TSCA Section 404(g) Lead-Based Paint Programs

State, Territory, District of Columbia, Tribal and Federal Grant Guidance for FY19

October 2018

TSCA Section 404(g) Grants - Purpose and Scope

The U.S. Environmental Protection Agency (EPA) is making available non-matching financial assistance (grants) to States, Territories, the District of Columbia, and eligible Indian Tribes and Intertribal Consortia under the authority of section 404(g) of the Toxic Substances Control Act (TSCA) (15 U.S.C. 2684(g)). Lead-based paint program grants are awarded 1) to develop and/or carry out an authorized lead based paint activities program; 2) to develop and/or carry out an authorized lead pre-renovation education program; and 3) to develop and/or carry out an authorized renovation, repair and painting program. Collectively these programs are referred to as lead-based paint programs.

Since 1994, EPA has been offering financial assistance under TSCA section 404(g) to States, Territories, and the District of Columbia (hereafter referred to as "States") and to Indian Tribes and Intertribal Consortia (hereafter referred to as "Tribes"). EPA encourages States and Tribes to seek authorization of their own lead-based paint programs. EPA's goal is to have authorized programs in all States and on those Indian Tribal lands where such a program is warranted.

The grants must be used to develop and implement authorized programs. To receive this funding, a State or Tribe must be making substantial progress toward an authorized program. Therefore, the EPA Regional Offices, as part of its grant oversight responsibilities, will work with the grantees to determine the appropriate amount of funding based upon the amount of developmental work to be completed as the grantee makes progress toward authorization.

EPA's Office of Enforcement and Compliance Assistance provides grants to fund compliance assurance and enforcement activities in authorized lead-based paint programs. These funds must be used in a way that compliments funds awarded under this grant program.

This guidance describes the purposes of this grant program and EPA's authority for issuing them; explains what entities are eligible to apply for grants; outlines what activities can be funded; explains how the funds will be awarded and distributed, including the criteria EPA will consider when evaluating grant proposals; discusses grant application submission requirements; and summarizes grant reporting requirements. Proposals that qualify for funding will be funded according to the procedures outlined in the "Award of Funds" and "Distribution of Funds" sections of this guidance document.

Background and Authority

On October 28, 1992, the U.S. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of Public Law 102-550). Title X amended TSCA by adding Title IV--Lead Exposure Reduction (15 U.S.C. 2681 et seq.). The purpose of Title X was to develop a national strategy and to build an infrastructure to eliminate lead-based paint hazards in all housing.

Congress passed Title X based on findings that: 1) low-level lead poisoning is widespread among American children, affecting as many as three million children under the age of six, with minority and low-income communities being disproportionately affected; 2) low levels of lead poisoning in children cause intelligence quotient deficiencies, reading and learning disabilities, impaired hearing, reduced attention span, hyperactivity, and behavior problems; 3) pre-1980

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American housing stock contains more than three million tons of lead in the form of lead-based paint; and 4) the ingestion of household dust containing lead from deteriorating or abraded lead-based paint is the most common cause of lead poisoning in children.

Section 402(a) of TSCA authorizes EPA to promulgate regulations governing lead-based paint activities to ensure that individuals engaged in such activities are properly trained, that the training programs are accredited, and that contractors engaged in such activities are certified. EPA promulgated these regulations at 40 CFR part 745, subpart L.

Section 402(c) of TSCA authorizes EPA to promulgate regulations governing renovation activities conducted in homes built before 1978 that produce a lead-based paint hazard. EPA promulgated these regulations at 40 CFR part 745, subpart E. This regulation also amended provisions under 40 CFR Subpart Q to allow for the authorization of State, Tribal or Territorial Renovation, Repair and Painting (RRP) programs.

Section 406(b) of TSCA authorizes EPA to promulgate regulations to require each person who performs for compensation renovation and remodeling of target housing to provide a lead hazard information pamphlet to the owner and occupant of such housing prior to commencing the renovation. EPA promulgated the regulations called for by section 406(b) (Lead Pre- Renovation Education Rule) at 40 CFR Part 745, subpart E.

Under TSCA section 404, EPA may authorize any State to administer and enforce the standards, regulations, or other requirements established under TSCA sections 402 and/or 406(b) if the State has a program that is at least as protective of human health and the environment as the program specified in TSCA sections 402 and/or 406(b), and that provides adequate enforcement. EPA's implementing regulations at 40 CFR part 745, subpart Q, extends EPA's ability to authorize lead-based paint programs to Indian Tribes. This extension to Indian Tribes is consistent with the general principles of Federal Indian law and the Agency's Indian policy, which states that Tribal governments will implement environmental programs in Indian country to the maximum extent possible.

EPA administers the TSCA lead-based paint grant program under the authority of section 404(g) of TSCA. Regulations governing these grants are found at 2 CFR 200 and 2 CFR 1500 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Assistance). Regulations which supplement the EPA general assistance regulations found in 2 CFR 200 and 2 CFR 1500 are found at 40 CFR part 35, subpart A, and subpart B. Contained within 40 CFR part 35 are specific subsections which govern grants for the lead-based paint program under section 404(g); 40 CFR 35.270 through 35.272 (applicable to States, Territories, and the District of Columbia), and 40 CFR 35.690 through 35.693 (applicable to Indian Tribes and Intertribal Consortia). This grant program is listed in the Catalog of Federal Domestic Assistance (CFDA) under program number 66.707 TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals.

