa.gov/inflation-reduction-act/inflation-reduction-act-community-</u> <u>change-grants-program</u>).

No Soliciting will be allowed.







About This Webinar Series

CCG Federal Grants Requirements and Program Evaluation Key requirements and compliance considerations for federal awards

The CCG Program Offers:

- ✓ Unprecedented Opportunity: Reshape disadvantaged communities into vibrant, resilient, and prosperous areas.
- ✓ Historic Support: Significant funding dedicated to overcoming deep-rooted environmental issues and fostering sustainable solutions for immediate and long-term community benefits.
- Community Engagement: Grants are designed to foster community engagement











- **Welcome and Speakers**
- **Federal Requirements**
- **Project Evaluation**
- **Resources & References**
- Q & A Session Closing Remarks







Featured Presenters



Marianna Quenemoen Attorney Advisor EPA



Julie Milazzo Grant Program Analyst EPA

- Provides legal counsel on EPA's \$3 billion Inflation Reduction Act funded Environmental Justice Block Grant Programs.
- 8 years of experience running programs in community-based nonprofits.

- Specializes in grants policy and training development for EPA's Office of Grants and Debarment.
- 15 years of experience with EPA grant programs.



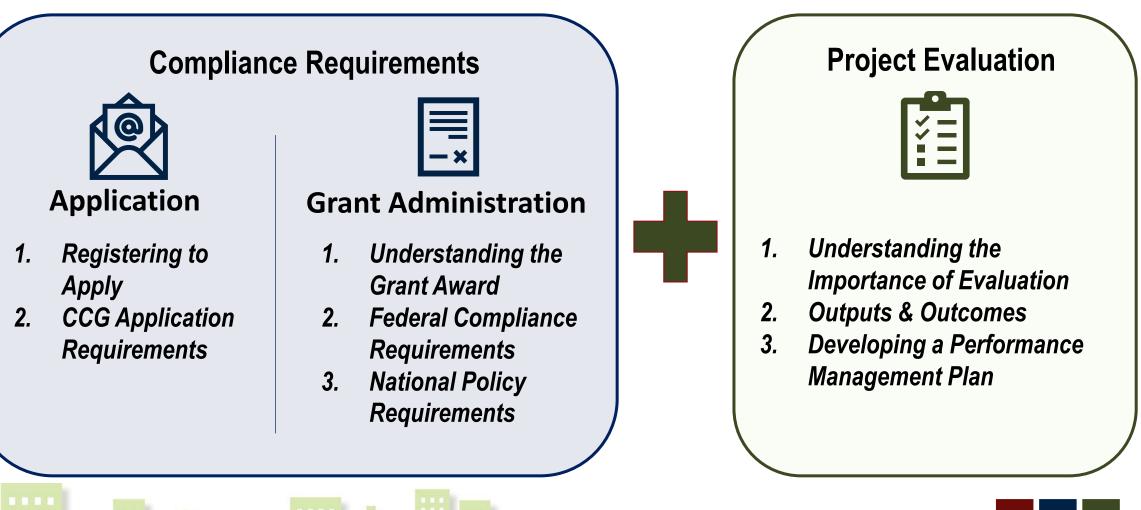
Sebastian Lemire Evaluation Senior Associate Abt Global

- Evaluation expert with over 20 years of experience designing and managing evaluations.
- Expertise in development and use of logic models for program design, implementation, and evaluation





Overview of Today's Presentation





Federal Grant Compliance



Compliance is a necessary component to be good stewards of taxpayer dollars.



Staying in compliance with a federal grant is just as important as securing one. Failure to comply may result in funds being forfeited or recouped.

Avoid violations with robust internal controls and careful documentation.



Registering to Apply





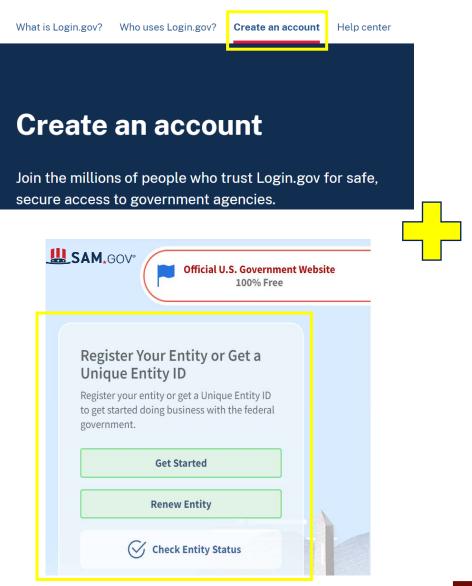
Register! Applicants will need to have an active SAM.gov account

- If you already have an account, register your organization
- If you do not have an account, you will need to create one through login.gov

AND

- Obtain a Unique Entity ID (UEI)
 - It is important to make sure that your registration includes a current e-Business (EBiz) point of contact NOFO Section IV.A

