FAQ as a result of teleconference on 1/30/2018 for RFP Announcement - USDA-NRCS-CTA-EQIP-MO-18-01 for Conservation Technical Assistance and Environmental Quality Incentives Program Grant Funding for Fiscal Year 2018 – Missouri

Question: What is an average range of the amounts people may request? Is \$70,000.00 to high since only \$200,000.00 is available? What if you are requesting a multi-year proposal, because maybe you want to request \$20,000.00 for the next three years, which would be \$60,00.00, do you request the total of the multiple years? **Answer:** Applications may range anywhere from \$1000 to \$200,000 whether for single or multi-year projects. If you wish to apply for multi-year agreements, identify how much is needed for each year and we could evaluate that accordingly. All awards are dependent on funds availability. We use annual year funds, meaning we could enter an agreement using the current year funds for the 1st year, then at end of 1st year, we would reevaluate the agreement to determine if funding is needed/requested for the remaining years. This is a good example of a detail that needs to be examined in your budget narrative.

Question: To kind of follow that first question, in the case of a multiple year application the funding for the 1st year would be from the current pool, would the funding for the 2nd and perhaps the 3rd year would be contingent upon additional funding or would the award include the funding for 2nd and 3rd years, the initial award? **Answer:** In most cases the 2nd and 3rd years would depend on funding availability. But you would not have to reapply.

Question: Regarding the priority listing, do we just list one priority, or if we have multiple activities to put into one proposal should we select multiple priorities? **Answer:** You can select multiple priorities if you feel it overlaps. It is best if you fit into one priority. If a project touches multiple categories, identify those as well.

Question: What about those pull up displays for advertising, like where you have NRCS ones. What about one for our FOSA (Field Office Service Area)? Would that qualify? **Answer:** You would have to identify what it is going to say. If it conveys education points and it's at different workshops, then I think that is something we outreach and would consider. If that is a key part of the projects, to display information, you could submit that with a proposal. It really goes back to what information it contains.

Question: The overheads take a big chunk of funds from our projects. Is overhead an eligible expense at all? Is there a way for NRCS to have some kind of agreement which supports being limits this to no more than 10%? That would give us more funds to work with in the grants.

Answer: We do have some ceilings in there. I want to go back to the actual term overhead. There is administrative cost, and then there is indirect cost. These are what are allowable. When we talk about overhead, especially when a question is coming from a Soil and Water Conservation District, we have to be careful about that. That is paid by NRCS already. We need to clarify indirect and administrative to allow to

administer these opportunities, that is allowable a set rate that is in the program authorization.

(Additional comment by Caller) By overhead I was referring to salary and benefits pack, mailing permits, and that kind of thing. We don't have rent, utilities that kind of thing, but we do have salaries for staff time, benefits, taxes tied into that. And then things like bulk mail permits through USPS and postage, those kinds of things that might actually be related to those activities. (NRCS Answers) That is a very good example. Salary is for staff administrating this, and that is allowable. You would have to work with your funding agency, such as DNR if you were going to request for staff time they are already funding you for. Mailings to advertise a workshop, things like that are allowable. If you are talking about administrative time to administer the agreement, we do have the allowable 10% of the direct cost, since that wouldn't necessarily be a direct cost, it would be more like an indirect cost. It would be more tied to one specific deliverable. If that make since to you, then we do have the allowable 10% rate.

Question: It was stated that consultant employees that work as consultants that would not qualify, but to expand that a little bit would this grant cover cost if we had someone from the national watershed coalition come in to help with training, that could educate or promote public awareness or outreach workshops. Bringing in someone in that would educate or train water and soil conservation districts. Is it possible that their night stay could be covered as a cost in this?

Answer: Yes, thanks for the question. That would be a good example of a generally eligible expense. Certainly, speaker fees and expertise to provide training and awareness on a specific subject matter is generally allowed. Before incurring a huge expense, you would want to visit with us to confirm. I think the provisions I specifically mentioned regarding consultation involved a federal employee. An expert on the subject matter not related to a federal position, generally that would be an eligible expense.

