

# Budget Changes and Amendments for Brownfield Cooperative Agreements

EPA Region 10

Brownfields and Land Revitalization Program

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Tribal Brownfields Grant Management Training

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# Cooperative Agreement (CA)

*A legal instrument EPA uses to transfer money, property, services, or anything of value to a recipient to accomplish a public purpose in which substantial EPA involvement is anticipated during the performance of the project.*

***Think Partnership!***

The Federal Grant and Cooperative Agreement Act of 1977





# Key Words & Definitions



**Allocation** - The process of assigning a cost, or a group of costs, to one or more cost objective(s), in reasonable proportion to the benefit provided or other equitable relationship. The process may entail assigning a cost(s) directly to a final cost objective or through one or more intermediate cost objectives (Source: 2 CFR 200.1)

**Obligations** - When used in connection with a non-federal entity's use of funds under a federal award, refers to orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-federal entity during the same or a future period. (Source: 2 CFR 200.1)

**Unobligated balances/Unliquidated Obligations** - The total federal funds authorized under a grant minus the grant expenditures and any **unliquidated obligations**, which are obligations incurred, but not yet paid (including amounts due to subrecipients and contractors). (Source: SF 425 FFR)

**Expenditures** - Amount of money spent under the grant, including payments to subrecipients and contractors. (Source: 2 CFR 200.1)

**[2 CFR Part 200.1 - Definitions](#)**



**Your workplan  
is a “living”  
document.**

**Changes will  
happen!**







**Communication is KEY!**

# Typical Types of Amendments in Brownfield Grants

- No Cost Extensions (requires justification)
- Scope Change
- Incremental Funding
- Supplemental Funding
- Major Rebudgeting



# Requesting a Budget Change

Depending on the complexity of changes to a grant agreement, different steps may be required for the grant to comply with federal and EPA regulations.

Some types of changes require the prior approval of an authorized EPA official before they can be implemented, while other changes can be implemented without EPA's approval but still require you to notify EPA.

## [2 CFR Part 200.407 Prior Approval](#)

Authorized EPA officials for approvals required by regulation are Grants Management Officers or Award Officials. If changes to an award agreement are significant, a formal amendment may be necessary.



To learn more:

## [EPA Grants Management Training for Applicants and Recipients](#)

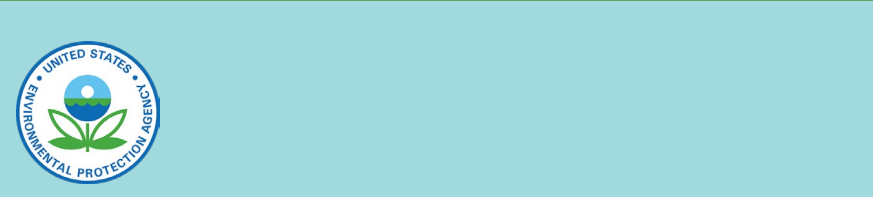






# Start with an Email to your EPA Project Officer/Project Manager (PO/PM)

- Provide an email with a description of your proposed changes and justification for the changes
- If a change in your budget is required, briefly outline those proposed changes
- We may set up a Teams meeting to discuss changes and next steps