UOGIN.GOV



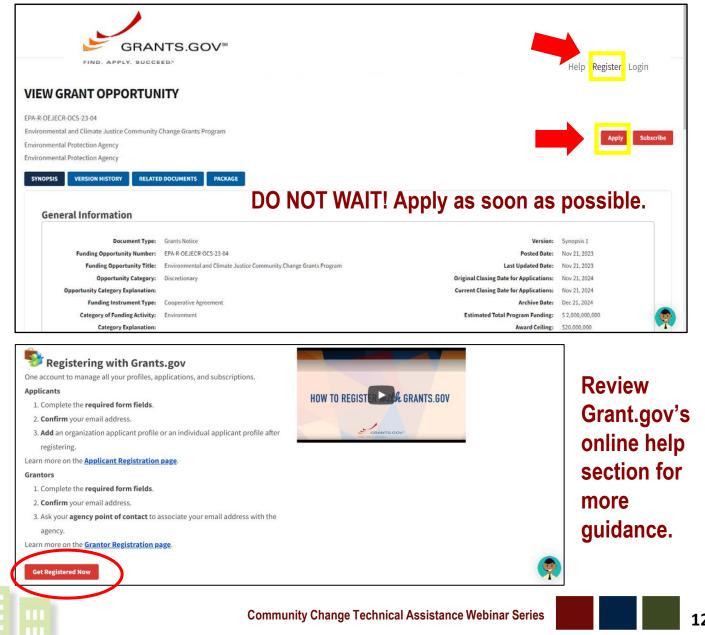




Grants.gov

- Applicants must register in Grants.gov
 - Make sure you have your EBiz point of contact and UEI
- EBiz point of contact is the only one who can assign roles to members of your organization
- One person must be assigned to be an Authorized Organization Representative (AOR)
 - **ONLY** the AOR can submit your application
- Applicants should register now, finalizing registrations could take more than a month.







Submission Requirements

- Applications that <u>do not meet all</u> the applicant threshold eligibility criteria <u>will be deemed</u> <u>ineligible for funding consideration</u> and WILL NOT be considered further. In some cases, EPA may ask for clarification before deeming an application ineligible.
- Applicants who are deemed ineligible for funding consideration because of the threshold eligibility review will be notified within 15 calendar days of ineligibility determination.

Reference NOFO Section III.B. for more information



Things to consider preparing your application

Register early on **Grant.gov** and **SAM.gov** as the process can take several weeks.

Applications for grant must be submitted **NO LATER** than November 21, 2024, at 11:59 PM EST, which also applies to resubmissions. Applications **MUST** be submitted through Grants.gov.

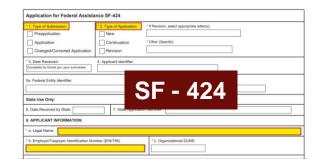
Early submission is advantageous because if unsuccessful, applicants have additional time to request a debrief and resubmit the application.

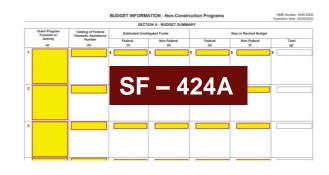


Required Forms & Documents

Track I & II Applicants:

- Application for Federal Assistance (SF-424)
- Budget information for Nonconstruction program (SF-424A)
- EPA Key Contacts form 5700-54
- EPA Preaward Compliance Review Report Form 4700-4
- Project Narrative Attachment Form





OMB Control No. 2030-002 Approval expires 06/50/202 Preaward Compliance Review Report for All Applicants and Recipients Requesting EPA Financial Assistance

> rol No. 2030-002 spires 06/30/202

Cants and Recipients Requesting EPA Financial Note: Read Instructions before completing form

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uthorized Representative: Original awards and amendments will be sent to this individual for review and acceptance, unless



Project Narrative File(s)



To add more Project Narrative File attachments, please use the attachment buttons below.

Add Optional Project Narrative File Delete Optional Project Narrative File View Optional Project Narrative File

Community Change Technical Assistance Webinar Series

NOFO Section IV.A





Required Forms & Documents (continued)

Track I & II Applicants:

- Attachment A: Program Budget Template
- Attachment B: Partnership Agreement
- Attachment C: Any other documents or information not listed above, such as an Indirect Cost Rate Agreement.

Track I Applicants Only:

- Attachment D: Project Area Map
- Attachment E: Community Engagement & Collaborative Governance Plan
- Attachment F: Community Strength Plan

NOFO Section IV.A

- Attachment G: Readiness Approach
- Attachment H: Compliance Plan

er At	tachment File(s)
	* Mandatory Other Attachment Filename:
	Add Mandatory Other Attachment Delete Mandatory Other Attachment View Mandatory Other Attachment
	To add more "Other Attachment" attachments, please use the attachment buttons below.
	Add Optional Other Attachment Delete Optional Other Attachment View Optional Other Attachment



CCG Compliance Plan



Compliance Plan – Track 1 Only



- Requirement 6 Attachment H Cannot exceed 5 pages
- Demonstrate systems, policies, and procedures in place to ensure compliance with grant terms and conditions
- NOFO Section I. G.

