

US EPA ARCHIVE DOCUMENT

**POLICY
FOR USING GRTS
FOR
SUBMITTING WORKPLANS
AND
FOR SEMI-ANNUAL PROGRESS
REPORTING
SECTION 319(h) GRANTS**

**EPA Region III
February 2002**

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A. Introduction

The Environmental Protection Agency's Headquarters (EPA HQ) Office of Water issued a memoranda on September 27, 2001, the subject of which is **Modifications to Nonpoint Source Reporting Requirements for Section 319 Grants (FY2002 National GRTS Requirements)**.

EPA Region III used the occasion to revise its policy for management of the Section 319(h) Nonpoint Source grants through the Grants Reporting and Tracking System called GRTS.

This policy document

- to provide information to Region III States using the web-based Grants Reporting and Tracking System (GRTS) to electronically submit draft workplans and requirements to report their semi-annual progress on Section 319(h) nonpoint source (NPS) grants
- articulates EPA Region III's commitment to encourage and promote full migration of State 319 grant activities to the electronic media through wider use of the pre-award capabilities of GRTS and more timely entry of critical data into GRTS.

B. Using the GRTS Pre-award Module

EPA Region III is actively encouraging the submittal of draft workplans using the GRTS Pre-award module. This module, which is accessible directly from the GRTS Main Navigator, contains all the GRTS data input screens except that the data can only be viewed by the initiator. The State and EPA Region III office can work together to set up access rights to permit additional State and Regional staff to access the data.

C. Grantee Performance Reports

EPA Region III is increasing emphasis on the regulatory requirement concerning Performance Reports. 40 CFR section 31.40(b)(1) requires States to submit performance reports on the status of section 319(h) grants. States are to submit their reports on a semi-annual basis on January 31 and July 31 in conjunction with complying with GRTS Project and Task Reporting requirements.

The regulation indicates that Performance Reports should include at a minimum (See Appendix C for the regulatory requirement):

- o Performance/Milestone Summary
- o Slippage Reports
- o Additional pertinent information.

EPA Region III is proposing GRTS data input screen changes to EPA HQ to permit State compliance through GRTS (see below). Some of the advantages of using GRTS for Performance Reporting are that States

1. Are being empowered to evaluate their own progress under their grants
2. Will be able to document their grant files with evidence of compliance with regulation, guidance and R3's special grant conditions.
3. Can reasonably expect that EPA will review and comment on their State GRTS reports in writing within 30 days of posting in GRTS.
4. Can provide professional opinion of their own progress, as well that of subgrantees, to their management and to provide subgrantees with feedback.

Region III will implement this requirement for the reporting period ending July 31, 2002 and it will be continued for each reporting period thereafter. Thirty days prior to the semi-annual GRTS reporting period, the State NPS Program Manager will advise EPA Region III in writing that the State would provide its GRTS Report on the due date. The written notice to EPA can be done by e-mail. The notice should be sent to the EPA Region III NPS Team Leader, Fred Suffian (suffian.fred@epa.gov), with copies to the GRTS Coordinator Gene Mattis (mattis.gene@epa.gov) and the respective EPA program manager.

Compliance with the Performance Report requirement would be achieved in a manner similar to the one described in Appendix C.

D. Reporting on National Mandated Program Elements

The Office of Water **Nonpoint Source Program and Grants Guidance for Fiscal Year 1997 and Future Years** instructed Regions to include a grant condition requiring States to enter data into GRTS for the Nationally Mandated Program Elements. These elements enable Headquarters to provide a defense of and support for the NPS program before the Congress. Region III will merge its current two grant conditions into one condition which refers to both the new Region III and national requirements.

In Region III, our intention is to use GRTS to assist in the Project/Grant approval process. Specifically, we will encourage States to enter basic workplan data using the pre-award module. Basic information should be supplemented by attaching an electronic version of a draft workplan to the Project in GRTS.

In general, EPA Region III will require that data be put into GRTS within two months of the award. However, we will work with States to enter many of the critical data inputs into the pre-award database as part of the pre-award review and dialogue process. Whereas we will encourage States to attach Project Reports to the GRTS Project Evaluation for completed projects, we would also encourage them to attach their complete draft Project Scopes of Work to the pre-award Project proposal.

E. Reporting at the Project Level

1. Description Field Required

There is a new nationally mandated Project Description field which is to include a brief description of the problem being addressed, project goals, and other anticipated deliverables/benefits (if applicable).

