



## Brownfields Resources: Administrative Tips for EPA Brownfield Grant Recipients

Congratulations on receiving an EPA Brownfield cooperative agreement. Cleaning up and redeveloping brownfield sites is essential if we are going to preserve our neighborhoods, slow urban sprawl and stop the continuing development of green space.

You may initially feel overwhelmed by the number of requirements in managing your cooperative agreement. The information in this document is intended to provide tips to make it easier. While every effort has been made to provide accurate and helpful information in this document, recipients should always defer to their EPA Project Officer (PO) or Grant Specialist for questions or clarifications.

### MONEY MATTERS

As your organization incurs eligible costs, you'll need to draw down funds from your brownfield grant. Drawdowns should be done in a timely manner as brownfield costs outlined in your approved EPA workplan are incurred. Prompt drawdown of grant funds not only helps you pay your grant expenses in a timely manner, but it also ensures that EPA has a better idea of the amount of funding remaining on your grant. Timely drawdowns also ensure obligated federal funds are not sitting around giving the appearance they are not needed. At minimum, you should draw down funds at least once each quarter, if expenses are incurred.

There are two methods of drawing down funds: Automated Standard Application for Payment (ASAP) or Electronic Funds Transfer (EFT). ASAP is the mandatory method of payment for EPA grantees. Unless a waiver has been approved by EPA, all recipients must be enrolled in ASAP to receive payment.

#### **Automated Standard Application for Payment (ASAP):**

Organizations with multiple grants and those with a frequent need to request funds will find the ASAP system quick and easy to use. The ASAP system allows recipients to receive funds without delay. Recipients who use multiple bank accounts for their grant must use the ASAP system. To enroll in ASAP, complete the [ASAP Initiate Enrollment Form](#) and email it to [rtpfc-grants@epa.gov](mailto:rtpfc-grants@epa.gov). Once enrolled, grantees can access ASAP at [www.asap.gov](http://www.asap.gov) to request payments. The ASAP payment process is designed to provide federal funds to a recipient organization within 48 hours. Once the ASAP account is established, your organization can initiate an electronic payment online via the ASAP system when a drawdown of grant funds is necessary.

**Electronic Funds Transfer (EFT):** Under this system, funding is deposited directly into your bank account. Please note that for EPA cooperative agreements and grants, you will need a waiver to use the EFT method of reimbursement.

### REPORTING

A number of reporting requirements exist for a brownfield cooperative agreement recipient (CAR). While this is not a comprehensive list of all reporting requirements, the following will provide you with assistance for some of the key requirements. Establishing a "tickler" file soon after the grant award can be a valuable tool in reminding you when reports are due. Your tickler file should include the website location and blank copies of any reporting forms. Having a handy copy of the reporting forms reminds you what information you need to collect as you go along and will make preparing your reports and forms quicker and easier.

**Progress Reports:** These periodic reports, typically provided on a quarterly basis, outline progress on your grant activities. Reporting frequency and specific information that must be included in your reports will be defined in your programmatic terms and conditions (T&Cs). Read the T&Cs carefully and be sure you understand your grant's reporting requirements and deadlines. In general, progress reports include the following information.

- **Activities conducted** during the reporting period such as work progress and status, difficulties encountered and how you resolved them, preliminary data results and anticipated activities planned for the subsequent reporting period.
- **A comparison of actual accomplishments to anticipated outputs/outcomes** listed in your approved workplan. Include an explanation for why goals, objectives, schedule, milestones or measures aren't being met and other pertinent information; for example, include a description and explanation of cost overruns or high unit costs.
- If you have a brownfield assessment, revolving loan fund or cleanup grant, **site-specific work** such as a list of properties where assessment or cleanup activities have started or been completed.
- **Any changes in key personnel.**
- **Costs and expenses incurred and the financial status for each task** and how these compare to costs projected in the approved workplan for the activities. This information should take the form of a budget recap summary table with the current approved project budget, cost incurred during the reporting period, cumulative costs, and total remaining funds. Include an explanation of any discrepancies in the budget from the approved workplan. The progress report should differentiate which activities were completed with EPA brownfield grant funds versus other funding sources.
- **If you make subawards, report on activities relevant to the subrecipients** by summarizing the results of any financial and programmatic reviews of the subrecipient, findings of site visits, environmental results achieved, and audit findings and corrective actions of any deficiencies.

Maintain records that will enable you to report to EPA the amount of funds expended on activities, including the amount used for specific properties.