Financial management 2 CFR § 200.302(b)

Financial management software to track and report obligations, unobligated balances, assets, outlays, income, and interest, as well as budget/actual

Written policies and procedures for payments, records, personnel, procurement, and equipment

Internal controls 2 CFR § 200.303

Clear separation of duties for staff who 1) ensure accountability, 2) perform the accounting function, and 3) are responsible for signing the checks.

Retention of source documentation for entries in the financial management system

Pass-through / subawards CFR § 200.332

Ensure all **subaward agreements** are in writing and contain all of the elements required by 2 CFR 200.331(a)

System in place to **monitor and report** on the performance of subrecipients



Financial management - 2 CFR § 200.302(b)	
Internal controls - 2 CFR § 200.303	
Requirements for pass-through entities - 2 CFR § 200.332	10 Points (combined)
Manage broader legal and compliance risks – Demonstrate expertise, experience, or resources available to identify and manage legal and compliance risks	

See NOFO Section V.C. for complete guidance



Compliance Tips

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Things to consider



- Plan for adequate staffing staff up with people who understand how to manage federal funds
- Prevent fraud and abuse through clear division of responsibilities and accountabilities

- DOCUMENT, DOCUMENT, DOCUMENT
- If it's not written down, it didn't happen
- "Trust, but verify" we're going to need records

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- Read the EPA and grant-specific Terms and Conditions carefully
- Study the Grant Regulations at 2 CFR 200 and 1500

Grants Administration





CCG Awards are Cooperative Agreements



- EPA expects to award cooperative agreements under this notice, anticipating significant federal involvement and oversight by the EPA project officer in grant performance.
- NOFO Section II.H.

EPA's involvement may include:

- Closely monitoring grantee performance to verify outcomes
- Evaluating project phase outcomes before authorizing next project phase
- Reviewing terms of contracts, subawards, other financial transactions, and proposed procurement
- Approving qualifications of key personnel
- Providing feedback on reports prepared under the cooperative agreement
- Enforcing compliance with specific regulatory requirements, grant conditions, and federal laws
- Providing technical assistance





Grant Award



- The Notice of Grant Agreement is an official notification from EPA, which informs the applicant that its application has been selected.
- The Notice of Grant Agreement alone is not an authorization to begin work.
- NOFO Section VI. A.

Grant Award Notification

Selected applicants will receive a Notice of Grant Agreement, an official notification from EPA.

Incorporating your proposal into Grant Award

Once awarded, the proposal establishes a legally binding scope of work in grant agreement.

Applicants must ensure project activities are realistic to meet contractual obligations.

Terms and conditions

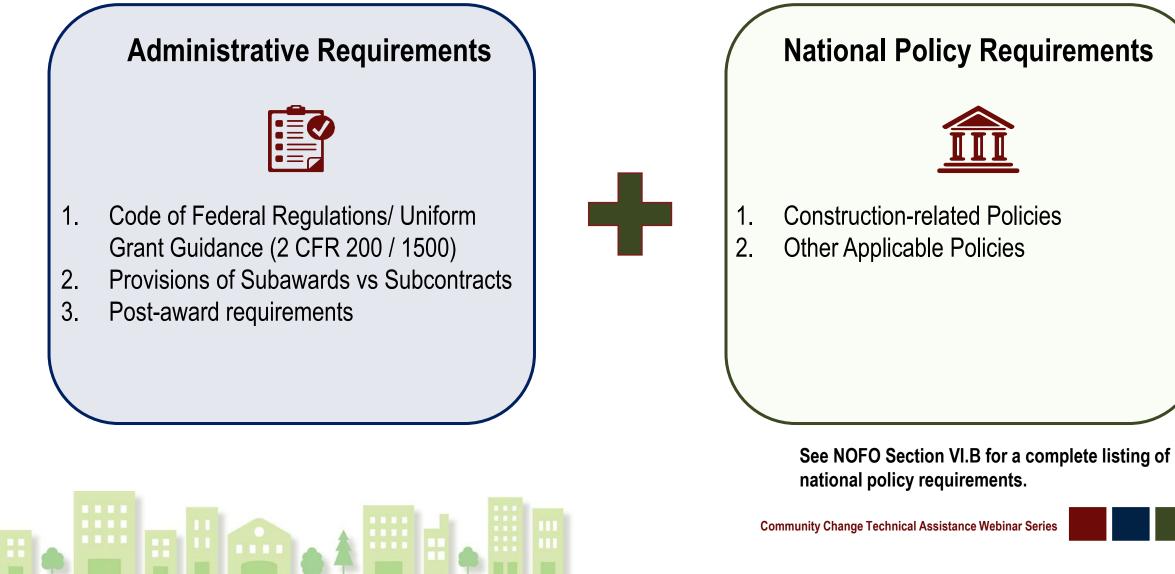
Awards will include binding terms and conditions to direct and support successful and timely grant performance.