The EPA Regional Offices administer these grants pursuant to a delegation of authority that permits the 10 EPA Regional Administrators to enter into grants with eligible States and Tribes[1].

[1] http://intranet.epa.gov/ohr/rmpolicy/ads/dm/12-29.htm

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This national guidance document is directed primarily to EPA's Regional Offices to facilitate and support Regional administration of this program. Regional Offices will work closely with the States and Tribes to develop programs that reflect both EPA and State and Tribal program priorities.

Section 404(h) of TSCA requires EPA to implement and enforce a federal lead based paint program in all States and Tribal areas that do not have a program authorized by EPA under 40 CFR part 745, subpart Q. Although EPA's goal is to authorize as many State and Tribal programs as possible, the Agency and Congress anticipated that there would be a number of States and Tribes that would not seek program authorization. EPA is authorized to use section 404(g) funds to implement a federal lead-based paint program for non-authorized States and Tribes. See 40 CFR 35.116, and 40 CFR 35.516.

Eligibility

States and Tribes are eligible to apply for financial assistance under this program. To be eligible for funding under this grant a Tribe must meet the criteria in 40 CFR 35.693(a).

A State or Tribal applicant may receive assistance if it is either implementing an EPA authorized lead-based paint program pursuant to 40 CFR Part 745, subpart Q, or if it is developing a lead-based paint program that will be authorized in the future. The EPA Regional Offices, as part of their grant oversight responsibilities, will have discretion with respect to determining whether a given State or Tribe is making sufficient progress toward the development and implementation of a program under TSCA Title IV. Failure to make satisfactory progress toward program authorization will result in a State or Tribe receiving no funding.

Where the Agency has direct implementation responsibilities, EPA cannot provide financial assistance under this grant program to non-authorized States or Tribes to assist the Agency in implementing and enforcing a Federal program under TSCA section 404(h).

Eligible parties may use this grant support in a way that complements and does not duplicate activities for which they already receive or could receive financial assistance from other federal sources (e.g., Centers for Disease Control and Prevention (CDC) and U.S. Department of Housing and Urban Development (HUD)).

States and Tribes may choose to combine funds from this grant program with other environmental program grants as part of a Performance Partnership Grant (PPG). States must adhere to the requirements for PPGs in 40 CFR 35.130 through 35.138. Tribes must adhere to the requirements for PPGs in 40 CFR 35.530 through 35.538.

Activities to Be Funded

This section describes in detail eligible activities that may be funded under this program. Required elements of authorized lead-based paint programs are specified in 40 CFR 745.323 through 745.327. Although the list below is not exhaustive, funding under this grant can be used for the following purposes

Develop required elements of authorized lead-based paint programs:

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- Develop and/or enact enabling legislation.
- Adopt implementing regulations.
- Develop and/or revise, as needed, work practice standards for the conduct of lead-based paint activities and for the conduct of renovation, repair, and painting.
- Develop and/or adopt lead hazard standards and clearance standards for lead in soil, dust, and paint.
- Develop and/or revise, as needed, lead-based paint programs, including regulations or procedures for decertification, suspension, revocation or modification of approvals and certificates.
- Develop and/or revise, as needed, requirements for the administration of a third-party certification exam.

Implement the program:

- Maintain, improve and/or develop the appropriate infrastructure to successfully administer and enforce a program to ensure that individuals engaged in lead-based paint activities and/or renovation, repair and painting activities regulated by a grantee's lead-based paint renovation, repair, and painting program are properly trained, that training programs are accredited, and that contractors and firms engaged in such activities are certified.
- Foster activities that would increase the efficiency of a grantees program to ensure that individuals engaged in lead-based paint activities and/or renovation, repair and painting activities regulated by a grantee's program are properly trained; that training programs are accredited; and that contractors engaged in such activities are certified. These activities could include initiatives to develop local capacity in low-income and rural areas, to promote increased competition in the regulated community through agreements which permit entities recognized by an outside jurisdiction to operate in the grantee's jurisdiction (referred to as "reciprocity"), and similar efforts.
- Foster activities that increase public demand for certified firms and individuals and accredited training providers. These activities could include the provision of outreach and education to the regulated community or the public, as long as the outreach/education activities are designed to increase the number of certified firms, trained individuals and accredited training providers.
- Adjust or enhance the appropriate infrastructure to accommodate additional program responsibilities.
- Maintain, improve and/or develop a system to document certification of inspectors, risk assessors, supervisors, workers, project designers, renovators, and dust sampling technicians.

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- Maintain, improve and/or develop the appropriate infrastructure to successfully administer and enforce a program to ensure that renovation contractors provide lead-hazard information to building owners and residents.

- Oversee the conduct of certified individuals engaged in lead-based paint activities to ensure that they are conducting their activities in accordance with all applicable regulations, including monitoring inspection, risk assessment, and abatement activities per the authorized program.

- Oversee the conduct of certified renovators engaged in regulated renovation, repair and painting activities to ensure that they are conducting their activities according to all applicable regulations per the authorized program.

