

EECBG Questions and Answers from FedConnect: Application Related

The following questions and answers have been compiled directly from FedConnect and presented below for your convenience. The questions and answers were selected by ICLEI staff in response to interest from members on certain topics. These are not necessarily all the questions and answers on a given topic but are considered representative. In partnership with Strategic Energy Innovations, ICLEI offers its members a nearly complete, searchable, browse-able database of questions and answers available through FedConnect [here](#).

Q: *My jurisdiction is planning to submit the application by the June 25 deadline and then draft the EECS for submittal later. What forms do I turn in with the initial application and which forms get submitted later?*

A: If you intend to submit your EECS not later than 120 days after the effective date of the award, and your initial application is only to apply for funds to develop the EECS (meaning, you have no "shovel-ready" projects), your application should consist of the following documents: SF424, Project/Performance Site Location, Project Activity Worksheet (showing activity under area 1), Financial Management Assessment, Assurances and SF-LLL (if applicable) When you submit your EECS after the 120 days, you will submit the following (this is my estimate - it is subject to change and will be specified in the grant award documents): Project Activity Worksheets (1 for each activity you are undertaking), SF 424A Budget, Budget Justification, Sub award Budget file (if applicable), EECS, NEPA (if applicable). (04/28/2009)

Q: *If county does not have EECS and will be developing one in the 120 days, can they apply just for this portion by June 25th and then apply with other proposed activities after the EECS is submitted (120 days)? How will they know what projects they want to propose if the EECS is not yet complete?*

A: That is the process. If you do not have an EECS prepared, submit your application with Attachment B1 noting an activity under area 1 (development of the EECS). When you submit after the 120 days, you will also submit a complete slate of activities (1 activity worksheet per activity) and the related budgets. (04/22/2009)

Q: *We have been allocated to receive \$530K. If we intend to submit the EECS not later than 120 days, at this point we would only submit the SF424, Project/Performance, Project Activity, Financial Mgmt Assessment, Assurance and SF-LLL (if applicable). Our plan would be complete an RFP for assistance in writing the EECS. Do we estimate a budget for this? Do we receive the \$250 and just obligate the funds for the consultant?*

A: It is understood that you do not have a budget for the consultant. Once you receive the initial obligation, you will be authorized to use no more than the \$250,000 for the consultant's services. If the consultant's services are <\$250,000, you will not be authorized to use the remaining funds for any other activities until those activities are

approved by way of an amendment to your grant. (05/05/2009)

Q: *Do we need to submit a budget justification file if we are just submitting for funding for an EECS? I note that we have to submit a SF 424A but wasn't sure if we needed the budget justification file, especially if it just shows that the cost of the project was going to be used to hire a consultant to complete the plan.*

A: You do not need to submit a budget justification file with your initial application if you are only applying for funding for the EECS. However, if you do have detail (i.e., hiring Consultant X for Y estimated hours at ZZ/hour), please submit it, even if it is only a small bit of information. (04/28/2009)

Q: *According to pages 17-18 of the FOA, the funded items included in the initial application can be limited to preparation of the EECS. If that is the case, how do we fill out the Budget Information? Page 16 of the FOA states that documentation must be provided with the application for the entire cost of the grant (\$199,200 in our case). However, we will not know how the funds will be spent until the EECS is completed. Please provide guidance. Thanks.*

A: If your allocation is less than \$250,000, 100% of the allocation will be obligated at the time of award. Please estimate to the best of your abilities the funds needed to develop the EECS. If you are only submitting to develop the EECS, you do not have to submit a complete SF424A Budget Form at the time of the initial application. You will have to submit a Budget Form(s) when you provide your full slate of project activities however. (4/23/2009)

Q: *We are an entitlement community with a possible allocation over \$2 million. If we submit an application without an EECS, we will be awarded \$250,000 for the development of an EECS within 120 days. Are we required to expend the full \$250,000 before the 120 days expires?*

A: No. You may receive up to \$250,000 for the development of the EECS. You do not have to expend the full \$250,000 within the 120 days. (04/15/2009)

Q: *What other activities besides hiring a consultant to develop the Strategy could be funded under the initial \$250,000 grant? For example, could a recipient also hire an energy manager, or do an assessment on a building for LEED gold certification?*

