

US EPA ARCHIVE DOCUMENT



Brownfields Grants Cost Share

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Statutory Requirement

- **Cost Share of 20% Required For:**
 - Brownfields Cleanup Revolving Loan Fund
 - Brownfields Cleanup

**Cost Share is
Portion of Project
Not Funded from the Grant**





Guidance and Resources

- **Regulations - 40 CFR 30.23**
- **National Proposal Guidelines - Appendix 2**
- **OMB Cost Principles - A-122 Non-profits**
- **Terms and Conditions**





The Basics

- **Verifiable**
- **Necessary & Reasonable**
 - For Project Objectives
- **Allowable**
- **Non-Federal**, unless authorized by source
- **Not Counted** as other **Grant's Cost Share**
- **Identified in Budget**
- **Allocable**



Cost Share Resources

- **Cash**
- **Non-Federal Grants**
- **Labor**
- **Materials**
- **Supplies**
- **Services**





Recipient Labor

- **Timing**
 - After Award, unless approved
- **Records**
 - Time and Effort Reports





Volunteer Labor

- **Records**
 - Same as Recipient Personnel Records, to the extent feasible
- **Value Estimate (Hourly Rate)**
 - Non-Profit Has Similar Employee
 - Rate Non-Profit Pays Its Own Workers
 - Non-Profit Does Not Have Similar Employee
 - Pay for Similar Work, Same Labor Market
 - Can Include Fringe Benefits
 - Fair and Reasonable
 - Show How Derived
- **Safety & Health Concerns**



Third Party & Other Organization Employee Labor

- **Must be Verifiable By Records**
- **Value Estimate (Hourly Rate)**
 - Employee's Regular Rate
 - Can Include Fringe Benefits
 - No Overhead
- **Examples, Partner Assistance**
 - Site Manager
 - QA Officer
 - Other Programmatic Activities



Donated Supplies & Equipment

- **Supplies**
 - Market Value at Donation time
 - Examples (Clean Fill, Containment Plastic)
- **Equipment Loaned**
 - Fair Rental Rate
 - Age and Condition Considered



Other Services

- **Cleanup Waste Disposal Fee Waiving**
- **Cleanup Waste Transportation**
- **Site Security** (fencing, signage)
- **Dust Control**
- **Clearing, Demolition** (essential for cleanup)
- **Analytical Work** (confirmation sampling)
- **Outreach** (Notice, Meeting Space)



Suggestions

- **Have a Plan**
 - Who, What, Where, When
- **Document, Document, Document**
 - Cost, Benefit, Service, Hours, Value, Rate
 - Basis for Valuation
 - Be Clear and Specific
- **Include in Quarterly Reports**
- **Monitor Status Periodically**



Suggestions (continued)

- **Get Documentation When Cost Share Activity Happens**





Summary

- **Could You Charge it to the Grant?**
- **Remember:**
 - **BROWNFIELDS ADMINISTRATIVE COST BAN**
- **Does it Satisfy “THE BASICS”?**



Questions?

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