- Oversee accredited training programs per the authorized program.

Report on grant performance:

- Prepare a report per 40 CFR 745.327(d) and/or 2 CFR 200 and 2 CFR 1500 grant reporting requirements on the grantees program progress and performance.

Grant Activities that are not authorized[2]

Section 404(g) of TSCA does not authorize grant funds awarded under this program to be used for the following activities:

- Activities or programs that provide general lead awareness outreach and education to the public, including

    - The development of materials,
    - The printing and distribution of materials,
    - Purchasing radio, TV or other mass media advertising.

- GIS mapping and other technology to identify neighborhoods with high incidences of children with elevated blood lead levels.

- The performance of risk assessments, inspections or lead-based paint abatements.

- The training of renovators, dust sampling technicians, risk assessors, inspectors, project designers, abatement supervisors or abatement workers.

- Enforcement activities including field inspections and case development. (EPA's Office of Enforcement and Compliance Assurance provides grants to fund compliance assurance and enforcement activities in authorized lead-based paint programs.)

[2] Based on Guidance from OGC on the Use of State and Tribal Assistance Grant Funds under TSCA Sections 10, 28 and 404(g).

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- Funding staff to perform functions other than those allowed, as listed in the section of this guidance entitled "Activities to be Funded."

Program Income

Under TSCA, authorized lead-based paint training and certification programs are required to collect fees to cover certain costs incurred by the program. These fees are considered "program income," which is defined as "gross income received by a grantee or subgrantee directly generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period." See 2 CFR 200 and 2 CFR 1500. It includes income from fees for services performed by the recipient. Program income generated by activities supported under TSCA section 404(g) grants may include fees that a State or Tribe charges for training, accreditation, certification, licensing or other services performed by the lead based paint program, as well as fees that are collected which provide for enforcement of standards and regulations. Consequently, States and Tribes must comply with the rules governing "program income," found at 2 CFR 200.307 and 2 CFR 1500.7. Specifically, recipients are authorized to add program income to the funds committed to the grant agreement. According to 2 CFR 200.307(e)(2), this program income must be used for the purposes and under the conditions of the grant agreement. Note that according to 2 CFR 200.307(e), a designation must be made in the grant agreement that the addition method is being applied to program income.

Funds Available

EPA currently expects that $14,049,000 in FY2019 appropriated STAG funds will be available to support EPA's Lead Program. EPA expects that up to $11,214,000 in FY2019 appropriated funds will be available for financial assistance under TSCA section 404(g) for awards to States for the development and implementation of EPA-authorized lead-based paint activities (402(a)) programs, Renovation Repair and Painting Programs (402(c)), and Pre-Renovation Education Programs (406((b)). Of that amount, the Agency is reserving up to $100,000 to provide funding to a State, Tribe or Territory that receives authorization for an RRP program by February 17, 2019. Any funds not used for this purpose will be allocated for other purposes within the lead program. The Agency expects that up to $100,000 in FY2019 appropriated funds will be available for financial assistance under TSCA section 404(g) for awards to Tribes for development and implementation of EPA-authorized lead based programs.

In addition to these appropriated funds, EPA's Office of Enforcement and Compliance Assurance provides grants to fund compliance assurance and enforcement activities in authorized lead-based paint programs. These funds must be used in way that compliments funds awarded under TSCA Section 404(g).

The FY2019 deadline for commitment of funds is June 30, 2019, and for obligation of funds is September 1, 2019. Carryover of FY2019 funds into FY2020 will not be allowed. Funds not committed or obligated by a Region by these deadlines will be reprogrammed to EPA HQ and allocated for other purposes within the lead program. In addition, all STAG funds returned from grantees during FY2019, including returned STAG designated as E1D would be reprogrammed back to EPA HQ at that time and allocated for other purposes within the lead program.

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Funding for EPA Authorized Lead Programs

Financial assistance to Tribes

Each Tribe that submits a qualifying proposal and is making sufficient progress toward the development and/or implementation of an acceptable lead-based paint program, as determined by the EPA Regional Offices, may receive base funding of up to $50,000. Though Tribes without an authorized program may submit qualifying proposals, the award of funds will be based upon the applicant's progress in developing an acceptable program, including implementing regulations and seeking program authorization from EPA. Failure to make satisfactory progress toward program authorization will result in the Tribe receiving no funding. Tribes can only be eligible for program development funding for 3 years after their first grant. If a Tribe is unable to receive program authorization within that period, it will be considered ineligible for further grant funding until it receives program authorization. Further distribution of the Tribal set-aside funds will be dependent upon the number of applicants, the progress that the grantee is making in developing a program, the status of expenditures of previously awarded funds, population, and the relative strength of the proposal.

After the closing date for submittal of Tribal applications specified in this guidance, EPA Headquarters and Regional Offices will consider each of the proposals and make decisions about the level of funding to be awarded to each of the applicants. Following those decisions, EPA Headquarters will transfer the funds to the Regional Offices for award to the Tribes. Tribal set-aside funds are not included in the formula funds pool for States as discussed below. Requests for Tribal grant funds under TSCA section 404(g) must be submitted to HQ by February 17, 2019. If these funds remain unrequested by that date, HQ will redirect the funds to other lead program priorities.

