

CONNECT News

Community Support, Networking, and Assistance for Environmental Career Training

November 2016

The Hazardous Materials Training and Research Institute (HMTRI) provides technical assistance to communities interested in developing and delivering environmental job training programs. HMTRI also provides technical support to Environmental Workforce Development and Job Training (EWDJT) grantees funded by the Environmental Protection Agency (EPA). These efforts are made possible with a cooperative agreement with the U.S. EPA.

HMTRI is part of Eastern Iowa Community Colleges and has provided environmental workforce development technical assistance since the inception of EPA's Brownfields Initiative.

In this issue of *CONNECT News*, we will review EPA rules governing the administration of partners, subgrantees, and contractors.

ADMINISTRATIVE AND LEGAL CONSIDERATIONS OF WORKING WITH PARTNERS

In general terms, all stakeholders are partners. Most Environmental Workforce Development and Job Training (EWDJT) grantees have their own internal tracking and accounting rules for subgrantees, nonfinancial partners, and contractors. With regards to the U.S. Environmental Protection Agency (EPA), minimum administrative and regulatory requirements must be considered whenever money is transferred using grant funds. For administrative discussion, partners can be categorized as follows.

- Subgrantees
- Nonfinancial partners
- Contractors and consultants

SUBGRANTEES

When money (from grant funds) changes hands, administrative rules begin to apply. The first category, subgrantees, are extensions of

the EWDJT program—primarily other nonprofits or governmental organizations. They must comply with every EPA federal regulation for which the EWDJT grantee is responsible. They are subject to audits, allowable and nonallowable costs, and contracting procedures as indicated in the *Federal Register*. As primary grantee, the EWDJT program is held responsible for compliance of subgrantees.

Subgrantees may be selected without a competitive process as long as they are identified in the grant proposal, budget, and approved work plan. Change of subgrantees requires approval from EPA. Contracts and consultants are not usually considered subgrantees, while a community college or governmental organization may be a subgrantee or a contractor.

NONFINANCIAL PARTNERS

Any group or organization that is not compensated for their efforts or contributions can be categorized as a nonfinancial partner.

These leveraging partners are a necessary component to the success and sustainability of EWDJT programs. Contributions may include in-kind labor and training, equipment, facilities, operating funds, or instructional materials—basically, anything provided to the program at no cost to the grant.

Examples of nonfinancial partners include several types of organizations.

- Workforce Investment Boards
- City or state government
- Housing authorities
- Foundations and individuals
- Private sector enterprise and consultants working without fee
- Educational institutions
- Faith-based and nongovernmental organizations

Partner contributions are important and should be recognized, identified in the grant proposal, and reported as leveraged resources. There are no regulatory or administrative responsibilities associated with leveraged contributions. Leveraged resources and partners may come into the program at any time. The EPA regional coordinator should be informed when major leverage partners written in the proposal change.

Seeking leveraged resources is an important component for program sustainability and can be incorporated as part of the community and labor market assessments. Finding new leveraging partners should be an ongoing activity, and is most effective when program staff make the effort to network and connect with former contacts.

CONTRACTORS AND CONSULTANTS

A contract partner is any organization (not including subgrantees) that is paid with EPA grant funds for goods or services. Official and

detailed information can be found on [EPA's website](#).

In simple terms, when money (from grant funds) changes hands, potential contractors, consultants, or service providers must undergo a competitive review. EPA will not generally allow sole source procurement contracts for professional services or goods that are available in the commercial marketplace.

Contractors may represent a variety of organizational structures. The key distinction is that they are providing a service or goods for a fee. While not subject to subgrantee regulations, they do need to comply with federal procurement guidelines.

EWDJT grantees are required to purchase goods and services in accordance with the minimum EPA requirements even if their own procurement system has less stringent standards. Some organizations may have more stringent procurement requirements than required by EPA.

Since obtaining competitive bids and administering the procurement process take time to implement, it is important to plan for and start the requisition process early, preferably during the program planning stage, so that it can be written into the grant proposal.

At a minimum, the procurement process must include a public competition with at least three participating bidders. The award does not need to go to the lowest bidder, but justification needs to be recorded supporting the final award.

It is not necessary that the procurement process wait for the EWDJT grant award. In fact, it is helpful to have the training contractor or consultant on board such that they can be written into the grant proposal. This is a simple process. The request for proposal should include a statement that the award is contingent on receiving EPA funding and an

approval of the budget and work plan. Requests for proposals can be conducted electronically, via website, or in print. It is important that winning contractors deliver services in accordance with EPA procurement requirements in addition to meeting the proposed training schedule.

ENVIRONMENTAL WORKFORCE DEVELOPMENT PROFESSIONAL LEARNING COMMUNITY (PLC)

The objective of the PLC is to promote and share innovative strategies among Brownfields job training communities, and to provide technical assistance to new communities interested in developing job training programs. The PLC is open to everyone.

PLC sessions from November through January will concentrate on the aspects of building a sustainable environmental job training program and tips for writing a grant proposal in response to the upcoming release of the FY2017 EWDJT Request for Proposals. PLC sessions are scheduled for:

- November 30, 2016
- December 14, 2016
- January 4, 2017
- January 18, 2017

To join in the session, call 712.432.0850 approximately five minutes before the session starts at 2:00 p.m. ET. The access code is 550105 followed by #.

HMTRI TECHNICAL ASSISTANCE

Technical assistance services for EWDJT grantees and prospective grantees provided by HMTRI include:

- Annual Environmental Job Development All-Grantee Meeting
- Annual Environmental Job Development All-Grantee Update Webinar
- Grantee and Community Outreach Listserv
- Environmental Workforce Development Professional Learning Community (PLC)
- MentorLink Program
- Grantee Scans
- Individualized Technical Assistance

FOR MORE INFORMATION

For more information on HMTRI technical assistance services or to be added to our Grantee and Community Outreach Listserv, please contact Glo Hanne at ghanne@eicc.edu.

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