Region III requires that this field be filled in no later than two months after grant award. If there are changes in project goals, anticipated deliverables/benefits, etc., the State may change the initial entry in the Project Description field in conjunction with the preparation of the semi-annual report of progress.

For incremental funds, States must specifically identify and describe how these funds are being used in relation to Watershed Restoration Action Strategies (WRAS) and/or TMDL requirements.

If the State prefers to report changes in goals, deliverables, etc. in project reports in the Project Evaluation field rather than changing the initial Project Description, they may do so.

EPA HQ is preparing a standard template for the Project Description field that includes all of the elements listed above. EPA Region III will work with EPA HQ to have any State data entered before the template is available transferred to the template format.

2. Geolocating Section 319 Projects

The new nationally mandated geolocational field will replace the current field where States enter 8-digit "hydrologic unit code" (HUC) information. Because 8-digit HUC watersheds can be over 1 million acres in size, more specific geolocational information for Section 319 projects is needed for the public to get a better indication of the activities and results within a local watershed. In addition, demarcating Section 319 projects on the GIS display of the Water Assessment and Tracking Environmental Results System (WATERS) will enable EPA to relate projects to waters listed under Section 303(d) and eventually to waters assessed under Section 305(b). Therefore, geolocational information will now be reported at the stream reach level (which also

includes information on lakes and many other water bodies). Specifically, reach codes of the affected stream segments must be entered into the geolocational field of GRTS.

3. Final Project Reports

EPA Region III encourages States to place all their project reports into GRTS by attaching project reports in the Project Evaluation field.

--This will facilitate the availability of information to EPA and other States who may benefit from reviewing information about projects across the country.

– Reporting in this field can be done in lieu of doing project reports on paper.

– State contractors, substate units of government, conservation groups, etc. can be authorized to enter data directly into GRTS to cut down on State resource demands.

For FY2000 grants and beyond, Region III will rely more heavily on reporting at the Project Level and less at the Task Level provided EPA and the State negotiate an agreement on quantifiable outputs and/or environmental benefits for Projects, as appropriate.

4. Project Status Field Required

EPA Region III's shift to a Project focus makes the Project Status field very important. States should indicate one of the following seven options: *Behind Schedule, On schedule, Ahead of Schedule, Revised, Completed, Discontinued, Not Initiated*.

4. Project Evaluation Field Required

Paragraph(s) update on the status of each Project. Pertinent information should be added semi-annually. This must include information on any reported problems in the Project Status Field (e.g. behind schedule, on schedule but problems or potential problems) and can also include other additional information the State feels would be useful to EPA and/or other GRTS users, such as when EPA can expect to review a draft deliverable, positive public feedback on a project, if new partners have joined the effort, or other valuable information. This information can also be entered more frequently on an as-needed basis if desired.

F. Reporting at the Task Level

EPA Region III's continues to shift its focus toward tracking accomplishments at the Project level insofar as EPA and the State negotiate specific environmental benefits targeted for each implementation Project.

States should continue to include significant tasks in 319 workplans which are submitted to EPA for funding. However, the primary purpose for articulating tasks in the workplan is to facilitate review by EPA technical reviewers, that is, to assist them in forming professional judgments concerning the manner in which the projects are to

be conducted.

Since GRTS is also designed to assist States to track grant activity and expenditures for their purposes, States may continue to use the Task fields for their own management needs and purposes.

Task and task evaluations will continue to be reported for projects which do not have specific environmental benefits.

G. Commentary on Specific Reporting Changes and Points of Focus

Each subsection below discusses a particular change to GRTS, which will be applicable beginning with the fiscal year 2002 grant cycle and for which Region III's requirements differ from those of EPA HQ. Any project using FY 2002 funds should enter the new mandated reporting elements into GRTS.

1. Load Reductions

For FY2002 and beyond, the GRTS nationally mandated elements will include a Load Reduction field.

a. General Load Reduction Requirements

EPA HQ will now require that load reduction information for Section 319 implementation projects be entered into GRTS. The load reduction field within GRTS will be mandated for projects that address nitrogen (lbs/year), phosphorus (lbs/year), and sediment (tons/year).

EPA Region III will continue to require that estimates of load reduction or change in concentration information be provided for projects addressing any pollutants, including nutrients or sediment. EPA Region III requires that estimates be included in draft workplan proposals so that projects can be evaluated on estimated environmental impact.

States will make any necessary changes in load reduction calculations based on further implementation when they prepare their semi-annual reports of progress. This will facilitate States' compliance with the requirement in Section 319(h)(11) to annually report load reductions.