Administrative and National Policy Considerations

23



Administrative requirements: Code of Federal Regulations/Uniform Guidance (2 CFR 200) (1 of 3)

Cost Principles and Audit Requirements 2 CFR Parts 200 and 1500

- What is it? These regulations provide standards for federal grants and cooperative agreements. 2 CFR 200 applies across all agencies, and 2 CFR 1500 applies only to EPA grants.
- Why it matters? These regulations ensure that federal funds are used appropriately, transparently, and effectively, minimizing the risk of fraud, waste, and abuse.
- *How it applies?* Recipients of federal funds must adhere to these regulations for determining the costs of grants and prepared for audits to ensure compliance.





Administrative requirements: Provisions of Subawards vs Subcontracts (2 of 4)

Subawards

- Awards provided to a subrecipient for carrying out a part of the federal award. If selected for an award, the Lead Applicant ensures that the subawardee complies with federal award conditions and the subrecipient's performance aligns with the objectives of the grant.
- <u>EPA Subaward Policy</u> implements the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards regulatory requirements.

Subcontracts

- Goods and services for the grantee's own use through a a procurement relationship.
- Subcontracts belong in the "contractual" budget category.
- If selected, subcontracts should comply with competitive procurement standards in accordance with 2 CFR Parts 200 and 1500, EVEN IF the application named certain contractors.

Reference NOFO Appendix G more information





Administrative requirements: Provisions of Subawards vs Subcontracts (continued)



 Lead Applicants must ensure that the terms and conditions of the grant agreement "flow down" to all subrecipients in the subawards.



 Recipients must create subaward agreements in writing that contain the elements in <u>2</u> <u>CFR 200.332</u>(a) and implement systems to monitor and guide subrecipient performance.

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- EPA approval is required before recipient issues a subaward if the subrecipient type is not detailed in the workplan.
- Any changes to approved subaward agreements must be approved by EPA





Administrative Requirements: Post-Award Requirements (3 of 3)

Other requirements may include:

- Post-Award Reporting requirements
 - Grantees will be subject to program performance, financial, and administrative reporting requirements,
- Audit Requirements
 - Grantees expending \$750,000 or more in total Federal funds in a fiscal year will be required to obtain a single audit from an independent auditor.
 - Grantee may charge the cost of the audit to the grant, provided such costs are reasonable.
- Record Retention
 - Grant documents pertinent to a Federal award must be retained for a period of 3 years after the grant ends.
- Quality Management Plan (QMP) and Quality Assurance Project Plan (QAPP)
 - For recipients that are collecting data, QMP and/or QAPP plans may be required and submitted for EPA's approval.
 NOFO Section VI.B.C and G





National Policy Requirements (1 of 2)

Projects with a <u>construction or infrastructure component</u> are subject to the following national policy requirements:



Build America Buy America Act

- What is it? Mandates that federal funds used for construction or repair of <u>infrastructure</u> in the U.S. prioritize the use of American-made goods, products, and materials.
- *Why it matters?* Supports domestic industries and ensures that federal investments contribute to American manufacturing and labor resilience.
- *How it applies?* Applicants must ensure that all construction products and materials are produced in the USA and comply with BABA guidelines throughout the procurement process



Davis-Bacon Related Act

- What is it? Requirement that ensures contractors receive no less than locally prevailing wages and fringe benefits compared to similar projects in the area.
- Why it matters? Ensures fair compensation for workers and prevents underbidding on federal contracts by reducing wages.
- **How it applies?** For construction exceeding \$2,000, recipients must ensure that their contractors and subcontractors comply with DBRA standards.



National Policy Requirements (2 of 2)



Other applicable policies include:

- Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA)
 - Grant agreement will include URA compliance requirements.
- Justice40 Reporting
 - Grant agreement will include a requirement to report on metrics demonstrating how grant activities advance the 40% goal.
- Environmental Justice Grant Applicant Database
 - Applicants who apply under this NOFO will be added to the database.
- National Historic Preservation Act (NHPA)
 - Grant agreement will include NHPA compliance requirements.
- Signage
 - Award will include appropriate terms and conditions about signage requirements.

NOFO Section VI.B



Project Evaluation

- 1. Understanding the Importance of Evaluation
- 2. Outputs & Outcomes
- 3. Developing a Performance Management Plan





Evaluation is the process of examining the performance of a project and identifying areas for improvement.

Evaluation is all about learning.



Why is Evaluation Important?



Things to Consider



Project designers can learn whether their project works as intended.



Project implementers can learn what they can do to make their project work better.



Stakeholders can learn whether they're investing in the right activities.



If projects don't work as intended, evaluation can help us learn how to make them better.



And if projects do work as intended, evaluation can help us to learn how to best to scale them up to new locations.



Evaluation creates a framework that makes it easy to assess the design, implementation, or results of a project.







EPA places a strong emphasis on evaluating the success of a project based on **tangible outputs** and **concrete outcomes**. The benefits delivered to the community as a result of the grant must be clearly measured and diligently tracked through the duration of the project.





Defining Outputs & Measuring Outcomes



Things to Consider

Outputs always have a number attached

What is the actual result of grant funds?