Progress reports are due within 30 days after the end of the reporting period. It is important to keep track of information that needs to be reported so it can be included in the required progress reports. Keeping a running record of all key activities will make it easier to submit progress reports on time. You can avoid having to reconstruct what happened months later or having to look up important dates and other reporting information.

**Assessment, Cleanup and Redevelopment Exchange System (ACRES):** Brownfield grantees must complete the Property Profile form electronically via ACRES for each site assessed and/or cleaned up with EPA Brownfield funding. Information must be entered into ACRES as soon as the interim action or final accomplishment has occurred, or at the time the next quarterly report is submitted.

Participating in an ACRES training program provided by EPA is a good way to ensure proper data entry. Another tool available to assist with ACRES reporting is the Brownfields Inventory Tool (BIT) supported by the KSU Technical Assistance to Brownfields (TAB) Program. BIT provides an interface with ACRES to facilitate the entry of site-specific information and reduce the need to enter information into each system. Information on BIT can be found at [www.ksutab.org](http://www.ksutab.org).

**Central Contractor Registration (CCR)/System for Award Management (SAM):** As a brownfield grantee, you must keep your CCR/SAM information up to date throughout your grant. You will need to review and update the information at least annually, and more frequently if changes are needed. Make sure your organization's designee keeps their system password updated so you are not locked out and unable to make necessary reports or update your organization's information. This will be especially important if you plan to apply for a new federal grant.

**Reporting Subawards and Executive Compensation:** Your organization will need to report on each action that obligates \$25,000 or more in federal funds for a subaward under the grant. This information must be reported via [www.fsr.gov](http://www.fsr.gov) no later than the end of the month following the month in which the obligation is made. For example, if the obligation is made in November, it must be reported no later than December 31 of the same year.

You may also need to report compensation of the five most highly compensated executives of your organization and all first-tier subrecipients. Check with your Grant Specialist or cooperative agreement PO for more information regarding this requirement. If you do need to report this information, incorporating this reporting requirement in your subaward agreements will facilitate later reporting.



**Federal Financial Reporting (FFR):** Brownfield grantees are required to submit an FFR (SF-425) at least annually and at the end of the grant. The form should be submitted no later than 90 days after the end of the cooperative agreement performance period. Please email the completed report to EPA's Research Triangle Park Finance Center at [rtpfc-grants@epa.gov](mailto:rtpfc-grants@epa.gov). This form must be submitted as a final form to financially close out your EPA cooperative agreement. No expenses may be incurred on your agreement after the specified budget period end date. If an extension of time is necessary, please notify your EPA PO.

**Minority/Women's Business Enterprise Utilization Report (MBE/WBE):** If the combined total of your grant funds budgeted for procuring supplies, equipment, construction or services exceeds \$150,000, you must complete EPA Form 5700-52A.

In determining whether your grant exceeds the \$150,000 threshold, focus on funds budgeted for procurement under the supplies, equipment, construction, services or "other" categories, and include funds budgeted for procurement under subawards or loans. Reporting is also required in cases where the details of the budgets of subawards/loans are not clear at the time of the grant award and the combined total of the procurement and subawards and/or loans exceeds the \$150,000 threshold.

If you have multiple brownfield grants, you must submit a separate MBE/WBE form for each grant. There is no penalty for having low or no MBE/WBE utilization. The percentages in the terms and conditions of your cooperative agreement are goals, not quotas. Just make your best effort to reach out and include MBE/WBE organizations in procurement activities and be sure to document these efforts. MBE, WBE and Disadvantaged Business Enterprise (DBE) contractors and vendors are listed with U.S. Department of Commerce at [www.mbda.gov](http://www.mbda.gov), the U.S. Small Business Administration at [www.sba.gov](http://www.sba.gov), and the U.S. EPA Small Business Vendor Profile System at [vpmdsweb.epa.gov/](http://vpmdsweb.epa.gov/).

The MBE/WBE form is available at [www.epa.gov/financial/forms](http://www.epa.gov/financial/forms). Submit the MBE/WBE form to the person/office designated in the MBE/WBE term and condition of your grant. Typically, this is someone in the Regional Grants Office.

Frequency of required reporting is grant-specific and will be outlined in your grant T&Cs. Read the T&Cs carefully for requirements and deadlines. Generally, if your organization's grant was awarded on or after May 27, 2008, you will be required to report twice per year, by April 30 and October 30. All other grantees report annually.

## ADDITIONAL RESOURCES

If you need additional assistance regarding administration of your brownfield grant, please contact your EPA PO. Staff will provide the help you need or guide you to other sources of assistance.

Check out more Fact Sheets on our website.