Some Section 319 projects are intended to prevent pollution, rather than reduce existing pollution (for example, land easement or acquisition projects that prevent or modify development). If a State has a dependable way of quantitatively measuring pollution prevention of nutrients or sediment, this estimate may be entered into the load reduction field.

b. Wetlands/Streambanks/Shorelines

In addition to calculating load reductions for sediment and nutrients, EPA believes it is also critical to account for the successful implementation of several key practices that not only reduce loads, but protect the biological and physical characteristics of waterbodies. There will be a mandated field that will track the following measures when relevant to the project:

- Wetlands restored (acres)
- Wetlands created (acres)
- Streambank and Shoreline Protection (feet)
- Stream Channel Stabilization (feet)

While EPA HQ will not require that forecasts be entered into GRTS at the time the grant is awarded, EPA Region III requires that estimates be included in draft workplan proposals so that projects can be evaluated on estimated environmental impact.

2. Expenditure breakdown for main source categories in Primary Category of Pollution field

In order to discern approximately what percentage of project dollars is going for what source of pollution, States must enter what percentage of dollars goes for what aspect of the project in the Primary Category of Pollution field.

Region III requires that States provide estimated percentages at the time that draft workplans are submitted so that the proposed projects can be evaluated within that context. Final project costs percentages are to be reported in GRTS no later than ninety days after project completion or in the next semi-annual GRTS report, whichever comes later.

Dollar percentage breakdowns will not be required for subcategories in the Secondary Category of Pollution field.

3. Best Management Practices

A field for Best Management Practices is now a mandated field. The field will only require the name of the BMP(s), not where it is located. EPA will provide a more comprehensive list than the current BMP picklist for states to choose from.

EPA Region III requires that States provide an estimate of BMP units (e.g. number of feet of terraces) associated with the implementation of a BMP.

H. Frequency and Timing for Reporting

Progress Reports are required semi-annually and are due no later than January 31 and July 31. Thirty days prior to the semi-annual GRTS reporting period, the State NPS Program Manager will advise EPA Region III in writing that the State will provide its GRTS Report on the due date. The written notice to EPA can be done by e-mail. The notice should be sent to the EPA Region III NPS Team Leader, Fred Suffian (suffian.fred@epa.gov), with copies to the GRTS Coordinator Gene Mattis (mattis.eugene@epa.gov).

States should confer with their EPA Grants Project Officer if they are unable to comply with reporting requirements within these time frames.

I. Reporting Matrix

Appendix A lists and contrasts GRTS Reporting Requirements for EPA HQ and for EPA Region III.

Appendix A: Matrix of GRTS Reporting Requirements effective FY2002 and Beyond
EPA Region III

1. Nationally Mandated Elements	HQ Reporting Requirement	Region III Requirement
A. Data Entry Requirements	Data is to be entered in a ‘timely fashion.’	Data is to be entered within 60 days of grant award.
<u>Project Title</u>	Existing GRTS requirement	Same data requirement as HQ
<u>Project Start Date</u>	Existing GRTS requirement	Same data requirement as HQ
<u>Project Completion Date</u>	Existing GRTS requirement	Same data requirement as HQ
<u>Stream Reach Code</u>	Geolocational information is required for all projects except those that apply statewide or involve activities that otherwise do not lend themselves to precise geolocation (Primary Functional Category of Pollution fields 100, 201, 202, 410, and 600)	Same data requirement as HQ
<u>TMDLs check-off</u>	This field will be a simple check-off box addressing the type of link (if any) the project has to TMDLs.	Same data requirement as HQ
<u>Reformatted Primary Category of Pollution field</u>	The Primary Category of Pollution field is being redesigned so that so that up to five main source categories may be entered. A dropdown box will be used for the Primary field to restrict what options can be entered	Same data requirement as HQ

