

## Proposal Guidelines for Brownfields Job Training Grants









Recycled/Recyclable Printed with Soy/Canola Ink on paper that contains at least 50% recycled fiber

Solid Waste and Emergency Response (5105T)

#### Table of Contents

Overview of EPA's Brownfields Job Training Grants	3
What are Brownfields?	
Background	
EPA's Brownfields Financial Assistance Program	4
Section I. Funding Opportunity Description	4
1.1. Applicant Eligibility	4
1.2. Authority for Brownfields Job Training Grants	5
1.3. Eligible Uses of EPA Funds	
1.4. Prohibited Uses of EPA Brownfields Job Training Grant Funds	6
Section II. Award Information	6
Section III. Eligibility Information	7
3.1. Threshold Eligibility Criteria	
Section IV. Application and Submission Information	7
4.1. Deadlines	
4.2. General Proposal Requirements	
4.3. Proposal Submission Schedule	8
4.4. Availability of Pre-Application Assistance	
4.5. Overview of Evaluation of Proposals	9
Section V. Application Review Information	9
5.1. Ranking (Evaluation) Criteria 1	0
Section VI. Award Administration Information 1	0
Section VII. Agency Contacts 1	11
Section VIII. Job Training Proposal Guidelines 1	1
8.1. Cover Page	11
8.2. Threshold Criteria 1	
8.3. Ranking Criteria	3
Appendix 1. EPA Regional and Headquarters Contacts 1	9
Appendix 2. Prohibitions on Use of Funds 2	21

## **Overview of EPA's Brownfields Job** Training Grants

#### What are Brownfields?

These guidelines are provided pursuant to the Catalog of Federal Domestic Assistance Number 66.815. The Small Business Liability Relief and Brownfields Revitalization Act ("Brownfields Law" or "the Law," P.L. 107-118) allows the U.S. Environmental Protection Agency (EPA) to fund training to facilitate assessment, remediation, or preparation of brownfield sites. A brownfield site is "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant," as defined in section 101(39) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA or Superfund). The law further defines the term "brownfield site" to include a site that "is contaminated by a controlled substance...; is contaminated by petroleum or a petroleum product excluded from the definition of 'hazardous substance'...; or is mine-scarred land." Applicants for these brownfields job training grants must be either eligible governmental entities as defined in CERCLA section 104(k)(1) or eligible nonprofit organizations as defined in Public law 106-107, the Federal Financial Assistance Management Improvement Act. Please note that State and certain Indian Tribal recipients of grants under CERCLA section 128 are also eligible to apply for these job training grants.

Eligible applicants must also *propose to serve* a community that currently receives, or has received, financial assistance from EPA for brownfields assessment, revolving loan fund or cleanup competitive grants. For a complete listing of existing EPA-funded brownfield grant areas, please visit: http://www.epa.gov/brownfields/plocat.htm

One exception to the requirement above is that States and certain eligible Indian Tribes (see section 1.1 Applicant Eligibility below) currently receiving CERCLA section 128 funding may propose to serve any community within their jurisdiction where the State or Indian Tribe is conducting site-specific brownfield work (e.g., assessment or clean up activities) with State, Indian Tribal or Federal CERCLA section 128 funds.

#### Background

In the early 1990s, stakeholders expressed concerns to EPA that more than 600,000 properties that were once used for industrial, manufacturing, or other commercial uses were lying abandoned or underused due to the actual or perceived presence of contamination. Brownfield areas, particularly those in city centers, were contributing to blight and joblessness in surrounding communities. Unknown environmental liabilities were preventing communities, developers, and investors from restoring these properties to productive use and revitalizing impacted neighborhoods.

In 1994, EPA responded to the brownfields problem with an approach that is locally based, encourages strong public-private partnerships, and promotes innovative and creative ways to assess, clean up, and redevelop brownfield sites. This approach empowers state, tribal, and local environmental and economic development officials to oversee brownfield activities. It encourages implementing local solutions to local problems. EPA also has provided funding to create local environmental job training programs to ensure that the economic benefits derived from brownfields revitalization efforts remain in local neighborhoods.

A critical part of EPA's efforts to encourage assessment and cleanup of brownfields is participation by affected residents. In addition, EPA works to ensure that disadvantaged residents do not bear a disproportionate burden of the effects of environmental contamination. To help residents take advantage of jobs created by the assessment and cleanup of brownfields, EPA initiated the Brownfields Job Training Grants.

In 2002, the Brownfields Law authorized funding for a national Brownfields Job Training Grants Program. This program incorporated many of the goals and objectives for job training grants as described above.

#### **EPA's Brownfields Financial Assistance Program**

EPA's Brownfields Program is an organized commitment to help communities revitalize brownfield properties both environmentally and economically, mitigate potential health risks, and restore economic vitality to areas where brownfields exist. Successful cleanup and redevelopment of brownfields are proof that economic development and environmental protection can indeed coexist. As a part of the Brownfields Economic Redevelopment Program, EPA has funded 82 job training grants totaling \$13.1 million. As of Summer 2004, more than 2,000 people had completed training; and more than 1,200 obtained employment in the environmental field with an average hourly wage of \$12.83.

## Section I. Funding Opportunity Description

EPA is requesting proposals for brownfields job training grants. This is a competitive grant program managed in accordance with EPA Order 5700.5 "Policy for Competition in Assistance Agreements," conducted under a ranking system established under the Brownfields Law (P.L. 107-118). The goals of the Job Training Program are to prepare trainees for future employment in the environmental field and facilitate cleanup of brownfield sites contaminated with hazardous substances, pollutants, or contaminants and petroleum.