Measure progress through results

What measurable short and long-term results will the grant achieve?



Outcomes are focused on results

What is the impact of grant funds?



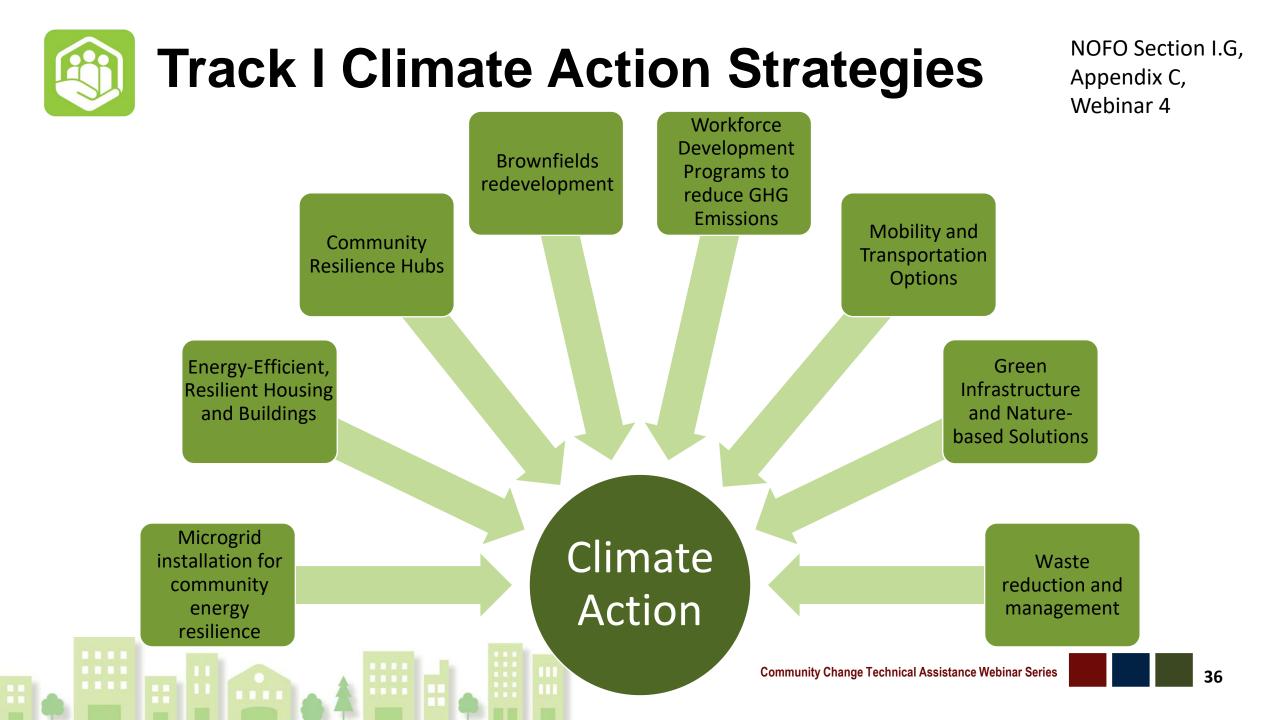




Appendix F contains example outputs and outcomes for:

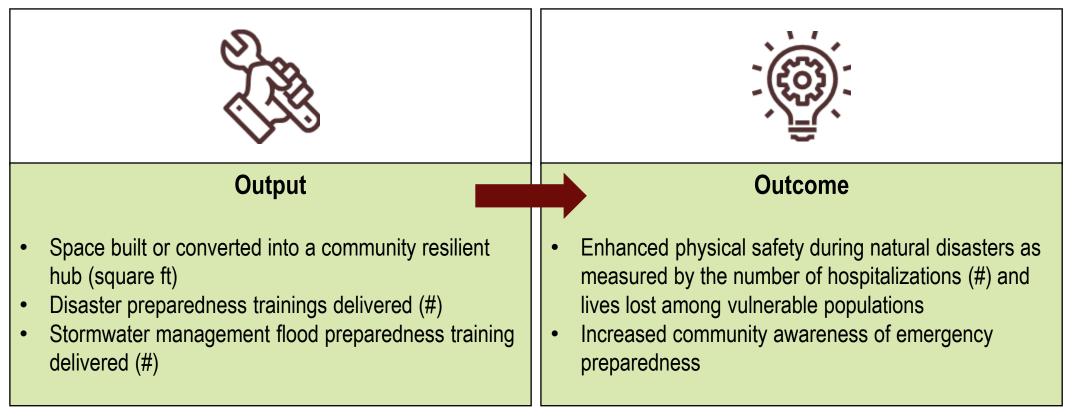
- Track I: Climate Action Strategies
- Track I: Pollution Reduction Strategies
- Track II: Meaningful Engagement for Equitable Governance Examples







Community Resilience Hubs







Inputs

- Community recommendations
- Planning expertise
- Emergency response
 expertise
- Trainings
- Meetings