<p><u>Secondary Category of Pollution</u></p>	<p>The Secondary Category of Pollution field will now be mandated. This field will be restricted to sub-source categories, such as “forest harvesting”</p> <p>A dropdown box will be used for the Secondary field to restrict what options can be entered</p>	<p>Same data requirement as HQ</p>
<p><u>Best Management Practices</u></p>	<p>This field will only require the name of the BMP(s), not where it is located.</p> <p>GRTS Form will also provide an option to record BMP units (e.g. number of feet of terraces); however, unit information will not be mandated.</p>	<p>Same data requirement as HQ</p>
<p><u>Pollutant Type</u></p>	<p>States must identify specific pollutants in most cases. However, an “All Pollutants” option will be available and States will still have the option of entering “Cause Unknown,” if the pollutant the project is addressing is unknown.</p>	<p>Same data requirement as HQ</p>
<p><u>Waterbody Type, 303d List</u></p>	<p>Existing GRTS requirement</p>	<p>Same data requirement as HQ</p>
<p><u>Clean Lakes Information</u></p>	<p>Existing GRTS requirement</p>	<p>Same data requirement as HQ</p>
<p><u>319(h) Base Funds</u></p>	<p>Existing GRTS requirement</p>	<p>Same data requirement as HQ</p>
<p><u>319(h) Incremental Funds</u></p>	<p>Existing GRTS requirement</p>	<p>Same data requirement as HQ</p>
<p></p>	<p></p>	<p></p>

<p><u>Project Description</u></p>	<p>This mandated field is to include: a brief description of the problem being addressed, project goals, and other anticipated deliverables/benefits (if applicable).</p> <p>EPA is developing a standard template that includes elements listed above.</p>	<p>Same data requirement as HQ</p>
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<p>1. Nationally Mandated Elements (continued)</p>	<p>HQ Reporting Requirement</p>	<p>Region III Requirement</p>
<p>B. Data Entry Requirements</p>	<p>As shown below</p>	<p>Within 60 days of grant award</p>
<p><u>Load Reductions (Nutrients and/or Sediment)</u></p>	<p>EPA HQ requires that load reduction information for implementation projects that address nitrogen (lbs/year), phosphorus (lbs/year), and sediment (tons/year) be loaded into GRTS.</p>	<p>EPA Region III requires that load reduction information for implementation projects</p> <ol style="list-style-type: none"> 1. that address nitrogen (lbs/year), phosphorus (lbs/year), and sediment (tons/year) 2. For projects addressing pollutants other than nutrients or sediment, EPA Region III requires forecasts of load reductions or changes in concentration information

	<p>Load reduction data is to be loaded into GRTS after the first year of project implementation.</p> <p>–Any necessary changes in load reduction calculations based on further implementation should be made at least annually thereafter.</p>	<p>States are to provide estimated reduction numbers into GRTS within 60 days after grant award and make any necessary changes in load reduction calculations based on further implementation at least annually thereafter</p>
<p><u>BMP Implementation Project for nutrients and sediment</u></p>	<p>There will be a mandatory check-off box for whether or not the project is a BMP implementation project that addresses nutrients and/or sediment. If it is not a BMP implementation project that addresses nutrients and/or sediment, then the system will automatically enter ‘Not Applicable’ into the load reduction field.”</p>	<p>Same data requirement as HQ</p>
<p><u>BMP Implementation Project for pollutants other than nutrients and sediment</u></p>	<p>If it is not a BMP implementation project that addresses nutrients and/or sediment, then the system will automatically enter ‘Not Applicable’ into the load reduction field for EPA HQ purposes only</p>	<p>For projects addressing pollutants other than nutrients or sediment, EPA Region III requires forecasts of load reductions or changes in concentration information.</p> <p>States will use the Load Reduction Field which appears in GRTS under the data field for nutrients and sediment</p>

<p><u>Modeling or Monitoring check-off</u></p>	<p>Below the load reduction field, there will be a mandated field for the State to indicate whether it used monitoring or modeling for estimating its load reduction figure. If modeling is used, the name of the model used should be entered, as well.</p>	<p>Same data requirement as HQ</p>
<p><u>Name of Model</u></p>	<p>States will enter the name of the model they use to do their load reduction estimates, or enter “Not Applicable.”</p>	<p>Same data requirement as HQ</p>
<p><u>Wetlands/Streambanks/Shorelines</u></p>	<p>This field will track wetlands created and restored, streambanks stabilized, and shoreline protected if applicable to the project.</p>	<p>Same data requirement as HQ</p>
<p><u>Expenditure breakdown for main source categories in Primary Category of Pollution field</u></p>	<p>States must estimate amount of money for each main source category after the project is closed out.</p>	<p>Region III states must estimate the amount of money for each main source category in the work plan. Estimates may be changed, as necessary, in the semi-annual reports. Estimates are to be finalized after the project is completed and reported in the next semi-annual report..</p>