Financial Assistance to States

The process used by EPA for determining award-funding levels for States involves two steps. In Step 1, EPA Headquarters determines, based on the factors discussed below, the funding level that will be made available to each of the EPA Regional Offices for grants. Following distribution of the funds to the EPA Regional Offices, in Step 2, the Regional Offices make decisions on the actual funding level for each of the grantees.

A two-tiered system to determine the amount of grant funds that will be distributed to the EPA Regional Offices will be used in FY2019. This system provides a base funding level for each authorized program while providing funds targeted to States with the largest program workload and with the greatest potential lead burden.

The base funding set-aside provides a base level of funds for every State. Each State that has an authorized lead-based paint abatement program receives a base funding allotment of $50,000. Each State that has an authorized Renovation, Repair and Painting program receives a base funding allotment of $75,000. Each State that has an authorized Pre-Renovation Education program, but not an RRP program, receives a base funding allotment of $50,000. Any State that submits a qualifying proposal and is making sufficient progress toward implementation of an acceptable program may receive a $50,000 base. In order to remain eligible for grant funding, the

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State must have a final application package for program authorization to the Agency three years after the State's enabling legislation is signed into law.

In calculating the lead burden for the formula rankings, EPA uses readily available data derived from the 2013 Census and the 2001 National Survey of Lead and Allergens in Housing prepared by the U.S. Department of Housing and Urban Development (HUD). The formula uses four factors to generate an estimate of the potential lead problem, or "lead burden," in each state. Two of these factors, the number of housing units built before 1980 and the number of children under age five, express the potential magnitude of the lead problem. The remaining two factors, the percentage of children under five in poverty and the number of low-income housing units with lead-based paint, express the potential severity of the problem.

In calculating the estimated workload of each grantee, the Agency collects data from each grantees' lead-based paint abatement program. This data includes the number of active certifications (individual and firm), and active accreditations issued by the grantee.

In determining formula rankings, each State is scored independently for each factor. The four lead burden factors and the two workload-estimated factors for each State are then summed to obtain two score totals -- lead burden and workload. These are then weighted -- 30% for lead burden and 70% for workload -- and summed for that applicant to produce a combined factor score. The combined factor scores of all applicants for formula funds are summed, and the percentage of the total sum represented by that score is then identified. The grantees formula allotment is determined by multiplying the total formula funding by the percentage score. In addition to the funds described above, the Agency is expecting to make available grants to any State, Tribe or Territory that receives authorization for an RRP program by February 17, 2019. The Agency has set aside up to $100,000 to fund these grants. The final award amount will be dependent on the number of new authorized programs, the financial needs of the applicant and the availability of funds. If these funds remain unrequested by that date, HQ will redirect the funds to other lead program priorities.

Agency Direct Implementation

In FY2019, the program plans to use approximately $2,835,000 for direct implementation of the abatement and RRP programs in all non-authorized States, Tribes and Territories. $1,615,000 will be distributed to the Regions based on a formula with sixty percent of the funds being distributed evenly across all Regions as base funding. In FY2019, the formula uses the percentage of certified renovation firms, the number of training providers that are eligible for reaccreditation in FY2019 and the lead burden number for each Region. The Regions will primarily use these funds to hire support staff to assist in the accreditation of RRP and abatement training providers and in Regions 2 and 9 for the certification of abatement professionals. Regions 2 and 9 process certifications of abatement professionals for all Regions and will receive additional funding to support these activities.

$1,220,000 will be used to support the certification of RRP and abatement professionals as well as the accreditation of training providers. The bulk of these funds will provide contract support for the entire lead program. These funds will cover:

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- Working Capital Fund costs for the Regions, HQ and contractors;
- CDX maintenance and enhancement (electronic submission of abatement applications and training provider notifications and RRP firm applications);
- The National Lead Information Center only for the purpose of answering questions regarding Lead-based activities and RRP certification and accreditation;
- FLPP database operations, maintenance and redesign;
- Processing and data entry for all RRP and abatement applications;
- Processing and data entry of all training provider accreditation applications; and
- Processing and data entry of all pre and post training notifications for both abatement and RRP training.

Section 404(g) of TSCA does not authorize Direct Implementation funds be used for the following activities.

- Activities or programs providing general lead awareness outreach and education to the public, including
    - The development of materials,
    - The printing and distribution of materials,
    - Purchasing radio, TV or other mass media advertising.
- GIS mapping and other technology to identify neighborhoods with high incidences of children with elevated blood lead levels.
- The performance of risk assessments, inspections or lead-based paint abatements.
- The training of renovators, risk assessors, inspectors, abatement supervisors, abatement workers or dust testing technicians.
- Funding staff to perform functions other than those listed above as allowable activities.

Submission Requirements

40 CFR part 35, subpart A and subpart B describes in detail the submission requirements for grant applications. For section 404(g) funding for Tribes, EPA is soliciting pre-application grant proposals prior to the submittal of the forms and certifications listed in this unit. This pre-application procedure entails the applicants initially submitting only a work plan and a budget. The Agency will use the applicants' work plans and budgets to select programs to be funded under this grant program.

