To: Carlin, Jayne[Carlin.Jayne@epa.gov]; 'Ivan Camacho'[ivan.camacho@state.or.us]; FOSTER Eugene P[eugene.p.foster@state.or.us]
Cc: Henning, Alan[Henning.Alan@epa.gov]
From: FOSTER Eugene P
Sent: Fri 10/7/2016 1:06:42 AM
Subject: RE: Question about 319 grants and match funding
image001.gif

Thank you for the information, that helps. And tell Cyd thank you from us.
cheers
Gene

From: Carlin, Jayne [Carlin.Jayne@epa.gov]
Sent: Thursday, October 06, 2016 5:51 PM
To: 'Ivan Camacho'; FOSTER Eugene P
Cc: Henning, Alan
Subject: Question about 319 grants and match funding

From: Curtis, Cynthia
Sent: Thursday, October 06, 2016 12:07 PM
To: Carlin, Jayne <Carlin.Jayne@epa.gov>
Subject: RE: Question about 319 grants and match funding

Jayne – sorry this was stuck in my draft box.
Jayne – see page 48 of the guidelines.
"The non-federal match does not need to be contributed at the time of the grant award, but the funds must be contributed as needed to meet the schedules established in the work plan milestones, and must occur during the project period of the grant award. EPA regions must verify that grantees have satisfied the match requirements upon review and submittal of the grantee's final federal financial report."

As part of workplan review there would be budget information included so there would be confidence that the match requirement would be met during the grant, but the precise evaluation occurs at the Grant closeout.

Let me know if this helps.
-Cyd

From: Carlin, Jayne
Sent: Wednesday, September 28, 2016 12:52 PM
To: Curtis, Cynthia <Curtis.Cynthia@epa.gov<mailto:Curtis.Cynthia@epa.gov>>
Subject: FW: Question about 319 grants and match funding

Hi Cyd,

Do you know the answer to Gene's question about timing for matches?

Does EPA require 40% match documentation at the time DEQ receives an invoice for reimbursement?

Or does EPA only require the states to document 40% match before the grant period ends for an individual pass through grant?

Or is it that EPA requires 40% match documentation at the time that 319 Grant from EPA is closed?

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Seattle, WA 98101-3140
(206) 553-8512
carlin.jayne@epa.gov<mailto:carlin.jayne@epa.gov>

From: FOSTER Eugene P [mailto:eugene.p.foster@state.or.us]
Sent: Wednesday, September 28, 2016 9:49 AM
To: Carlin, Jayne <Carlin.Jayne@epa.gov<mailto:Carlin.Jayne@epa.gov>>
Cc: FOSTER Eugene P <eugene.p.foster@state.or.us<mailto:eugene.p.foster@state.or.us>>; Henning, Alan <Henning.Alan@epa.gov<mailto:Henning.Alan@epa.gov>>; CAMACHO Ivan <ivan.camacho@state.or.us<mailto:ivan.camacho@state.or.us>>
Subject: RE: Question about 319 grants and match funding

Hi Jayne

Ex. 6 - Personal Privacy

I thought you might be able to answer my question about 319 pass through grants and EPA match requirements.

Does EPA require 40% match documentation at the time DEQ receives an invoice for reimbursement?

Or does EPA only require the states to document 40% match before the grant period ends for an individual pass through grant?

Or is it that EPA requires 40% match documentation at the time that 319 Grant from EPA is closed?

Let me know if you want to discuss or need additional clarification.

thanks
Gene

From: FOSTER Eugene P
Sent: Tuesday, September 27, 2016 2:17 PM
To: 'Henning, Alan'
Cc: CAMACHO Ivan; FOSTER Eugene P
Subject: RE: Question about 319 grants and match funding

Thanks Ivan

Hi Alan - the question is; does EPA require DEQ to have 40% match for each invoice prior to DEQ reimbursing the grantee. Many times our pass through grant recipients generate match after the work funded by the pass through grant but prior to the grant ending. If we are not able to reimburse until we have documented match, for many of our pass through grant recipients that would cause an undue hardship and likely they would not be able to apply and use 319 grant funds for their projects. These grant recipients do generate the match required, but it comes later in the project.

Let us know if you want to discuss.

thanks
Gene

From: CAMACHO Ivan
Sent: Tuesday, September 27, 2016 1:58 PM
To: 'Henning, Alan'
Cc: FOSTER Eugene P; BROWN Mark A
Subject: Question about 319 grants and match funding

Hello Alan,

I hope you are doing well.

Have a question for you to help us in streamlining our grant process as it refers to match funding.

Background

We are aware of the match requirements for all 319 grants. Our stakeholders are very aware of this requirement as well.

We have met the required match at every grant, documented in our records as we have closed every funding cycle. Our records indicate an excess of the required match for many years. This is a result of the diligent work that our 319 partners are able to leverage in funding.

Because of the nature of many of our partners combination of funding we realize at the initial review of the application for funding that the match for the project may not match the timing of the work-plan implementation schedule. I would be happy to provide information on past projects that have been successful because we did not require match and grant fund expenses to occur simultaneously.

The question for you is as follows

Should we require the correspondent match with every invoice that our stakeholders submit.

Justification

For all of our projects, we have a good understanding of where the match will come from and when it will be accrued when we review and recommend the applications for funding. When we write the grant agreements for a particular approved work-plan, we do so with an understanding of when and where the match will come from. We would not recommend the applications for funding if we did not feel that there is strong water quality benefit and good opportunity for success in the proposed project. We do not invest in risky projects.

Until recently we have not required the corresponding match with every invoice, but as it is referenced in the work-plan and of course at the project completion. We have language in our boilerplate detailing that we will retain 10% of the 319 grant amount until we have received and approved a final report including documenting of the required match. The language in our current boiler plate reads:

Match Matching funds are required for all Nonpoint Source Projects. The EPA requires a minimum 40% match of the total cost or portion of the Project for which Nonpoint Source Program grants funds are used. The match requirement for this Agreement is $. Additional match is welcome. Matching funds must come from local, county, or state sources. Funds from a Federal source are not eligible as match. Current match expenditures must be reported with all invoices using Nonpoint Source Grant Agreement Expenditures/Match Report form (Exhibit B).

Action item

If you could please let us know of EPA's recommendation for requiring or not corresponding match with every work-plan invoice, I would appreciate. If we need to modify our existing boiler plate I am happy to do it, otherwise we would continue as we have implemented the 319 program for many years now.

Thank you

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