#### 1.1. Applicant Eligibility

Applicants must be either eligible governmental entities as defined in CERCLA section 104(k)(1) or eligible nonprofit organizations as defined in Public Law 106-107, the Federal Financial Assistance Management Improvement Act.

Eligible governmental entities include a general purpose local unit of government; a land clearance authority or other quasi-governmental entity that operates under the supervision and control of, or as an agent of, a general purpose unit of government; a governmental entity created by a state legislature; a regional council or group of general purpose units of local government; a redevelopment agency that is chartered or otherwise sanctioned by a state; a state; an Indian Tribe (other than in Alaska), or an Alaskan Native Regional Corporation and an Alaska Native Village Corporation as those terms are defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1601 and following); and the Metlakatla Indian Community. EPA welcomes and encourages proposals from coalitions of such entities, but a single eligible entity must be identified as the legal recipient. Intertribal consortia, except consortia comprised of ineligible Alaskan tribes, are eligible to apply as well.

Eligible nonprofit organizations include any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest; is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. Workforce Investment Boards that meet these criteria may be eligible nonprofit organizations. Public and nonprofit private educational institutions are eligible to apply. However, nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are *not* eligible to apply.

*For-profit or proprietary training organizations or trade schools are not eligible to apply*. Evidence of current nonprofit status under Federal, state or tribal law must be provided at the time of application.

Please also see section 1.3 "Eligible Uses of EPA Funds" and section 8.2.B "Threshold Criteria, Applicant Eligibility," for related eligibility information that may affect your decision to apply this year.

#### **1.2. Authority for Brownfields Job Training Grants**

Funding for National Brownfields Job Training Program grants is authorized under CERCLA section 104(k)(6), 42 U.S.C. section 9604(k)(6). This statute authorizes EPA to provide, or fund eligible entities or nonprofit organizations to provide, training, research, and technical assistance to individuals and organizations, as appropriate, to facilitate assessment, remediation, or preparation of brownfield sites. EPA awards grants authorized by section 104(k) under a ranking system that includes factors relating to institutional capacity; training program objectives and plans; budget, schedule and leveraging; community involvement and partnerships; measures of success; ability to manage grants; and, community need.

#### 1.3. Eligible Uses of EPA Funds

Project proposals must conform to the following guidelines:

- Grant funds may be used to train residents for the handling and removal of hazardous substances, which includes training for jobs in sampling, analysis, and site remediation.
- Funds also may be used for the following: 1) training in the management of facilities at which hazardous substances, pollutants, contaminants or petroleum contamination are located; 2) training for response activities often associated with cleanups—for example, landscaping, demolition, and groundwater extraction; and 3) development/refinement of existing curriculum for the training described in this paragraph.
- Grant funds may be used for training participants in the use of techniques and methods for cleanup of leaking underground storage tanks and other sites contaminated by petroleum products, asbestos abatement, or lead abatement where these topics are a component of a more comprehensive hazardous waste and substance management training course or environmental technology training course.
- Grant funds may be used to recruit job training participants from communities impacted by brownfields and for outreach activities directed toward engaging prospective employers to be involved in the job training program. These activities should be part of improving participation in hazardous waste and substance management training for communities impacted by brownfields. *Proposed training programs must establish procedures to ensure that participants are recruited from the neighborhoods where*

the brownfield site(s) are located and graduates from their training programs are employed in assessing and cleaning up environmentally contaminated sites.

• Eligible applicants must also *propose to serve* a community that currently receives, or has received, financial assistance from EPA for brownfields assessment, revolving loan fund or cleanup competitive grants. For a complete listing of existing EPA-funded brownfield grant areas, please visit: http://www.epa.gov/brownfields/plocat.htm

One exception to the requirement above is that States and certain eligible Indian Tribes (see section 1.1 "Applicant Eligibility" above) currently receiving CERCLA section 128 funding may propose to serve any community within their jurisdiction where the State or Indian Tribe is conducting site-specific brownfield work (e.g., assessment or clean up activities) with State, Indian Tribal or Federal CERCLA section 128 funds.

## **1.4. Prohibited Uses of EPA Brownfields Job Training Grant Funds**

- Grant funds are intended for job training activities and may *not* be used for conducting site assessments or actual cleanups outside the context of on-the-job training. Grant funds may *not* be used for conducting response activities often associated with cleanups—for example, landscaping, demolition, and groundwater extraction— except within the context of on-the-job training assignments. *Assessment, cleanup, and associated activity costs must be funded through other means.*
- Grant funds may *not* be used for general or life skills education activities, such as remedial classes in math and reading; job readiness training, such as developing resumes and acquiring interview skills; job placement costs; GED costs; transportation costs, such as the costs of getting to and from class, or stipends for students; web site development; vehicle or medical insurance; or, child care costs.
- Grant funds may *not* be used for costs that are unallowable (e.g., lobbying, fund-raising) under OMB Circulars A-21 (universities), A-87 (state, tribal, and local governments), or A-122 (nonprofit organizations), as applicable.
- Grant funds may *not* be used to match any other federal funds unless there is specific statutory authority for the match. CERCLA does not provide this authority. However, grant funds may be used to match state or local funds if authorized by the relevant state statute or local ordinance.
- Under the Brownfields Law, *grant funds may not be used for administrative costs*. See *Appendix 2* for details on this important prohibition.