Follow-up comments -

- The Code of Federal Regulations (CFR) Title 2 Part 200 defines and outlines guidance for administering agreements: <u>https://www.ecfr.gov/cgi-bin/text-</u> idx?SID=c14eb47e717b0bf213384210452b05b1&mc=true&tpl=/ecfrbrowse/Title 02/2cfr200_main_02.tpl
- Cost principles: budgets will be reviewed to verify if costs requested are reasonable, allowable, allocable, and necessary for the project requested. More information on what may be allowed can be found in <u>2 CFR 200 Subpart E</u>.

 Indirect costs: Cooperative agreements that may be awarded under this agreement are limited to 10% indirect cost rate, regardless of any other agreement.

Grants that may be awarded under this agreement may utilize a negotiated indirect cost rate agreement (NICRA) if applicants have one. If an application does not have one, a minimum rate of 10% may be applied and shown in budget forms and the budget narrative. Further description of this topic is within the funding opportunity announcement.

Both cooperative agreements and grants "transfer anything of value from the Federal awarding agency or pass-through entity to the non-Federal entity to carry out a public purpose."

A cooperative agreement "is distinguished from a grant in that it provides for substantial involvement between the Federal awarding agency or pass-through entity and the non-Federal entity in carrying out the activity contemplated by the Federal award."

"Substantial involvement" refers to the degree to which federal employees are directly performing or implementing parts of the award program. In a grant, the federal government more strictly maintains an oversight and monitoring role. In a cooperative agreement, then, federal employees participate more closely in performing the program.

Cooperative agreement means a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity that, consistent with 31 U.S.C. 6302-6305:

- a) Is used to enter into a relationship the principal purpose of which is to transfer anything of value from the Federal awarding agency or pass-through entity to the non-Federal entity to carry out a public purpose authorized by a law of the United States (see 31 U.S.C. 6101(3)); and not to acquire property or services for the Federal Government or pass-through entity's direct benefit or use;
- b) Is distinguished from a grant in that it provides for substantial involvement between the Federal awarding agency or pass-through entity and the non-Federal entity in carrying out the activity contemplated by the Federal award.
- c) The term does not include:
 - 1) A cooperative research and development agreement as defined in 15 U.S.C. 3710a; or
 - 2) An agreement that provides only:
 - i. Direct United States Government cash assistance to an individual;
 - ii. A subsidy;
 - iii. A loan;
 - iv. A loan guarantee; or
 - v. Insurance.

Grant agreement means a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity that, consistent with 31 U.S.C. 6302, 6304:

- a) Is used to enter into a relationship the principal purpose of which is to transfer anything of value from the Federal awarding agency or pass-through entity to the non-Federal entity to carry out a public purpose authorized by a law of the United States (see 31 U.S.C. 6101(3)); and not to acquire property or services for the Federal awarding agency or pass-through entity's direct benefit or use;
- b) Is distinguished from a cooperative agreement in that it does not provide for substantial involvement between the Federal awarding agency or passthrough entity and the non-Federal entity in carrying out the activity contemplated by the Federal award.
- c) Does not include an agreement that provides only:
 - 1) Direct United States Government cash assistance to an individual;

- 2) A subsidy;
- 3) A loan;
- 4) A loan guarantee; or
- 5) Insurance.

Here is a reference to the CFR regarding direct costs: <u>https://www.ecfr.gov/cgi-bin/text-</u>

idx?SID=a9e1688b82b903f09dfe7777b832e147&mc=true&node=se2.1.200_141 3&rgn=div8

Here is a reference to the CFR regarding indirect costs: <u>https://www.ecfr.gov/cgi-bin/text-</u>

idx?SID=a9e1688b82b903f09dfe7777b832e147&mc=true&node=se2.1.200_141 4&rgn=div8

- It was determined shortly after the Announcement USDA-NRCS-CTA-EQIP-MO-18-01 for Conservation Technical Assistance and Environmental Quality Incentives Program Grant Funding for Fiscal Year 2018 – Missouri was released that certification forms <u>SF LL Disclosure of Lobbying Activities</u> and the <u>AD-3030</u> are not required in the submittal package.
- As a reminder, all applications must be submitted to NRCS by 4:00 pm CST, February 23, 2018.
- Have additional questions? Call 573-876-0901 or email Karen Brinkman (<u>karen.brinkman@mo.usda.gov</u>) or Debbie Burgess (<u>Deborah.burgess@mo.usda.gov</u>).