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EPA will conduct a review of all submitted applications and required documents, including but not limited to the "Application for Federal Assistance" form (Standard Form 424), and the "Budget Information: Non-Construction Programs" form (Standard Form 424A). The required forms can be found at https://www.epa.gov/grants/epa-grantee-forms. All applications must be submitted by an official representative of your institution via the grants.gov website.

- The grantee should go to Grants.Gov and click on "APPLICANTS" on the top of the page and then click on "Apply for Grants" from the dropdown menu and then, click on 'APPLY" and follow the instructions accordingly.

- Please note to apply through Grants.gov you must use Adobe Reader software and download the compatible Adobe Reader version. For more information about Adobe Reader, to verify compatibly, or to download the free software please visit Adobe Reader Compatibility Information on Grants.gov.

- The grantee may also access the application package for this announcement by searching for the opportunity on Grants.gov. Go to grants.gov and then click on "Search for Grants" at the top of the page, under Basic Search Criteria in the CFDA box, enter the CFDA number and click on the search button.

- The Catalog of Federal Domestic Assistance (CFDA) number is 66.707 "TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals Grant. The grantee should select the "PACKAGE TAB" and click on "select package" for 66.707.

In addition, as part of the pre-application, Tribes must include all appropriate information to demonstrate that they meet the criteria at 40 CFR 35.693 for treatment as a State. In order for Intertribal Consortia to be eligible for financial assistance under section 404(g), they must include all appropriate information to demonstrate that they meet the requirements at 40 CFR 35.504 concerning eligibility.

Where a single State agency has been designated as responsible for coordinating lead activities, EPA encourages that agency to apply for funding under TSCA section 404(g). Coordination of federally funded lead activities by a single agency is viewed as conducive to achieving integration of lead activities. Early consultations are recommended between prospective applicants and their EPA Regional Offices. Because TSCA grants will be administered at the Regional level, these consultations can be critical to the success of a project or program, and can also contribute substantially to efficient program operations. As part of the work plan, EPA Regional Offices may ask for additional information that will be useful in evaluating the program such as the status of enabling legislation, a detailed line-item budget with sufficient information to clearly justify costs, a list of work products or deliverables, a schedule for their completion and application for program authorization under TSCA, and a description of any financial assistance received from other federal sources concerning the lead program. Applicants must also include all appropriate information on program income in accordance with 2 CFR 1500.7 and 2 CFR 200.307.

Work plans are to be negotiated between applicants and their Regional Offices to ensure that both EPA and State or Tribal priorities are addressed. Any application from a State or Tribe that

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is not making sufficient progress toward implementation of an acceptable program will not be funded.

Reporting

Pursuant to 2 CFR 200.307, grantees shall submit quarterly performance reports to the appropriate EPA Regional Office. The Office of Management and Budget (OMB) under OMB Control Number 2030-0020 (General Administrative Requirement for Assistance Programs) approved these requirements. The specific information contained within the report should include:

- a comparison of actual accomplishments to the objectives established for the period;
- the number of lead-based paint activities individual and firm certifications issued in the reporting period;
- the number of valid certified lead-based paint activities individuals and firms, by discipline;
- the number of RRP firm certifications issued in the reporting period;
- the number of valid RRP firm certifications;
- the number of accredited of lead-based paint activities training courses by discipline;
- the number of RRP training provider accreditations issued in the reporting period.

Cost Principles for State, Local, and Indian Tribal Governments

Grantees should note that 2 CFR 225 - Cost Principles for State, Local, And Indian Tribal Governments (OMB Circular A-87) is applicable to these grants and they should pay particular attention to Appendix B, Section 8.h.- Selected Items of Cost[3] regarding compensation for personal services.

Support of salaries and wages.

These standards regarding time distribution are in addition to the standards for payroll documentation.

(1) Charges to Federal awards for salaries and wages, whether treated as direct or indirect costs, will be based on payrolls documented in accordance with generally accepted practice of the governmental unit and approved by a responsible official(s) of the governmental unit.

[3] https://www.gpo.gov/fdsys/pkg/CFR-2012-title2-vol1/pdf/CFR-2012-title2-vol1-part225-appB.pdf

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(2) No further documentation is required for the salaries and wages of employees who work in a single indirect cost activity.

(3) Where employees are expected to work solely on a single Federal award or cost objective, charges for their salaries and wages will be supported by periodic certifications that the employees worked solely on that program for the period covered by the certification. These certifications will be prepared at least semiannually and will be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

(4) Where employees work on multiple activities or cost objectives, a distribution of their salaries or wages will be supported by personnel activity reports or equivalent documentation which meets the standards in subsection 8.h.(5) of this appendix unless a statistical sampling system (see subsection 8.h.(6) of this appendix) or other substitute system has been approved by the cognizant Federal agency. Such documentary support will be required where employees work on:

(a) More than one Federal award,

(b) A Federal award and a non-Federal award,

(c) An indirect cost activity and a direct cost activity,

(d) Two or more indirect activities which are allocated using different allocation bases, or

(e) An unallowable activity and a direct or indirect cost activity.