### **Section II. Award Information**

EPA will award up to \$200,000 per job training grant. If an applicant submits a proposal for amounts that exceed \$200,000, EPA will not consider those proposals. Depending on the availability of funds, EPA expects to select approximately 10 Brownfields Job Training Grants by the end of April 2005. However, EPA reserves the right to fund successful proposals at lower amounts depending on the availability of EPA funds, applicant access to other sources of funds, quality of applicant proposals, and needs of the community. EPA reserves the right to reject any or all proposals or applications and make no awards.

## Section III. Eligibility Information

#### 3.1. Threshold Eligibility Criteria

In your proposal, you must clearly state your responses to these threshold eligibility criteria: a) location of the proposed project; b) applicant eligibility; c) demonstration of non-duplication with other Federally funded job training programs; and d) proposal request dollar amounts not to exceed \$200,000. If your responses fail to meet any threshold eligibility criterion, then your proposal will not be considered further. However, EPA may seek clarification from an applicant regarding its responses to threshold criteria.

Please refer to the section below entitled "Job Training Proposal Guidelines" for a detailed discussion of each of these threshold eligibility criteria.

# Section IV. Application and Submission Information

#### 4.1. Deadlines

*Proposals must be postmarked by the United States Postal Service (no private meters) or hand delivered to the address below by January 14, 2005.* Failure to meet the deadline will result in the proposal being eliminated from the competition.

#### 4.2. General Proposal Requirements

All materials included in the proposal (including maps and other attachments) must be printed on *letter-sized paper* (8<sup>1</sup>/<sub>2</sub>" by 11") and font sizes must be no smaller than 11 points. Proposals received by EPA will be copied and distributed to appropriate reviewers; therefore, **do not use binders nor color printing**. Proposals must not be more than 15 single-sided pages in length, not including the cover letter and attachments. **Only the first fifteen pages of a proposal (not including cover page) and appropriate and relevant attachments will be photocopied for evaluation.** Photos and graphics will not be considered.

Proposals must be concise and well organized, and must provide the information requested in the guidelines, including responses to each criterion. Factual information about your proposed project and community must be provided. Do not include discussions of broad principles that are not specific to the proposed work or project covered by your proposal. Responses to criteria must include the criteria number and title but need not restate the entire text of the criteria. Electronic copies of these guidelines can be obtained from the EPA Brownfields web site (www.epa.gov/brownfields) or by contacting your Regional Brownfields Contact listed in *Appendix 1*.

Note: Applicants must clearly mark any information they consider to be proprietary, confidential business information. If marked information is requested from EPA under the Freedom of Information Act, EPA will follow the provisions of 40 CFR Part 2, Subpart B.

7

Successful grant applicants must provide, in addition to the SF 424, a Dun and Bradstreet Data Universal Numbering System (DUNS) number, which is now required when applying for federal grants or cooperative agreements on or after October 1, 2003. For more information, go to <u>www.grants.gov</u>.

#### 4.3. Proposal Submission Schedule

November 2004	Announcement of funding availability
January 14, 2005	Proposals due to EPA
May 2005	Announcement of Grants

Submit **two copies** of your proposal, including attachments, to: Mr. Don West, Environmental Management Support, Inc., 8601 Georgia Avenue, Suite 500, Silver Spring, MD 20910, phone 301-589-5318.

In addition, submit **one copy** of your proposal, including attachments, to your EPA Regional Brownfields Contact (listed in *Appendix 1*).

Proposals must be postmarked by the United States Postal Service (no private meters), or hand delivered to the address below, by January 14, 2005.

Mail your proposal to:

Mr. Don West Environmental Management Support, Inc. 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910

OR

Overnight your proposal to:

Mr. Don West Environmental Management Support, Inc. 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910 phone 301-589-5318

Note: Overnight mail must include Mr. Don West's phone number in the address.

#### 4.4. Availability of Pre-Application Assistance

EPA Regional Brownfields staff may respond to individual questions regarding threshold eligibility requirements, but will not provide assistance on applicant responses on ranking evaluation criteria. Agency

personnel will not review draft proposals. Significant questions and answers will be posted on the EPA website: www.EPA.gov/brownfields, under Job Training Grants. Parties wishing to submit additional questions concerning threshold eligibility criteria may do so via the United States Postal Service by addressing their comments to: Ms. Myra Blakely, U.S. Environmental Protection Agency, Office of Brownfields Cleanup and Redevelopment, MC-5105T, 1200 Pennsylvania Avenue, NW, Washington, DC 20460, or via email to <u>blakely.myra@epa.gov</u> Hand deliveries should be sent to Ms. Myra Blakely, U.S. Environmental Protection Agency, Office of Brownfields Cleanup and Redevelopment, MC-5105T, 1200 Pennsylvania Avenue, NW, Washington, DC 20460, or via email to <u>blakely.myra@epa.gov</u> Hand deliveries should be sent to Ms. Myra Blakely, U.S. Environmental Protection Agency, Office of Brownfields Cleanup and Redevelopment, Room 2406, 1301 Constitution Avenue, NW, Washington, DC 20460, phone 202-566-2777.

#### 4.5. Overview of Evaluation of Proposals

National Brownfields Job Training Program grants are awarded to the highest ranking applicants, as determined by EPA under a competitive ranking system. Evaluation panels consisting of EPA Regional and Headquarters staff and other federal agency representatives will evaluate the proposals and make recommendations to EPA senior management.

