AGENDA

• Process Changes and Streamlining
  ✓ New Terms and Conditions
  ✓ Conflict of Interest (COI) Policy
  ✓ Grant.Gov (Starting February 17, 2015)
• Grantee Administrative Review Process
• Upcoming Training Opportunities
• Q & A
EPA Guidance
Proposals Submitted
Application Guidance
Grant Negotiations
Application Submitted
EPA Reviews Application

- Application Phase
  - Grant Award
    - On-Going Management
      - Includes: Progress Reports, Communication, Grant Amendments, Advanced Monitoring
      - Compliance & Enforcement
  - Award & Management Phase
    - PO Closes Grant
    - Las Vegas Finance Review
    - GS Closes Grant

- Close Out Phase
Triad of Grants Management

GMO
Grants Management Office

Administrative Requirements

PO
Project Officers
Program Requirements

LVFC
Las Vegas Finance Center
Grant Payment
Grants Outputs/Outcomes

GMO
Grants Management Office
Administrative Requirements
Application, Federal Financial Reports (FFR), MBE/WBE Reports, Post Award Monitoring

PO
Project Officers
Program Requirements
Funding Negotiations, Program Progress Reports, Post Award Monitoring

LVFC
Las Vegas Finance Center
Grant Payments
Payment Requests, ASAP, Final FFR
R9 Grants Information Page!

What’s new and upcoming in the EPA grants arena:

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

• Interim Financial Assistance Conflict of Interest Policy

• Submission of Grant Applications via Grants.gov

• Bundling of Grant Application Certifications/Forms

• Changes to the Minority & Women Business Enterprise (M/WBE) Utilization Reporting Requirements

• Grants Management Training Materials for Tribal Organizations
The following is a brief summary of what’s new and upcoming in the EPA grants arena:

• **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/](https://cfo.gov/cofar/) is the location for resources regarding the Omni-Circular, including OMB’s **Frequently Asked Questions (FAQ).**

• **Interim Financial Assistance Conflict of Interest Policy:**

  In accordance with the Omni-Circular’s Conflict of Interest disclosure requirements under **2 CFR 200.112,** EPA issued the **Interim Financial Assistance Conflict of Interest Policy.** Requirements include applicants providing a prominently titled conflict of interest disclosure statement attached to the SF 424, if applicable. This policy applies to all individuals and non-federal entities requesting and receiving EPA financial assistance **on or after December 26, 2014.**

• **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.
R9 Grants Information Page Summary (con’t)

• Bundling of Grant Application Certifications (for States & Tribes):

State and Tribal applicants are highly encouraged to submit annually 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.

• Changes to the Minority & Women Business Enterprise (M/WBE) Utilization Reporting Requirement

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 annually when certain conditions are met to reach a threshold of $150,000. Please review the current information from EPA’s Small Business Programs.

• Grants Management Training Materials for Tribal Organizations:

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.
Get Registered -
About the eBiz Point of Contact and AORs

- Each organization has one eBiz POC
- eBiz POCs are assigned in SAM.

- The eBiz POC approves Authorized Organization Representatives.
- AORs are allowed to submit grant applications on behalf of their organization.

- One organization can have MANY AORs
Tips for Applicants

Grant Proposal Tips

- **Register and Submit Early**
- Thoroughly read and follow all of the instructions provided by the agency
- Include Sufficient Program and Budget Details
- Strongly recommend filling out optional forms in the app package

Grants.gov Application Tips

- Limit Application File Size/ File Name Characters (50 or less)
- Use Correct DUNS Number in the SF-424 Cover Page
- Make sure you have Grants.gov compatible software (Adobe Reader)
Contact Center

- Support available 24/7
- Email: support@grants.gov
- Toll-Free Phone Number: 1-800-518-4726
- International Callers 1-606-545-503
- Self-help iPortal: (http://grants.gov/iportal)

Additional Resources

- Grants.gov Applicant Training Video
- FAQs
- User Guides
Grants Management Office Reviews

There are two types of reviews:

1. Annual Single Audit – conducted by an independent auditor
2. EPA Administrative & Financial Review – which is conducted by an EPA contractor or the Region 9 Grants Management Office

**Common Issues:**

- Lack of Source Documents
- Financial & Administrative Systems
- Terms and Conditions Reporting
- Record Retention
- Timekeeping
Common Review Findings

Supporting Documentation
Source documentation lacks sufficient information (e.g., timesheets do not reflect actual hours worked or do not delineate the hours worked on various federal and nonfederal projects; no contracts for contractors; travel authorizations not signed by approval official or insufficient justification; etc.)

Tracking Multiple Grants
Inappropriate accounting system (e.g. financial records do not delineate various funding sources, whether they be federal or non-federal)

Internal Controls
Internal policies and procedures do not ensure “checks and balances” (e.g., no segregation of various duties, approval official also acts as accounts payable official, etc.).

Written Policies and Procedures
No written policies/procedures for payroll/time and attendance procurement, travel, inventory, etc. or policies and procedures are not followed.
Upcoming Events/Activities FY15

• Region 9 Grants Information Page

• Administrative Technical Support

• Training Opportunities:
  ➢ February 10, 2015 Webinar on Grants.gov & GAP On-Line

➢ Training Materials for Tribal Organizations: http://www.epa.gov/ogd/training/grants_management_training_materials_for_tribal_organizations.htm
What would you like to learn about?

• Next RTOC Conference
  – Suggestions:
    • Overview of our IG Audits and Administrative Reviews
    • Overview of Unliquidated Obligations – slow drawdowns, process of closing grants
    • Other topics?