(5) Personnel activity reports or equivalent documentation must meet the following standards:

(a) They must reflect an after the fact distribution of the actual activity of each employee,

(b) They must account for the total activity for which each employee is compensated,

(c) They must be prepared at least monthly and must coincide with one or more pay periods, and

(d) They must be signed by the employee.

(e) Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to Federal awards but may be used for interim accounting purposes, provided that:

(i) The governmental unit's system for establishing the estimates produces reasonable approximations of the activity actually performed;

(ii) At least quarterly, comparisons of actual costs to budgeted distributions based on the monthly activity reports are made. Costs charged to Federal awards to reflect adjustments made as a result of the activity actually performed may be recorded annually if the quarterly comparisons show the differences between budgeted and actual costs are less than ten percent; and

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(iii) The budget estimates or other distribution percentages are revised at least quarterly, if necessary, to reflect changed circumstances.

STAG Distribution		
	FY19	**FY18**
Target	$14,049,000*	$13,728,000**
Program		
Regional DI	$1,390,000	$1,390,000
Regional Centers of Excellence	$225,000	$225,000
	$1,615,000	$1,615,000
HQ DI	$1,220,000	$1,144,000***
Agency Direct Implementation	$2,835,000	$2,759,000
Grants for Authorized Tribes	$100,000	$100,000
State Grants - Abate, RRP & 406(b)	$11,014,000	$10,769,000
State Grants - FY18 RRP Apps.	$100,000	$100,000
Sec 404(g) State/Tribal Support	$11,214,000	$10,969,000
Total	$14,049,000	$13,728,000

* FY19 funding is based on the enacted budget of FY18.
** FY18 funding is the FY18 enacted amount of $14,049K minus a $321K rescission.
** FY18 HQ DI request was originally $1,220K. The value show represents HQ funding following the budget rescission.

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FY19 STAG Funds - Regional Distribution				
Reg.	**Formula**	**DI**	**Tribes**	**Total Auth.**
1	$1,225,416	$126,638		$1,352,054
2	$558,396	$299,250		$857,646
3	$1,499,383	$153,810		$1,653,193
4	$1,903,510	$174,456		$2,077,966
5	$1,945,310	$182,856		$2,128,166
6	$973,248	$131,136		$1,104,384
7	$1,179,727	$110,173		$1,289,901
8	$634,681	$110,941		$745,621
9	$549,592	$217,542		$767,135
10	$544,736	$108,198		$652,934
Totals	$11,014,000	$1,615,000		$12,629,000

Regional Direct Implementation

		1	2	3	4	5	6	7	8	9	10		
RRP Trainers - Reaccredit.	Trainers due for Re Accredit. in	29	33	41	34	46	11	7	12	36	13	262	Updated 9/25/18
Percentage	FY18	11.1%	12.6%	15.6%	13.0%	17.6%	4.2%	2.7%	4.6%	13.7%	5.0%		
RRP Certified Firms	Includes EPA Cert. firms in	4,606	11,590	9,352	6,262	14,700	3,581	2,134	1,931	9,148	1,395	64,699	Updated 9/13/18
Percentage	Authorized States	7.1%	17.9%	14.5%	9.7%	22.7%	5.5%	3.3%	3.0%	14.1%	2.2%		
	Combined Percentages	9.1%	15.3%	15.1%	11.3%	20.1%	4.9%	3.0%	3.8%	13.9%	3.6%	100%	
Percent of Lead Burden		6.5%	8.4%	10.3%	21.4%	15.6%	12.3%	6.6%	6.1%	7.3%	5.4%	100%	
	Combined Percentages	7.8%	11.8%	12.7%	16.4%	17.9%	8.6%	4.8%	5.0%	10.6%	4.5%	100%	$1,615,000
40%	Formula Funding	$43,238	$65,850	$70,410	$91,056	$99,456	$47,736	$26,773	$27,541	$59,142	$24,798	$556,000	
60%	Base Funding	$83,400	$83,400	$83,400	$83,400	$83,400	$83,400	$83,400	$83,400	$83,400	$83,400	$834,000	
	Total DI Funds	$126,638	$149,250	$153,810	$174,456	$182,856	$131,136	$110,173	$110,941	$142,542	$108,198		
	Centers of Excellence		$150,000							$75,000		$225,000	
		$126,638	**$299,250**	**$153,810**	**$174,456**	**$182,856**	**$131,136**	**$110,173**	**$110,941**	**$217,542**	**$108,198**	**$1,615,000**	

Region	State	Formula Allocation
1	Connecticut	$212,426
1	Maine	$175,759
1	Massachusetts	$323,297
1	New Hampshire	$150,649
1	Rhode Island	$258,463
1	Vermont	$104,821
2	New Jersey	$294,610
2	New York	$0
2	Puerto Rico	$263,786
3	Delaware	$228,319
3	DC	$171,775
3	Maryland	$271,075
3	Pennsylvania	$325,125
3	Virginia	$315,646
3	West Virginia	$187,443
4	Alabama	$340,385
4	Florida	$0
4	Georgia	$361,325
4	Kentucky	$286,978
4	Mississippi	$270,442
4	North Carolina	$355,340
4	South Carolina	$0
4	Tennessee	$289,039
5	Illinois	$342,937
5	Indiana	$285,306
5	Michigan	$390,709
5	Minnesota	$259,710
5	Ohio	$344,441
5	Wisconsin	$322,207
6	Arkansas	$168,517
6	Louisiana	$240,569
6	New Mexico	$0
6	Oklahoma	$270,418
6	Texas	$293,743
7	Iowa	$323,997
7	Kansas	$314,837
7	Missouri	$323,087
7	Nebraska	$217,806
8	Colorado	$241,248
8	Montana	$0
8	North Dakota	$138,822
8	South Dakota	$0
8	Utah	$254,611
8	Wyoming	$0
9	Arizona	$0
9	California	$360,120
9	Hawaii	$189,472
9	Nevada	$0
10	Alaska	$0
10	Idaho	$0
10	Oregon	$232,247
10	Washington	$312,489
		$11,014,000