The evaluation panels will assess how well the proposals meet the evaluation criteria outlined below. There are two different types of criteria–*threshold criteria* and *ranking criteria*. Threshold and ranking criteria are clearly identified in the guidelines. *If an applicant fails to provide complete responses to the threshold criteria outlined in the guidelines, the proposal will fail and will not be evaluated further*. However, EPA Regions may seek clarification from an applicant regarding its responses to threshold criteria. EPA will advise applicants that it determines to be ineligible within 30 days of EPA decisions on threshold eligibility criteria.

Proposals must be clear and concise and strictly follow each of the criteria. Sufficient detail must be provided for the panel to evaluate the merits of each proposal and decide which proposals best support the intent of the grant program. Vague descriptions, redundancy, and failure to propose a comprehensive environmental training program covering all student needs may result in a lower ranking. Incomplete proposal packages or packages inconsistent with the instructions will affect your score.

An EPA national panel will score each eligible proposal on the basis of the ranking criteria summarized below. Scores on each ranking criterion will be totaled to determine proposal rankings. EPA will not seek clarification of responses to ranking criteria. The panel's recommended rankings of the proposals will be considered by senior agency approval officials, who will make the final selection of proposals after considering the recommendations of the review panel and other policy considerations listed in Section V below. EPA will inform successful and unsuccessful applications within 60 days of final decisions.

## **Section V. Application Review Information**

As discussed above, an EPA national panel will score each eligible proposal on the basis of the ranking criteria summarized below. Please refer to Section VIII, entitled "Job Training Proposal Guidelines," for a detailed discussion of these ranking criteria.

EPA senior agency approval officials will consider the recommended rankings of the review panel as well as other policy considerations such as geographic distribution of funds between urban and non-urban areas and among EPA's ten Regions, designation as a federal Empowerment Zone, Enterprise Community, or Renewal Community; population; whether the applicant is a federally recognized Indian tribe; and, whether the

proposed project may assist to address environmental justice concerns (such as the disproportionate impact on, or presence of brownfields sites near, low-income and/or minority citizens). EPA Regions may provide an advisory score to the evaluation panel on an applicant's response to the "Ability to Manage Grants" ranking criterion. This advisory score may take into account the Region's experience, if any, with the applicant's performance on grants managed by the Region.

Although EPA has decided not to require recipients to provide program funding through a specific matching formula, EPA will take into account the extent to which recipients demonstrate the ability to "leverage" funds when evaluating and ranking proposals.

#### 5.1. Ranking (evaluation) Criteria

In your proposal, you must clearly state your responses to these ranking criteria, which are weighted in importance by the number of points assigned to each in parentheses. (*Please see Section VIII, entitled "Job Training Proposal Guidelines," for a detailed discussion of these ranking criteria.*)

- A. Institutional Capacity (a maximum of 15 points may be received for this criterion).
- B. Training Program Objectives and Plans (a maximum of 20 may be received for this criterion).
- C. Budget, Schedule, and Leveraging (a maximum of 15 points may be received for this criterion).
- D. Community Involvement and Partnerships (a maximum of 15 points may be received for this criterion).
- E. Measures of Success (a maximum of 10 points may be received for this criterion).
- F. Ability to Manage Grants (a maximum of 15 points may be received for this criterion).
- G Community Need (a maximum of 10 points may be received for this criterion).

## Section VI. Award Administration Information

Funding will be awarded as a cooperative agreement. EPA anticipates substantial involvement with the cooperative agreement recipient. EPA will ask the successful applicants to submit a final cooperative agreement application package to their EPA Regional office. This package will include an EPA-approved final work plan that describes the work to be performed, including a final budget, and the required certification forms. Cooperative agreements approved under this final selection step will include terms and conditions. These terms and conditions will be binding on the grant recipient. Applicants will also be required to submit progress reports in accordance with grant regulations found in 40 CFR 30.51 or 40 CFR 31.40. The EPA Regional Brownfields Coordinators and Regional Grants Specialists will work closely with the applicants to process and finalize the cooperative agreement package. **Proposal funding is not guaranteed at any stage of the proposal process until the Cooperative Agreement, including workplan, is completed and the final award is made**. **EPA reserves the right to reject all proposals and make no awards.** EPA reserves the right to fund successful proposals at lower amounts depending on the availability of EPA funds, applicant access to other sources of funds, quality of applicant proposals, and needs of the community.

Any disputes regarding proposals or applications submitted in response to these guidelines will be resolved in accordance with 40 CFR 30.63 and Part 31, Subpart F.

In accordance with Executive Order 12372, EPA encourages applicants to contact their State Intergovernmental Review Office early so that the required intergovernmental review process may begin immediately upon selection by EPA. If the state does not have an Intergovernmental Review Office, the successful applicant must provide notice of the proposed agreement directly to affected state, area-wide, regional and local entities. Contact your Regional Brownfields Contact for assistance, if needed. (See Appendix 1.)

## **Section VII. Agency Contacts**

Please refer to **Appendix 1. EPA Regional and Headquarters Contacts** of the proposal guidelines for your EPA Regional Brownfields Contact.

# Section VIII. Job Training Proposal Guidelines

#### 8.1. Cover Page

The cover page is intended to identify the brownfields job training and development pilot applicant and a contact for communication with EPA. This should be one page and in the format of your choice.