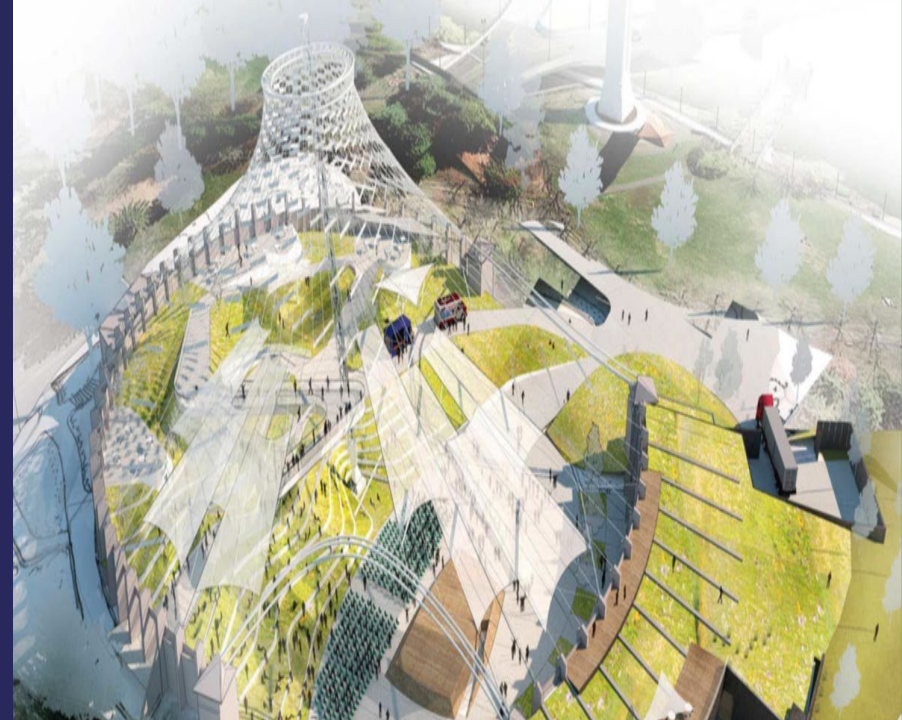
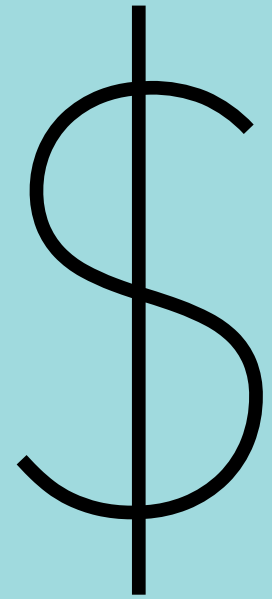




Costs must be allowable, reasonable, necessary, allocable, and eligible.

Costs must be incurred within the Cooperative Agreement period of performance.

For federal awards, costs must meet specific criteria to be charged to an award: allowable (not restricted by federal grant regulations), they must be reasonable (a prudent person's standard), they must be necessary (essential for the proper and efficient performance or administration of the [federal award](#)), allocable (benefit the award), and eligible (authorized under grant program's authorizing statute). These criteria, detailed in [2 CFR Part 200 Subpart E — Cost Principles](#), ensure that funds are used appropriately and consistently with the terms of the award and federal regulations. Costs must also be consistent in their treatment across different projects and must be adequately documented.



## **Additional Documentation may be required!**

Depending on the significance of the change, your EPA Project Officer will either approve the change via email and/or will ask for additional documentation/information like an updated workplan, SF-424a, etc.





# Example Scenario



Your program has been selected to present on your STRP at the Environmental Stewards Summit in Juneau, Alaska.

- This travel cost was not previously budgeted for, but you do have funding in your travel budget category for a different conference.
- You decide that the conference in Juneau better meets your workplan objectives. Costs are slightly higher for the Juneau conference but there is available funding in other budget categories.

**What should you do next?**

Send  
an  
Email  
To Your  
Project  
Officer

-OR-

Talk  
With  
Your  
Project  
Officer



Send

From

sanders-curry.madison@epa.gov

To

EPA

Cc

Bcc

Subject

Requesting Work Plan Change RP-123456789

I am writing to request a change to our work plan for our Cooperative Agreement RP-123456789.

Back in December we had submitted an abstract to present at the Environmental Stewards Summit in Juneau . We were selected to present on the topic of “Brownfields and Land Revitalization in Communities.” Attending this conference was not originally approved in our work plan and we would like to propose that we go to this conference instead of the Seattle conference that is currently in our work plan.

While we mostly have the funds to cover it, we will be adjusting some of the money out of Supplies and Other to cover the costs (see table below). We believe this conference to be an exciting opportunity to broaden our reach and tell the story of our program as well as support Element 3. In addition, other federal entities will be there so we will be able to learn more about resources available to us to support [our](#) brownfields work. Let me know if you need anything else!