1	$1,225,416
2	$558,396
3	$1,499,383
4	$1,903,510
5	$1,945,310
6	$973,248
7	$1,179,727
8	$634,681
9	$549,592
10	$544,736

Region	State	Number of Pre-1978 Housing Units	Under 5 years (2013 Census)	% of Families below poverty w/ children under 5 (2013 Census)	Number of Low-Income Housing Units with LBP	Decile Rank Lead Burden				Lead Burden Score	# of Cert.	Accr. Training Course	Rank Workload		Workload Score	Percent of Total $	Formula Award	402 Auth	RRP/406b Auth.	406b Only	Base Award	Total Award	
1	Connecticut	1,069,000	197,395	13	73,023	28	19	6	17	70	487	7	35	23	58	2.1%	$162,426	Y	N	N	$50,000	$212,426	1.93%
1	Maine	449,000	67,176	21	44,311	15	10	32	13	70	278	2	25	16	41	1.6%	$125,759	Y	N	N	$50,000	$175,759	1.60%
1	Massachusetts	2,091,000	366,296	13	164,435	42	33	5	33	113	501	13	35	29	64	2.5%	$198,297	Y	Y	N	$125,000	$323,297	2.94%
1	New Hampshire	348,000	68,116	12	24,904	11	11	3	6	31	176	4	20	19	39	1.3%	$100,649	Y	N	N	$50,000	$150,649	1.37%
1	Rhode Island	348,999	55,938	16	34,066	12	6	16	10	44	101	29	14	37	51	1.7%	$133,463	Y	Y	N	$125,000	$258,463	2.35%
1	Vermont	201,000	31,237	18	17,637	2	1	24	3	30	132	0	17	1	18	0.7%	$54,821	Y	N	N	$50,000	$104,821	0.95%
2	New Jersey	2,524,000	537,907	12	174,580	43	41	4	35	123	875	39	41	42	83	3.1%	$244,610	Y	N	N	$50,000	$294,610	2.67%
2	New York	6,489,000	1,164,577	17	629,147	50	49	21	49	169	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
2	Puerto Rico	852,000	214,254	52	314,016	21	22	51	44	138	309	28	29	36	65	2.7%	$213,786	Y	N	N	$50,000	$263,786	2.40%
3	DC	248,000	36,492	15	25,029	6	2	12	7	27	1016	22	44	32	76	2.3%	$178,319	Y	N	N	$50,000	$228,319	2.07%
3	Delaware	209,000	56,000	14	18,100	3	7	9	4	23	124	0	15	1	16	0.6%	$46,775	Y	y	N	$125,000	$171,775	1.56%
3	Maryland	1,401,000	366,354	11	111,181	32	34	1	24	91	2,555	17	50	30	80	2.8%	$221,075	Y	N	N	$50,000	$271,075	2.46%
3	Pennsylvania	4,127,000	722,978	17	367,748	48	46	19	47	160	842	71	40	48	88	3.5%	$275,125	Y	N	N	$50,000	$325,125	2.95%
3	Virginia	1,734,000	509,788	13	181,204	39	40	7	36	122	908	85	43	50	93	3.4%	$265,646	Y	N	N	$50,000	$315,646	2.87%
3	West Virginia	588,000	103,607	27	86,555	17	13	50	20	100	131	7	16	23	39	1.8%	$137,443	Y	N	N	$50,000	$187,443	1.70%
4	Alabama	1,161,000	301,925	25	186,526	30	28	45	38	141	206	43	21	44	65	2.8%	$215,385	Y	Y	N	$125,000	$340,385	3.09%
4	Florida	3,686,000	1,076,304	19	520,901	46	48	28	48	170	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
4	Georgia	1,626,000	677,378	21	252,267	36	44	35	41	156	366	36	30	41	71	3.0%	$236,325	Y	Y	N	$125,000	$361,325	3.28%
4	Kentucky	1,107,000	278,866	26	169,114	29	26	48	34	137	373	44	31	45	76	3.0%	$236,978	Y	N	N	$50,000	$286,978	2.61%
4	Mississippi	681,000	205,585	27	131,142	18	21	49	27	115	161	5	19	20	39	1.9%	$145,442	Y	Y	N	$125,000	$270,442	2.46%
4	North Carolina	1,858,000	623,707	22	265,694	41	43	38	43	165	302	30	28	38	66	2.9%	$230,340	Y	Y	N	$125,000	$355,340	3.23%
4	South Carolina	929,000	298,242	26	144,783	23	27	46	29	125	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
4	Tennessee	1,432,000	403,431	24	210,108	34	36	43	40	153	457	35	33	40	73	3.1%	$239,039	Y	N	N	$50,000	$289,039	2.62%
5	Illinois	3,763,000	820,771	17	315,543	47	47	18	45	157	1,791	82	48	49	97	3.7%	$292,937	Y	N	N	$50,000	$342,937	3.11%