Outputs

- Space built or converted into a community resilient hub (square ft)
- Disaster preparedness trainings delivered (#)
- Stormwater management flood preparedness training delivered (#)

Short Term Outcomes

Community Resilience Hubs

- Consensus documents
- Contracts
- Permitting
- Staffing plans

Mid term Outcomes

- Enhanced physical safety during natural disasters as measured by the number of hospitalizations (#) and lives lost among vulnerable populations
- Increased community awareness of emergency preparedness

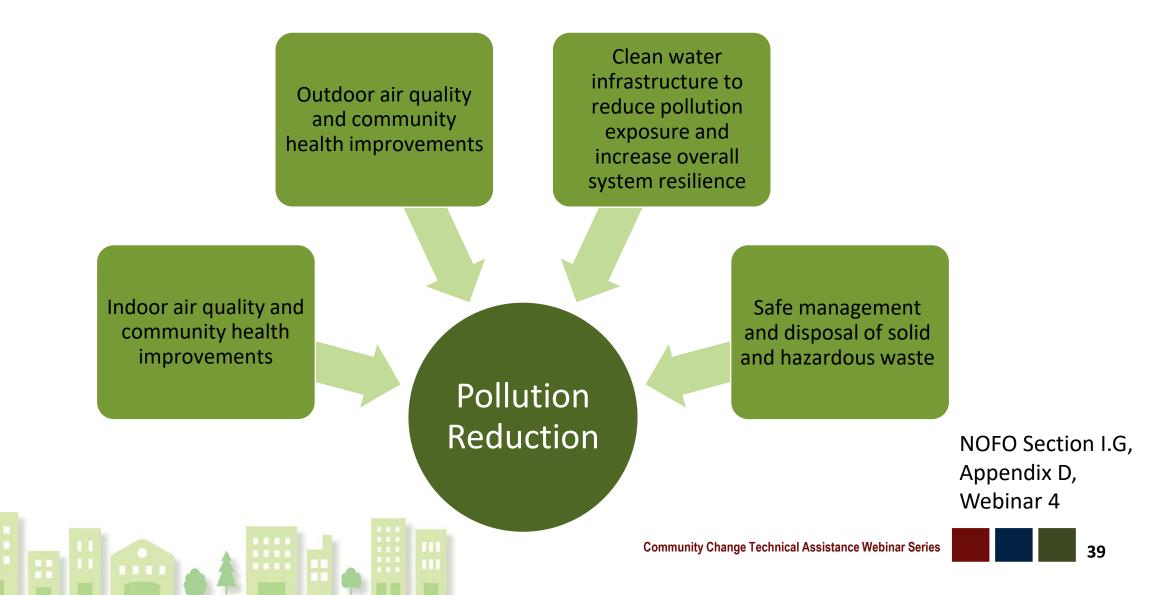
Long term Outcomes

•

Mitigated climate and health risks from urban heat islands, extreme heat, wood heater emissions, and wildfire events



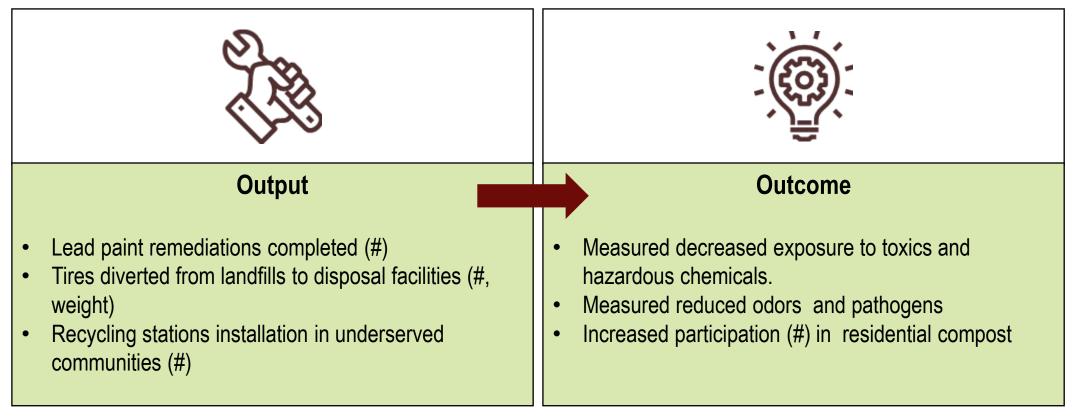
Track I Pollution Reduction Strategies





Track I Output / Outcome Example: Pollution Reduction Strategy

Safe Management and Disposal of Solid and Hazardous Waste







Track I Logic Model Example: Pollution Reduction Strategy

Safe Management and Disposal of Solid and Hazardous Waste

Inputs

- Community recommendations
- Waste Management Expertise
- Community Trainings
- Community Meetings

Outputs

- Lead paint remediations completed (#)
- Tires diverted from landfills to disposal facilities (#, weight)
- Residents served through residential waste composting (#)
- Recycling stations installed in underserved communities (#)