- A. Applicant Identification: Provide the name and full address of the entity applying for funds. This is the agency or organization that will be receiving the grant and be accountable to EPA.
- B. Location: City, county, and state or reservation, tribally owned lands, tribal fee lands, etc. of the brownfields community(ies) that you propose to serve. Include the names, addresses, and phone numbers of: the mayor, county executive, governor, tribal chair, etc., for the brownfields community that you propose to serve.
- C. Contacts: Please provide name, phone/fax numbers, e-mail address, and mailing address of the project director and head of organization responsible for the project proposal. These individuals may be contacted if other information is needed.
- D. Date Submitted: Date when the proposal is postmarked or sent to EPA via registered or tracked mail.
- E. Project Period: Project period must not exceed two years.
- F. Population: 1.) Provide the general population of your jurisdiction. 2.) If you are not a municipal form of government, provide the population of the area addressed by this proposal. Tribes must provide the number of tribal/non-tribal members affected.
- G Other: Indicate whether you are a federally recognized tribe; federally designated Empowerment Zone/ Enterprise Community; or, federally designated Renewal Community.
- H. Cooperative Partners: Provide names and phone numbers of individuals and organizations that have agreed to participate in the implementation of the project.

Please note that financial transactions with cooperative partners that involve EPA funding will be subject to compliance with applicable EPA assistance regulations relating to procurement and subgrants. Successful applicants may award subgrants that meet the requirements of 40 CFR 30.2(ff) or 40 CFR 31.3 *Subgrant*.

*Recipients may only award subgrants to eligible entities or nonprofit organizations as described in applicant eligibility section above.* The EPA Brownfields program has determined that awarding subgrants to for-profit organizations would be inconsistent with the Agency's purpose in awarding financial assistance for Brownfields job training. Successful applicants must follow competitive procurement procedures in 40 CFR Parts 30 or 31, as applicable, when acquiring commercial goods and services. (To access this Code of Federal Register information, please visit: http://www.access.gpo.gov/nara/cfr/waisidx\_03/40cfr30\_03.html).

#### 8.2. Threshold Criteria

Clearly state your responses to these threshold criteria. If your responses fail to meet any threshold criterion, then your proposal will not be considered further.

A. Location of the Proposed Project

Identify the EPA-funded brownfields grant (assessment, RLF, or cleanup) in your project area.

If you are a State or certain eligible Indian Tribe (see section 1.1 "Applicant Eligibility" above) currently receiving CERCLA section 128 funding, and you are proposing to serve a community where you are conducting site-specific brownfields work with State, Indian Tribal or Federal CERCLA section 128 funds, then identify the community you propose to serve with your project.

B. Applicant Eligibility

Describe how you are an eligible applicant for the job training grant. (See description of eligible applicants in Section 1.1.) Applicants that received a Brownfields Job Training grant from EPA in Fiscal Year 2003 (announced May 2003) or in Fiscal year 2004 (announced March 2004) are not eligible to apply. A list of brownfields job training grants awarded in Fiscal Year 2003 or in Fiscal year 2004 can be found on the Brownfields website, <u>http://www.epa.gov/brownfields/pilot.htm#previous</u>.

Evidence of current nonprofit status under federal, state or tribal law must be provided at time of application.

C. Demonstration that Proposal Does Not Duplicate Other Federally Funded Environmental Job Training Programs

Applicants must demonstrate that the proposed training project does not duplicate other federally funded programs for environmental job training in their target community. For example, applicants must demonstrate that the proposed training project does not duplicate National Institute of Environmental Health Sciences (NIEHS) hazardous waste management training programs in their target community. NIEHS maintains a list of their worker training grantees on their web site, <u>http://www.niehs.nih.gov/wetp</u> If you are listed on this website as a recipient, you must demonstrate how services under this proposed project will complement but not duplicate existing federal job training activities in your targeted service area, i.e., different target audience, etc. You must undergo similar analyses for other federally funded job training programs serving the area or community(ies) in your proposal.

D. Proposal Requested Dollar Amounts

EPA will award up to \$200,000 per job training grant. Therefore, applicants must submit proposals for EPA grant amounts equal to or less than \$200,000. If an applicant submits a proposal for EPA amounts over \$200,000, EPA will not consider those proposals.

#### 8.3. Ranking Criteria

- A. Institutional Capacity (a maximum of 15 points may be received for this criterion)
  - 1. Describe your experience and the experience of your partners in providing employment and training programs, and in providing environmental job training. Include in your description your success in recruitment, training, and job placement as well as your instructors' experience with the curriculum and target population. Include the names of your instructors as an attachment.
  - 2. Briefly describe the project management system that will support the coordination of activities, troubleshooting, and problem-solving as necessary to recruit, screen, train, place, and track participants.
  - 3. Describe your experience in working with employers to provide employment for your programs' participants. Identify at least three employers who have hired participants in your job training programs. Provide these employers' names and phone numbers, since these employers will be contacted by EPA during the proposal evaluation process. If your organization already has experience working with environmental employers, provide specific examples, including names and phone numbers of these employers. EPA will contact these employers during the proposal evaluation process.
- B. Training Program Objectives and Plans (a maximum of 20 points may be received for this criterion).
  - 1. Describe the objectives of your proposed project. Specify: 1) how many participants you expect to train through this grant; 2) number of training cycles; how many hours per cycle; names of courses; when and where you plan to conduct training classes; 3) your targeted placement rate at jobs that bear a direct correlation to the training received.
  - 2. Describe the criteria you will use to screen prospective trainees for entrance into your program. Describe your plans for retaining your program trainees until they complete your program.
  - 3. Discuss your partnerships with local community groups, labor unions with apprenticeship programs, Workforce Investment Boards, and academic institutions, located in or near the brownfield community. Describe the value that each of these partners will add to your program. Briefly describe the prerequisite skills or knowledge (e.g., life skills training, pre-employment training, GED preparation) to be provided by these partners.
  - 4. Explain your current job development strategies. Describe current brownfield assessment and cleanup activities ongoing in your target community. Describe your strategy to market to environmental employers. If applicable, describe strategies to market to employers associated with the ongoing assessment and cleanup activities listed above.
  - 5. Describe how you will ensure that the curriculum meets employers' needs. Describe how the employer community (for example, local businesses, environmental contractors, brownfield site owners) has been involved in the development of the proposed training. This involvement could include curriculum development, advisory councils, apprenticeships, and mentoring. Letters of support must be provided to document commitments. These organizations will be contacted by EPA during the evaluation process.
  - 6. Provide a course outline as an attachment and include a list of training tools and materials that will be provided to trainees. List and describe certifications (e.g., OSHA health and safety training for