Cost Category	Current Approved Budget	Proposed Budget Modification (+/-)	New Budget	Notes
Personnel	\$55,000		\$55,000	
Fringe (30%)	\$16,500		\$23,520	
Travel	\$1,000	+1,000	\$2,000	Adding travel for Juneau conference
Equipment	\$0		\$0	
Supplies	\$1,000	-500	\$500	Will not purchase office supplies, and outreach materials cost less <a href="#">then</a> budgeted for
Contractual	\$0		\$0	
Other	\$1,500	-500	\$1,000	No longer need conference fees
Total Direct Charges	\$75,000		\$75,000	
Indirect Charges Rate: (20%)	\$15,000		\$15,000	
TOTALS (\$)	\$90,000		TOTAL: \$90,000	





# Example Budget Change Table

Cost Category	Current Approved Budget	Proposed Budget Modification (+/-)	New Budget	Explanations of Changes
Personnel	\$80,000	-\$5,600	\$78,400	Staff hired at lower rate than workplan
Fringe (30%)	\$25,200	-\$1,680	\$23,520	Staff hired at lower rate than workplan
Travel	\$10,000	-\$7,455	\$2,545	Did not attend a conference
Equipment	\$0		\$0	
Supplies	\$800	-\$500	\$300	Supplies were less costly than anticipated
Contractual	\$78,000	+\$23,000	\$101,000	Additional funding needed for assessment
Other	\$2,500	-\$1,625	\$875	Did not attend a conference that had a registration fee
Total Direct Charges	\$122,500		\$105,640	
Indirect Charges Rate: (20%)	\$24,500	-\$6,140	\$18,360	IDC rate was reduced
<b>TOTALS (\$)</b>	\$225,000	\$0	\$225,000	



# Example of When a Cooperative Agreement Amendment is Needed

Your program has a need to purchase a piece of Equipment to meet workplan objectives. However, the equipment is not detailed in your current approved workplan and budget.





# Example of when a workplan change may not be necessary

The workplan had an activity that included presenting in a classroom in February. Due to scheduling challenges and a late winter storm, the presentation was changed to May.

This change will not impact the other grant activities.

This is NOT a change in scope, but the change SHOULD be documented in the next progress report.





If your changes are approved:

- ✓ Document the change in your next Progress Report.
- ✓ Add all the documentation related to the change to your grant file.