2. Regionally Mandated Requirements	Description of Requirement	Region III Compliance Reporting Frequency
<u>40 CFR 31.40(b)(1) Performance Reports</u>	Performance Reporting is to be accomplished in the manner described in the Region III GRTS Reporting Policy _____	Performance Reports must be completed semi-annually in GRTS on Jan 31 and July 31
<u>Project Status</u>	Status is to be reported using one of the seven standardized options on the GRTS Pic-It List	Project Status must be reported on semi-annually in GRTS on Jan 31 and July 31
<u>Project Evaluations</u>	Paragraph update with pertinent information. Region III has particular interest in Projects reported as Completed, Behind Schedule, Discontinued	Evaluations should be updated, as necessary, each reporting period.
<u>Task Status</u>	Status is to be reported using one of the seven standardized options on the GRTS Drop-down list.	Task Status must be reported on semi-annually in GRTS on Jan 31 and July 31 Tasks are to be reported on for those projects which do not have specific environmental benefits.
<u>Task Evaluations</u>	Paragraph update with pertinent information. Region III has particular interest in Tasks reported as Completed, Behind Schedule, Discontinued	Evaluations should be updated, as necessary, each reporting period. Tasks evaluations are to be reported on for those projects which do not have specific environmental benefits.

Appendix B: Purpose and Background

A. Purpose

The purpose of this policy is

–to provide information to Region III States using the web-based Grants Reporting and Tracking System (GRTS) to electronically submit draft workplans and to report their semi-annual progress on Section 319(h) nonpoint source (NPS) grants and

--to update Region III's Reporting Policy dated January 2000 in light of

- o Regional program experience
- o The publication of EPA HQ memoranda
 - **Modifications to Nonpoint Source Reporting Requirements for Section 319 Grants (FY2002 National GRTS Requirements)**
 - **Supplemental Guidelines for the Award of Section 319 Nonpoint Source Grants to States and Territories in FY 2002 and Subsequent Years.**
- o EPA Region III 's commitment to encourage and promote full migration of State 319 grant activities to the electronic media through wider use of the pre-award capabilities of GRTS and more timely entry of critical data into GRTS.

B. Brief Background

The Director of the Region III Water Protection Division articulated in December 1999 that

1. He would like to have staff negotiate streamlined State NPS work program and grant reporting requirements for FY2000 grants and beyond.

2. Task Level progress reporting would be dispensed with for projects for which EPA and States negotiate goals at the Project Level to achieve specific outcomes and report measurable environmental results (MERS).

With the implementation of the **FY2002 National GRTS Requirements** for FY2002 and later grants, all implementation projects are expected to report load reductions for nutrient and sediment pollutants and other metrics, such as acres of wetlands restored and feet of stream fencing installed. EPA Region III's reporting focus for implementation projects will move to the Project level rather than Task. However, States may continue to enter Task data into GRTS for their own informational and management purposes. Task reporting continues to be required for Projects that do not have MERS.

It is our expectation that the new reporting elements will expedite States' ability to achieve the requirements of Section 319(h)(11) that States annually report available information on load reductions and actual water quality improvements for at least the portion of a State nonpoint source management program's load reductions attributable specifically to Section 319 projects.

EPA Region III is amenable to work with States to revise workplans with a focus on MERS for grants already awarded for future reports, should States wish to do so.

Appendix C: Proposed Changes to GRTS to Facilitate Performance Reporting

The regulation 40 CFR section 31.40(b)(1) requires that Performance Reports include at a minimum:

- o Performance/Milestone Summary: A listing of major program and project accomplishments for the period (based on the project and program milestones or commitments contained within approved workplans, grant agreements, or special conditions/agreements), as well as progress made toward meeting future milestones.
- o Slippage Reports: Provide reasons for delays in meeting scheduled milestones/commitments and discuss what actions . . . will be taken to resolve any current or anticipated problems.
- o Additional pertinent information including, when appropriate, analysis and explanation of cost overruns, unanticipated events/consequences, etc.

EPA Region III has submitted a request to EPA HQ to change the GRTS Grants Screen to facilitate compliance with Performance Report requirements. Compliance would be achieved in a manner similar to the following:

1. The State would provide the following information on the grant level GRTS screen .
"Please check the box to the right if grant progress has been satisfactory during the reporting period ending _____(Drop-down calendar)."
2. "The following projects (picked from a Drop-down numeric list) have been completed during the reporting period ending _____ (date automatically carried over from first Drop-down item))."
3. "The following projects (a numeric Drop-down numeric list) fell behind schedule during the reporting period ending _____ (date automatically carried over from first Pick-It item)."
4. "Check box on the right if your agency is providing additional information or clarification as Attachments below regarding #2 or #3 ."