13

hazardous waste workers, lead abatement, asbestos abatement) graduates will earn. Indicate whether your organization or collaborative partners are approved to provide such certification, and explain how any exam fees will be covered. *See Eligible uses of EPA Funds section*.

- 7. Describe any local incentives or other mechanisms for encouraging employment of local residents (e.g., first source or local hire ordinances for contractors of public agencies, tax incentives for local hire, wage subsidies, or other mechanisms).
- 8. Describe the proximity of residents from the identified community to the training facilities and their means of access to these training facilities.
- C. Budget, Schedule, and Leveraging (a maximum of 15 points may be received for this criterion).
  - 1. Provide a comprehensive proposed budget for your training project. This should include cost estimates for each of the proposed project activities to be conducted using EPA funds. Describe in detail plans for managing the budget. *EPA does not require that applicants include a match or cost share, however evidence of leveraged funds is encouraged.*

Although EPA grant funds may be used for outreach, curriculum development, personnel, equipment, and supplies, emphasis should be placed on delivery of training. Please note that the Brownfields law prohibits any part of a grant or loan awarded under CERCLA section 104(k) for the payment of administrative costs. Thus, EPA project funding in your budget must reflect eligible programmatic costs. For example, personnel costs listed below must be programmatic costs, e.g., costs for instructors' salaries (*See Appendix 2. Prohibitions on Use of Funds*).

Note: Under OMB Circulars, EPA financial assistance cannot be used for fund-raising. Therefore, any costs associated with fund-raising must not be included in the budget for your proposal or charged to your EPA cooperative agreement if your proposal is successful. In addition, you must make clear in any solicitation for funds, that your organization, and not EPA, is asking for funding. You cannot imply that EPA endorses any fund-raising activities in connection with your project. You must also make clear to donors that any gift to the recipient for use in connection with brownfields training, research, and/or technical assistance will go solely toward defraying your expenses, not those of EPA. The following is a suggested budget format:

Project Funding	Instruction	Outreach	Other Tasks	Total
EPA Project Funding				
Personnel (Program Management)				
Fringe benefits				
Progress or performance reporting				
Travel				
Contractual <sup>1</sup>				
Supplies				
Other (please be specific)				
Total EPA Funds				
Non-EPA Project Funding				
Administrative Costs				
Other (please be specific)				
Total Non-EPA Funds				

- 2. Budget Narrative. A budget narrative must accompany the budget and explain each activity, including how it relates to the objective of providing environmental training. Describe how each activity and cost is relevant to the EPA funding authority by describing the programmatic nature or function of each cost.
- 3. Leveraged Funds. There are no match or cost-sharing requirements. In evaluating and ranking proposals, however, EPA will take into account the extent to which recipients demonstrate the ability to "leverage" funds. Demonstrate how you will leverage funding to develop an integrated training program. Provide a detailed description that clearly explains how funds and other resources provided by collaborative partners will complement EPA grant funds and support recruitment, job readiness, and placement. Clearly define each partner's role in complementing and supporting your training program. Distinguish between how EPA funds will be used and how funds or other resources from the partners will be used (e.g., DOL-financed life-skills training). Letters of support must be provided to document commitment from partners.

Describe how leveraged funds and other resources will support the project. For example, provide details on how you intend to fund life-skills training, pre-employment training, counseling, child care, academic enhancement, placement assistance, transportation assistance, and other activities not funded by this grant.

<sup>&</sup>lt;sup>1</sup>Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for nonprofits, with 40 CFR 30.40 through 30.48.

- D. Community Involvement and Partnerships (a maximum of 15 points may be received for this criterion).
  - 1. Describe your partnership with the EPA brownfields grant recipient in your grant area. Address how this partnership will foster future employment for job training graduates.
  - EPA believes that early community involvement in the development of the proposal and throughout the project is necessary and critical to the success of a job training program. Describe your efforts to involve the community in the development of this proposal. Provide the names and phone numbers of neighborhood- and community-based organizations you are working with. Letters of support must be provided to document commitments from the organizations. These organizations will be contacted by EPA during the evaluation process.
  - 3. Describe how the proposed project addresses environmental justice considerations and addresses issues faced by low-income, minority, or socio-economically disadvantaged populations within your target community.
  - 4. EPA encourages partnership and communication between job training/ employment staff and state or Indian tribal environmental program staff. Therefore, you must also provide with your application a copy of a letter you sent to the appropriate state or tribal environmental program contact referenced below. In this letter, you must inform the state or tribal environmental program contact of your plans to apply to EPA for a brownfields job training grant and provide a brief description of the brownfields community that you propose to serve with your application. The purpose of this letter is to initiate and facilitate dialogue between the job training grant applicant and the state or tribal environmental program contact about potential job placement opportunities in planned and/or ongoing brownfields assessment and cleanup activities.