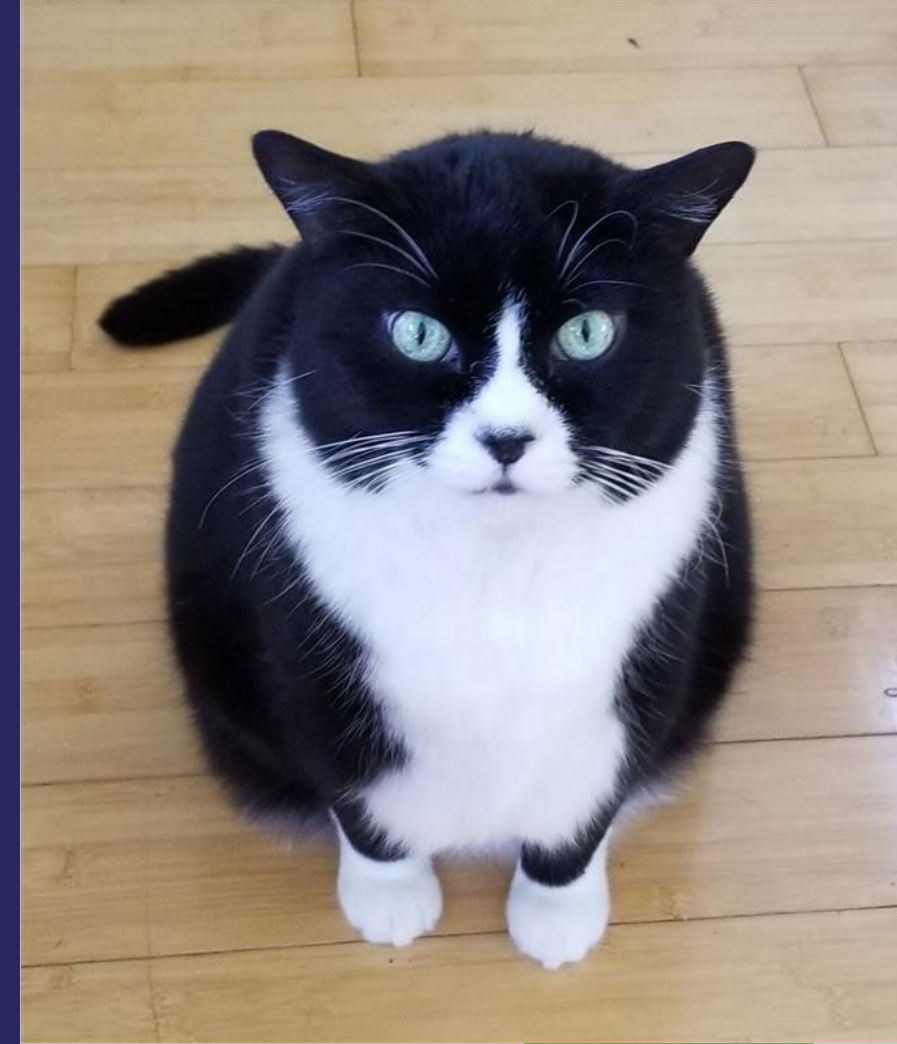
# Other Potential Changes

## Changes to personnel listed on the Key Contacts Form

- As changes to personnel occur, make sure that all contacts listed on the Key Contacts Form (EPA Form 5700-54) are up to date.
- Have changes? → Fill out a new form and submit it to your EPA Project Officer (PO) via email
- EPA Grantee Forms - <https://www.epa.gov/grants/epa-grantee-forms>

## Changes to your indirect cost (IDC) rate

- Indirect costs rates expire, and your administration may have a new rate negotiated. Make sure EPA has your most up to date indirect cost rate agreement on file.
- ***Have a new IDC Rate?*** Send a copy of the new IDC Rate Agreement via email to your EPA PO and EPA Grants Specialist (GS)





**Q: Which of the following should you contact your EPA Project Officer about for prior approval?**

- A) Adding a trip to a Regional Conference
- B) Procuring a different model of drone that is similar in price and features as to the one in your workplan
- C) Purchasing software to process drone data that wasn't included in your approved workplan
- D) Swapping travel for site specific work that isn't in the approved workplan
- E) All of the above
- F) A, C, & D



**Q: True or False: Workplans should never be changed.**

**A: FALSE!**

Workplans are living documents that have the ability to change! Communicating changes with your EPA Project Officer is key to ensuring that all costs are allowable, reasonable, allocable, and eligible. Your EPA Project Officer will let you if any additional documentation is needed and if an amendment is required.



# Resources

- [EPA Grants](#)
- [EPA Grants Webinars](#)
- [EPA Grants Management Training Modules for Applicants and Recipients](#)
- [EPA Grants – Regulations, Policy, and Guidance](#)
- [Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#)
- [How to Develop a Budget](#)
- [EPA Guidance on Participant Support Costs](#)
- [EPA Guidance on Participant Support Costs - RAIN-2018-G05-R2](#)
- [Procurement, Subawards, and Participant Support Costs Training - June 27, 2023](#)
- [Office of Grants and Debarment \(OGD\) Guidance on Selected Items of Cost for Recipients](#)
- [EPA Grant General Terms & Conditions](#)
- [2 CFR Part 200 Uniform Grant Guidance \(UGG\)](#)
- [2 CFR Part 200.1 – Definitions](#)
- [2 CFR Part 1500](#)





# Key Takeaways

- Make sure you are always working from your current approved workplan
- Document, document, document
- Communicate early and often
- Ask for permission and not forgiveness



# Contact Info

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For other EPA Region 10 Contacts, visit our website:

<https://www.epa.gov/brownfields/epa-region-10-contact-list>

