- Omni-Circular under 2 CFR 200 & EPA Regulations under 2 CFR 1500:

EPA has officially adopted the OMB Omni-Circular effective **December 26, 2014**. Specifically, in a **joint interim final rule** published in the Federal Register on December 19, 2014 (see 79 Fed. Reg. 76050-76063), EPA adopted the Omni-Circular. This includes adoption of Omni-Circular requirements located at **2 CFR 200** along with EPA-specific provisions mandated by statute, regulation or agency policy now codified under **2 CFR 1500**. OMB's website at **https://cfo.gov/cofar/** is the location for resources regarding the Omni-Circular, including **OMB's Frequently Asked Questions (FAQ)**.

NOTE: The **2 CFR 200 and 1500** apply to all EPA funds awarded on or after December 26, 2014. Also, any new funding through an amendment on or after December 26, 2014, and any unobligated balances (defined at 2 CFR 200.98) remaining on the award at the time of the amendment, will be subject to **2 CFR 200 and 1500**.

Federal Register--Joint Interim Rule:
http://www.gpo.gov/fdsys/pkg/FR-2014-12-19/pdf/2014-28697.pdf
2 CFR 200:
http://www.ecfr.gov/cgi-bin/text-idx?SID=4467ef7edf6418328185fefd45270f1f&node=pt2.1.200&rgn=div5
2 CFR 1500:
http://www.ecfr.gov/cgi-bin/text-idx?SID=ac772c78043ca73b46f5d168dd3f038f&tpl=/ecfrbrowse/Title02/2chapterXV.tpl
OMB's FAQ:
https://cfo.gov/wp-content/uploads/2014/11/2014-11-26-Frequently-Asked-Questions.pdf

- Interim Financial Assistance Conflict of Interest Policy:

In accordance with the Omni-Circular's Conflict of Interest (COI) disclosure requirements under **2 CFR 200.112** , EPA issued the **Interim Financial Assistance Conflict of Interest Policy**. Please review this policy carefully to ensure full compliance. This policy applies to all individuals and non-federal entities requesting and receiving EPA financial assistance on or after **December 26, 2014**. (Note: A standard EPA form is not currently available for the COI disclosure requirement since this is an interim policy.)

Examples of requirements from the policy include:
   - Application: If applicable, applicant must provide a prominently titled conflict of interest disclosure statement attached to the Standard Form (SF) 424.
   - Post Award: The recipient must impose COI inquiry requirements onto their subrecipients, and disclose subrecipient COI's to EPA.

Interim COI Policy:
http://www.epa.gov/ogd/epa_interim_financial_assistance_coi_policy.htm

- Submission of Grant Applications via Grants.gov:

Effective **February 17, 2015**, EPA grant applicants must use **Grants.gov** to submit their applications. It is highly recommended that EPA applicants complete their registration on Grants.gov now, since the entire process can take up to 30 days to complete. Information located at **Submitting an Application to Grants.gov Apply** and **Applicant Resources** for Grants.gov will help you get started. Applicants are also encouraged to view a previously recorded **EPA Information Webinar** session/ presentation regarding Grants.gov or register for an available session.

Grants.gov support/assistance is available 24 hours a day 7 days a week at 1-800-518-4726 or Support@grants.gov. For International callers, call (606) 545-5035 to speak with a Grants.gov Contact Center representative. Also, the **Region 9 Application Checklist** will help ensure your EPA application submitted through Grants.gov is complete.

Guide on Submitting an Application to Grants.gov:
http://www.epa.gov/ogd/guide/submitting.htm
Grants.gov Application Resources:
http://www.grants.gov/web/grants/applicants/applicant-resources.html
EPA Information Sessions/Webinars:

http://www.epa.gov/ogd/training/grants_gov_information_sessions_for_applicants.htm
Region 9 Application Checklist:
http://www.epa.gov/region9/funding/pdfs/grantsgov/r9-application-checklist-grantsgov.pdf

- <u>Bundling of Grant Application Certifications (for States & Tribes):</u>

State and Tribal applicants are highly encouraged to submit <u>annually</u> a single set ("bundling") of application certification forms with a cover letter. The letter must indicate the applicable timeframe (usually a federal or state fiscal year) of the certifications for all EPA grant applications received by Region 9 Grants Management Office (GMO) within that period. GMO accepts Adobe format (.pdf) of the letter with applicable signed certification(s) through the electronic mail box: grantsregion9@epa.gov. Please note that updated forms must be submitted when changes to the responses are required. The following certifications can be bundled:

   ❖ Standard Form (SF) 424B, Assurances for Non-Construction Programs
   ❖ EPA Form 6600-06, Certification Regarding Lobbying, Certification for Contracts, Grants, Loans and Cooperative Agreements
   ❖ EPA Form 4700-4, Preaward Compliance Review Report for All Applicants Requesting EPA Financial Assistance

Applicants are highly encouraged to use bundling of their certifications if multiple EPA applications are submitted annually. Bundling can be especially helpful as EPA is transitioning to Grants.gov. Please contact your EPA Grants Specialist for questions regarding bundling.

EPA Application Forms:
http://www.epa.gov/ogd/forms/forms.htm

- <u>Changes to the Minority & Women Business Enterprise (M/WBE) Utilization Reporting Requirement:</u>

The EPA issued a revised class deviation from **40 CFR 33.502** on **December 4, 2014**, which supersedes the M/WBE reporting requirement specified in the recipient's Notice of Award. The EPA financial assistance recipients are now required to report <u>annually</u> when the amount budgeted for procurement listed in the financial assistance agreement exceeds $150,000, and when certain conditions are met. Please review the current information from **EPA's Small Business Programs**.

40 CFR 33:
http://www.ecfr.gov/cgi-bin/text-idx?SID=04eada1fb1292e21ecf2434ad7bf3781&tpl=/ecfrbrowse/Title40/40cfr33_main_02.tpl
EPA's Small Business Programs:
http://www.epa.gov/osbp/dbe_reporting.htm

- <u>Grants Management Training Materials for Tribal Organizations:</u>

The EPA's Office of Grants and Debarment (OGD) worked with the national Partnership for Environmental Technology Education (NPETE) to develop **training materials for Tribal organizations**. While OGD is no longer able to offer in-person trainings, the training materials, including the training manuals and webinar recordings, are available for download.

Recipient Training:
http://www.epa.gov/ogd/training/recip_train.htm