You must include a copy of your dated and signed letter described above with the job training application that you submit to EPA to demonstrate your efforts to partner with state and tribal environmental program staff. Failure to provide your signed and dated letter will result in you not receiving the maximum points for this criterion. If you are a State or certain eligible Indian tribe (see section 1.1 Applicant Eligibility above) currently receiving CERCLA section 128 funding, you are not required to include this letter.

For a list of state and Indian Tribal environmental program contacts, please visit: *http://www.epa.gov/brownfields/stcntct.htm* 

- E. Measures of Success (a maximum of 10 points may be received for this criterion).
  - 1. Define success in terms of your project goals. Goals should be specific, measurable, realistic, and within a specific time frame.
    - a. State your objectives and milestones for the end of each term listed: six months, one year, 18 months, and two years (final closeout report due). This description should include a narrative. Provide a timetable showing start and completion dates for significant tasks.
    - b. Describe how your organization will ensure sustainable employment, including initial job placement, retention and continuous employment. Describe job placement and tracking strategies and identify the responsible entity and the source of funding (non-EPA) for this. Describe job search support and resources available to participants, how these are accessed and when they are available. Also describe how graduates will be tracked and the target time frame for tracking (*at least one year*).

- c. Describe evaluation measures that will be used to identify program implementation issues, e.g., issues with the training and attrition. Describe how the compatibility of the curriculum to employer needs will be assessed to determine whether training is meeting employers' needs.
- d. List the reports or other deliverables you plan to provide to EPA as documentation of your project's progress and success. Please note that EPA requires quarterly reports including key measures (needed for statistical data collection) or other indicators of a successful job training program.
- e. Provide a strategy for continuation of training after original funding has been exhausted.
- F. Ability to Manage Grants (a maximum of 15 points may be received for this criterion).
  - 1. Describe your ability to manage this grant and oversee the work, or describe the system(s) you have in place to acquire the requisite expertise.
  - 2. Describe prior experience in managing federal grants. You must identify and provide information regarding the status of any adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal, or local government inspector general or similar organization, or audits conducted by the U.S. General Accounting Office. You also must note whether you are, or have previously been, required to comply with special "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.
  - 3. Briefly detail original goals and planned project accomplishments, including, for job training funding, the number to be recruited, trained, and placed. Describe how you met or exceeded your originally proposed goals and planned accomplishments by detailing the actual numbers of recruited, trained and placed that you reported to EPA, and compare those with your originally proposed goals and planneds. Briefly explain need for additional funding and explain how the activities proposed today relate to the previous work plan.

If you are, or have been, a recipient of an EPA Brownfields cooperative agreement(s), provide information regarding your compliance with quarterly progress reports, brownfields reporting measures, and annual financial status reporting.

Note: If you have not previously received Federal funds, you may provide a history of your past performance with private funding, or funding awarded by state, tribal or local governments. Applicants who have not performed projects with outside financing may provide information regarding academic or community projects.

- G Community Need (a maximum of 10 points may be received for this criterion) *The purpose of this section is to provide evidence of need. Demonstrate the impact on the targeted community.* 
  - 1. Describe the target community you propose to serve under this project. Include demographic information and indicators, such as the poverty rate and the unemployment rate. Demonstrate the impact that the presence of these indicators has on the targeted community. If referencing a site(s), discuss how the presence of these indicators affects the whole community and not just the immediate site impacts.
  - 2. Describe the current brownfields challenges of your targeted community, including environmental, economic, and social issues.

3. Describe the demand for future employers to hire local residents to fill environmental jobs. Also describe the skills potential employers will need. Also describe potential Brownfields activities that indicate increased demand for skilled environmental workers.