Short Term Outcomes

- Cleaner communities
 - Increased access to waste and recycling facilities

Mid term Outcomes

- Measured decreased exposure to toxics and hazardous chemicals
- Measured reduced odors and pathogens

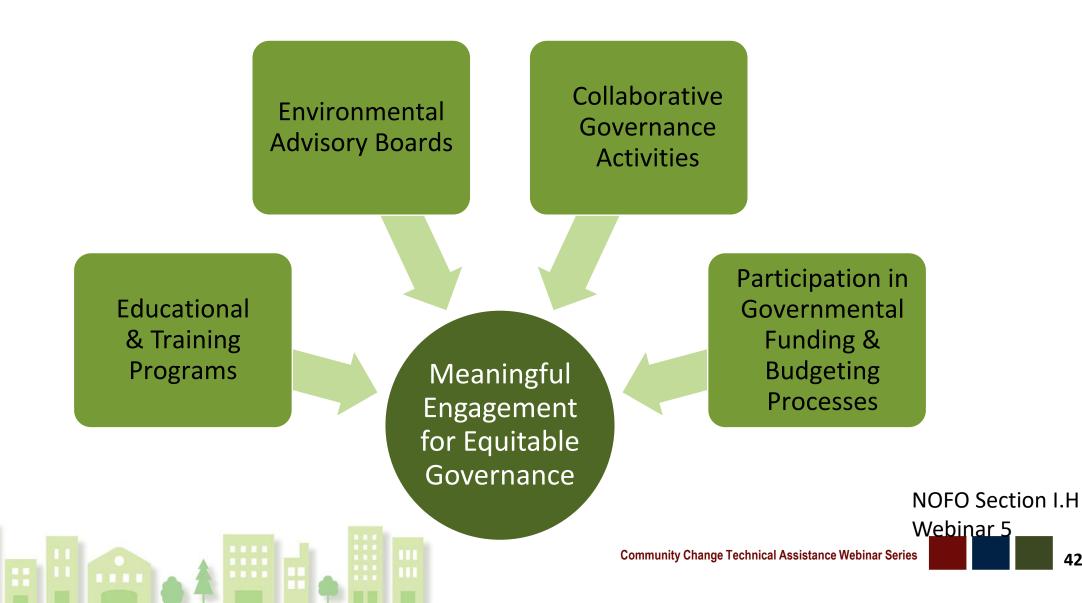
Increased participation (#) in residential waste composting

Long term Outcomes

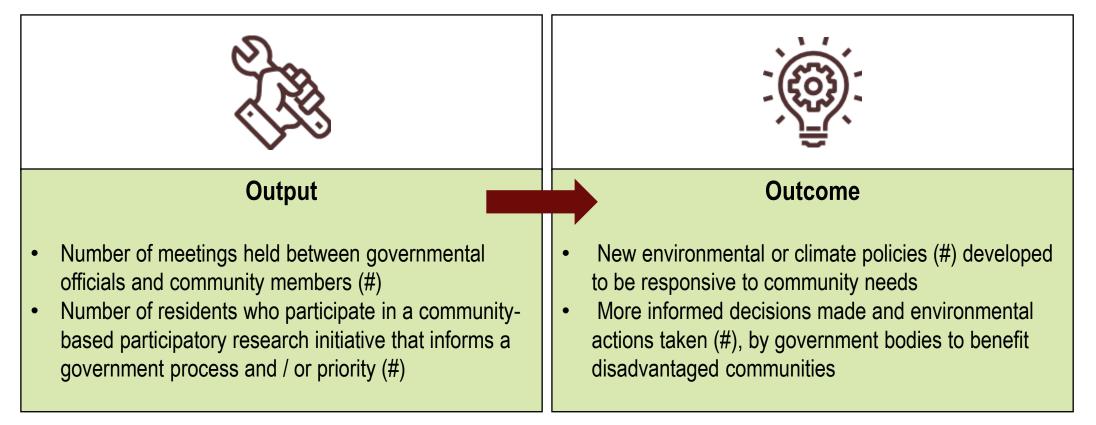
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- Enhanced physical safety and environmental safety around disposing of solid and hazardous wastes
- Increased community awareness of safe disposal methods









NOFO Appendix F

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Track II Logic Model Example:

Inputs

- Advertising
- Stakeholder Engagement
- Community Trainings
- **Community Meetings**

Outputs

- Number of meetings held between governmental officials and community members (#)
- Number of residents who • participate in a community-based participatory research initiative that informs a government process and / or priority (#)

Short Term Outcomes

Environmental Advisory Board

- Increased community engagement
- Increased community . awareness and involvement on environmental issues

Mid term Outcomes

- New environmental or • climate policies (#) developed to be responsive to community needs
- More informed • decisions (#) made, and environmental actions taken (#), by government bodies to benefit disadvantaged communities

Long term Outcomes

•

Stronger relationships and trust between disadvantaged communities and government entities on matters relating to environmental protection policies







Describe how to plan, track, and measure project performance, towards achieving the expected outputs and outcomes