5	Indiana	1,789,000	427,452	21	162,133	40	37	37	32	146	480	33	34	39	73	3.0%	$235,306	Y	N	N	$50,000	$285,306	2.59%
5	Michigan	3,128,000	585,258	24	262,580	44	42	41	42	169	1,642	48	47	46	93	3.7%	$290,709	Y	N	Y	$100,000	$390,709	3.55%
5	Minnesota	1,417,000	351,416	14	110,688	33	32	10	23	98	738	27	38	35	73	2.7%	$209,710	Y	N	N	$50,000	$259,710	2.36%
5	Ohio	3,655,000	706,439	23	329,971	45	45	40	46	176	1,543	60	46	47	93	3.8%	$294,441	Y	N	N	$50,000	$344,441	3.13%
5	Wisconsin	1,665,000	351,295	17	131,067	38	31	20	26	115	1,288	3	45	18	63	2.5%	$197,207	Y	Y	N	$125,000	$322,207	2.93%
6	Arkansas	697,000	195,357	26	113,475	19	18	47	25	109	52	2	12	16	28	1.5%	$118,517	Y	N	N	$50,000	$168,517	1.53%
6	Louisiana	1,223,000	312,075	25	198,945	31	29	44	39	143	279	11	26	27	53	2.4%	$190,569	y	N	N	$50,000	$240,569	2.18%
6	New Mexico	441,000	141,533	24	75,838	13	16	42	17	88	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
6	Oklahoma	1,022,000	264,159	23	138,266	27	25	39	28	119	236	1	23	15	38	1.9%	$145,418	Y	Y	N	$125,000	$270,418	2.46%
6	Texas	4,576,000	1,934,973	20	699,940	49	50	29	50	178	894	11	42	27	69	3.1%	$243,743	Y	N	N	$50,000	$293,743	2.67%
7	Iowa	968,000	197,610	18	80,995	25	19	23	19	86	811	22	39	32	71	2.5%	$198,997	Y	Y	N	$125,000	$323,997	2.94%
7	Kansas	805,000	202,761	19	76,717	20	20	27	18	85	558	18	36	31	67	2.4%	$189,837	Y	Y	N	$125,000	$314,837	2.86%
7	Missouri	1,657,000	383,011	21	182,503	37	35	31	37	140	2,203	42	49	43	92	3.5%	$273,087	Y	N	N	$50,000	$323,087	2.93%
7	Nebraska	542,000	130,465	18	49,097	16	15	26	15	72	279	25	26	34	60	2.1%	$167,806	Y	N	N	$50,000	$217,806	1.98%
8	Colorado	1,076,000	339,802	16	104,793	28	30	15	22	95	151	8	18	24	42	1.8%	$141,248	Y	N	Y	$100,000	$241,248	2.19%
8	Montana	279,000	61,040	21	36,137	7	9	35	11	62	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
8	North Dakota	209,000	45,275	15	23,377	3	4	13	5	25	73	6	13	22	35	1.1%	$88,822	Y	N	N	$50,000	$138,822	1.26%
8	South Dakota	232,000	58,935	18	26,142	5	8	25	8	46	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
8	Utah	441,000	259,342	13	46,679	13	24	6	14	57	207	8	22	24	46	1.7%	$129,611	Y	Y	N	$125,000	$254,611	2.31%
8	Wyoming	852,000	39,409	14	16,318	21	3	11	2	37	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
9	Arizona	999,000	446,556	20	156,549	26	39	30	31	126	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
9	California	8,448,000	2,527,752	16	959,875	51	51	16	51	169	6,741	96	51	51	102	4.0%	$310,120	Y	N	N	$50,000	$360,120	3.27%
9	Hawaii	294,000	89,223	12	28,429	8	12	2	9	31	599	5	37	20	57	1.8%	$139,472	Y	N	N	$50,000	$189,472	1.72%
9	Nevada	302,000	183,538	18	51,651	9	17	22	16	64	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
10	Alaska	132,000	54,362	14	13,924	1	5	8	1	15	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
10	Idaho	325,000	117,755	21	40,159	10	14	34	12	70	0	0	1	1	2	0.0%	$0	N	N	N	$0	$0	0.00%
10	Oregon	945,000	233,715	21	104,399	24	23	32	21	100	252	0	24	1	25	1.4%	$107,247	Y	Y	N	$125,000	$232,247	2.11%
10	Washington	1,510,000	441,534	16	155,037	35	38	14	30	117	433	10	32	26	58	2.4%	$187,489	Y	Y	N	$125,000	$312,489	2.84%
	Totals	78,550,999	20,266,366							5368	31,550	1035				100%	$7,814,000				$3,200,000	$11,014,000	100.00%

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