## Appendix



### EPA Regional and Headquarters Contacts

Regions	States	Address and Phone Number
EPA Region 1 Chris Lombard	CT, ME, MA, NH, RI, VT	One Congress Street, Suite 1100 (Mailcode HIO) Boston, MA 02114-2023 Phone (617) 918-1305 Fax (617) 918-1291 lombard.chris@epa.gov
EPA Region 2 Larry D'Andrea	NJ, NY, PR, VI	290 Broadway, 18th Floor, New York, NY 10007 Phone (212) 637-4314 Fax (212) 637-4360 dandrea.larry@epa.gov
EPA Region 3 Jeff Barnett	DE, DC, MD, PA, VA, WV	1650 Arch Street (3HS34), Philadelphia, PA 19103-2029 Phone (215) 814-3246 Fax (215) 814-5518 barnett.jeff@epa.gov
EPA Region 4 Kathleen Curry	AL, FL, GA, KY, MS, NC, SC, TN	Atlanta Federal Center, 61 Forsyth Street (SNFC, EPA Mail Rm.) Atlanta, GA 30303 Phone (404) 562-8660 Fax (404) 562-8628 curry.kathleen@epa.gov
EPA Region 5 Linda Morgan	IL, IN, MI, MN, OH, WI	77 West Jackson Boulevard (SE-4J), Chicago, IL 60604-3507 Phone (312) 886-4747 Fax (312) 886- 6741 morgan.linda@epa.gov
EPA Region 6 Camisha Scott	AR, LA, NM, OK, TX	1445 Ross Avenue, Suite 1200 (6SF-PB), Dallas, TX 75202-2733 Phone (214) 665-6752 Fax (214) 665-6660 scott.camisha@epa.gov
EPA Region 7 Nancy Schelle	IA, KS, MO, NE	901 N. 5th Street (SUPR/STAR), Kansas City, KS 66101 Phone (913) 551-7940 Fax (913) 551-8688 schelle.nancy@epa.gov
EPA Region 8 Dan Heffernan	CO, MT, ND, SD, UT, WY	999 18th Street, Suite 300 (EPR-B), Denver, CO 80202-2466 Phone (303) 312-7074 Fax (303) 312-6067 heffernan.dan@epa.gov
EPA Region 9 Bobbie Kahan Wallace Woo	AZ, CA, HI, NV, AS, GU	75 Hawthorne Street (SFD 1-1), San Francisco, CA 94105 Phone (415) 972-3143, (415) 972-3270 Fax (415) 947-3528 kahan.bobbie@epa.gov, woo.wallace@epa.gov
EPA Region 10 Laura Caparroso	AK, ID, OR, WA	1200 Sixth Avenue (ECL-112), Seattle, WA 98101 Phone (206) 553-6378 Fax (206) 553-0124 caparroso.laura@epa.gov
EPA Headquarters Myra Blakely		U.S. Postal Service mailing address: 1200 Pennsylvania Avenue, NW (MC 5105-T) Washington, DC 20005 Overnight Delivery mailing address: EPA West Building, 1301 Constitution Avenue, Room 2402 Washington, DC 20004 Phone (202) 566-2777 Fax (202) 566-2757 blakely.myra@epa.gov



## **Prohibitions on Use of Funds**

The Brownfields Law prohibits the use of any "part of a grant or loan" awarded under section 104(k) of CERCLA for:

- 1. A penalty or fine.
- 2. A federal cost-share requirement (for example, a cost share required by other federal funds).
- 3. A response cost at a brownfield site for which the recipient of the grant or loan is potentially liable under CERCLA section 107.
- 4. A cost of compliance with any federal law, excluding the cost of compliance with laws applicable to the cleanup.
- 5. The payment of an administrative cost.

In implementing the administrative cost prohibition, EPA has made a distinction between prohibited administrative costs and eligible programmatic costs.

A. Administrative Costs. Prohibited administrative costs are direct costs including those in the form of salaries, benefits, contractual costs, supplies, and data processing charges incurred to comply with most provisions of the "Uniform Administrative Requirements for Grants" contained in 40 C.F.R. Part 30 or 40 C.F.R. Part 31. Direct costs for grant administration are ineligible even if the grantee or subgrantee is required to carry out the activity under the grant agreement. Prohibited administrative costs are also *all indirect costs* under OMB Circulars A-21 (Educational Institutions), A-87 (Governments), and A-122 (Nonprofit Organizations), and Subpart 31.2 (Commercial Organizations) of the Federal Acquisition Regulation.

Ineligible grant administration costs include expenses for:

- Preparation of applications for Brownfields grants and sub-grants,
- Record retention required under 40 CFR 30.53 and 40 CFR 31.42,
- Record-keeping associated with supplies and equipment purchases required under 40 CFR 30.33, 30.34, and 30.35 and 40 CFR 31.32 and 31.33,
- Preparing revisions and changes in the budgets, scopes of work, program plans and other activities required under 40 CFR 30.25 and 40 CFR 31.30,
- Maintaining and operating financial management systems required under 40 CFR 30.20 and 40 CFR 31.20,
- Preparing payment requests and handling payments under 40 CFR 30.22 and 40 CFR 31.21,
- Nonfederal audits required under 40 CFR 30.26, 40 CFR 31.26, and OMB Circular A-133, and,
- Close out under 40 CFR 30.71 and 40 CFR 31.50.
- B. Programmatic Costs. EPA has determined that the administrative cost prohibition does not apply to "programmatic" costs, i.e., costs for activities that are integral to achieving the purpose of the grant, even if the Agency considered the costs to be "administrative" under the prior Brownfields Program.

- 1. The prohibition does not apply to direct costs of training. For example, costs for instructors' salaries, program management salaries (to the extent that such costs are included in the scope of work for the brownfields job training grant), training materials (e.g. textbooks, equipment, and classroom supplies), necessary travel and transportation expenses and, medical tests required to qualify for hazardous substances related work are programmatic, not administrative.
- 2. Direct costs, as defined in the applicable OMB Cost Principle Circular, for the following programmatic activities are not subject to the administrative cost prohibition. These costs, however, must be allowable under the scope of work for the grant. Costs incurred for complying with procurement provisions of 40 CFR Part 30 and Part 31 are considered eligible programmatic costs only if the procurement contract is for services or products that are direct costs for training as described above. Costs for performance and financial reporting required under 40 CFR 30.51 and 30.52, and 40 CFR 31.40 and 31.41 are eligible programmatic costs. Performance and financial reporting are essential programmatic tools for both the recipient and EPA to ensure that grants are carried out in accordance with statutory and regulatory requirements.
- 3. If your organization intends to provide noncompetitive subgrants to other nonprofit or governmental organizations, discuss the process you will follow to ensure that these agreements meet the standards for financial assistance contained in OMB Circular A-133, Section\_\_\_210.

For further information on these prohibitions, call your Regional Brownfields Contact listed in Appendix 1.