This helps describe the "what" that is being achieved

NOFO Section I.I, Section IV.B





- Use data to create specific outputs and outcomes
- Create a plan
- Staff your plan you can use budget to hire evaluation experts (NOFO Section I.I)
- Implement your plan over time
- Use your data to answer questions, discuss interesting findings, make midcourse corrections and report results









Track I: Performance Management Plan and Outputs/Outcomes Scoring

See NOFO Section V.C. for complete guidance	Total	6 Points
 Describe how the results of the evaluations will meet project goals within the timeframes. 	e required	
 Document and measure progress towards goals 		
Plan for program evaluation activities from project kickoff to completion		
 Outputs and Outcomes should be specific Lead to improvements to the environmental conditions and public health of disadvantaged communities. 	f the	2 Points
 Projects need an effective Performance Measurement Plan Include timeframes, tracking and measuring progress towards outputs outcomes 	and	2 Points

Resources & References





Applicants can use following lists for additional guidance and suggestions

Grants.gov	Grants.gov (visit for registration and application submission)	
Login.gov	Creating SAM.gov Account	
SAM.gov	SAM.gov (visit for registering your entity and obtaining a UEI)	
FAQ's on SAM.gov Registration	Registering Entity vs. Getting an UEI	
Federal Service Desk	Contact for Help with SAM.gov Account	
Intro to Grants.gov	Understanding User Roles Video & Learning Workspace Video	
Useful Tips	Tips for Completing EPA Form 4700 - 4	
EPA's Terms & Conditions	General Terms and Conditions	
FAC.gov	Federal Audit Clearinghouse	
2 CFR 200	Code of Federal Regulations	
EPA Subaward Policy (GPI 16-01)	EPA Subaward Policy for EPA Assistance Agreement Recipients	
EPA's Build and Buy America	https://epa.gov/cwsrf/build-america-buy-america-baba	



Q & A

- Use Q & A chat feature
- Selection of FAQs



Questions Submitted During Registration

- What grants management personnel should we have to effectively comply with the CC grant management?
- Are there any good grant software programs you would recommend to gauge grant compliance?



Closing Remarks

- Key Messages
- Next Steps



Key Messages

- Review and strictly follow EPA's guidelines for project success and regulatory compliance
- Remember to ensure compliance with EPA standards throughout all project phases from procurement and implementation to reporting and evaluation.
- Plan Early!
- Utilize program evaluation to guide effective implementation and promote continuous improvement.

Technical Assistance Update: Status and Expert Matching

TA Current Status

• Total TA Requests Received: 467

Progress in Technical Assistance Phases

- Phase 1 Needs Assessments Completed: 240
- Lead TA Provider (LTPs) Assigned (Communities Matched): 229
- Phase 2 TA Initiated: 16

TA

Request

www.communitychangeta.org



r (LTPs) Assigned latched): 229 ted: 16	•	Community Change Grants Tec Form OMB Control No: 2030-0051 Expiration Date: 05/31/2024 This form is to express interest in receiving technic Climate Justice Program's <u>Community Change Gran</u> To request TA for preparing a Community Change I 1 (800) 540-8123 if you have any questions or need	al assistance (TA) for the EPA Environmental and <u>its (Community Change Grants)</u> . Grant application, please fill out this form or call
tychangeta.org		Receiving TA does not guarantee that you will receiprogram. If you have any questions or concerns ab EI_TechAssist@epa.gov.	
Fligibility	Lead Technical	Needs	<u>Specific</u>
Eligibility	Assistance	Assessment &	<u>Technical</u>
Review	Provider (LTP)	Work Plan	<u>Support</u>



Community Change Technical Assistance (CCTA) Webinar Series Schedule

All sessions at 3pm ET, Tuesdays

30 JAN Kickoff & Program Overview TA Process, CCG Overview

6 FEB

Eligibility & Partnerships Applicant Criteria, Partnership Dynamics

13 FEB

Defining Disadvantaged Communities Community Mapping, EJ Indicators

20 FEB

CCG NOFO Track I Overview Project Strategies, Community Needs

27 FEB

CCG NOFO Track II Overview Policy, Capacity Building

5 MAR

Community Engagement & Governance Engagement Models, Governance Strategies

12 MAR

Federal Grants Requirements & Compliance Compliance Requirements

19 MAR

Preparing a Grant Budget Budgeting Techniques



Thank You.



<u>CommunityChangeTA.org</u> is LIVE NOW

- □ Visit <u>CommunityChangeTA.org/webinars</u> to view a recording of today's webinar, as well as
 - register for upcoming webinars.
- □ Today's recording will be posted within 24 hours of today's presentation.
- EPA FAQs Community Change Grants NOFO
- □ Visit the EPA's CCG Website <u>https://www.epa.gov/inflation-reduction-act/inflation-reduction-</u>

<u>act-community-change-grants-program</u>

Still have Technical Assistance questions?

□ Send your Community Change Technical Assistance questions to <u>EJ_TechAssist@epa.gov</u> or

call <u>1-(800) 540-8123</u>

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