A: If an applicant had a "shovel-ready" project, this could conceivably begin also with the initial \$250,000 obligation. If this were the case, the applicant would have to provide an activity worksheet for the "shovel-ready" project and all related budget information. (04/24/2009)

Q: *Are initial applications above \$250K allowed? Will agencies be allowed to submit an initial application including a request for EECS development funds PLUS a few shovel ready projects that combined total more than \$250K? In other words, can an agency with*

a \$1.5 million allocation request \$400K for both a LED traffic light project AND development of an EECS as part of the initial application, and then pursue the remainder of their funding once the EECS has been completed and other projects identified? Thank you.

A: Yes. In accordance with the Staged Disbursement Schedule, Awards above \$250,000 and less than \$2M may receive up to \$250,000 for development of the EECS and approved activities. If you do have an activity that you would like to propose with your initial application, be certain to include an activity worksheet for the activity, as well as all budget information and NEPA information (if applicable). (04/29/2009)

Q: *This question concerns the initial allocation of up to \$250,000 for development of an EECS, as stated on page 10 of the EECBG funding opportunity announcement for DE-FOA-0000013 for formula grants. For cities in the 250,000 to 2 million range, page 10 of the announcement states that applicants may receive up to 250,000 for the development of a EECS via hiring ,outside technical / consultation services. Some information I have seen on webcasts, most notably the US Conference of Mayors webcast on 4-1-09 (see usmayors.org) seemed to indicate that this initial \$250,000 allocation could be received upon request, PRIOR TO THE FULL APPLICATION SUBMISSION. The EECS could then be developed and submitted along with the rest of the application packet by the June 25, 2009 deadline. Other information seems to suggest that applicants must make a full application submission, and AS A PART of that application submission must request the 250,000 allocation. The EECS must then be developed within 120 days of receipt of these funds, and must be approved by the DOE as a condition of receiving the remainder of the formula funding. My question is: Does the initial receipt of up to \$250,000 for development of an EECS require applicants to submit the full application packet? If not, how do applicants request and receive the initial \$250,000?*

A: An applicant (non-State) that intends to submit an EECS no later than 120 days after the effective date of the award should submit a complete application with, at a minimum, an Activity Worksheet detailing work in activity area 1 (Development of an Energy Efficiency and Conservation Strategy), the SF 424, SF 424A, the Financial Management Assessment, the Assurances, and the SF-LLL (if applicable). The Activity Worksheet should indicate the required funding needed to develop the EECS. When the EECS is submitted no later than 120 days after the effective date, the applicant shall also submit a complete slate of proposed activities, including related budget and environmental information (if applicable). (04/08/2009)

Q: *If an entity has been allocated \$5 million and decides to submit its EECS within 120 days after submitting its application - in its application, can it submit just one activity sheet with one budget for \$5 million and say that 1) of that \$5 million, \$100,000 will be spent on developing an EECS and that 2) the rest will be allocated as a result of the EECS development process? And then would the entity receive the \$100,000 initially to prepare the EECS and remain eligible to receive the other \$4.9 million once the EECS is submitted with "a complete portfolio of all proposed activities ... all related budget information, including budget justification, and related NEPA forms"? Or must it at the*

time of its application allocate that \$5 million among the 13 permitted areas? If the subsequent EECS (which will be developed as a result of additional input, possibly including public input) later differs substantially from the 13 permitted areas - instead reallocating the remaining \$4.9 million among 7 permitted areas, for example, would that be allowed?

A: If an entity has been allocated \$5 million and elects to submit the EECS within 120 days of the effective date of the award, the entity's application should include: one activity sheet with an activity under area 1 (for the development of the EECS), an SF 424 and 424A totaling the total allocation amount of \$5M, written assurance for prevailing wages, financial management assessment, and other required assurances if applicable. When the grant award is made, \$100,000 would be obligated for preparation of the EECS. Under this scenario it is not recommended to allocate the remaining \$4.9M funds among the activity areas at the time of application. This should be done with the submittal of entity's EECS. (04/20/2009)

Q: *The City of Savannah, GA is currently undergoing a major move and upgrade to our servers/data center. Once completed this new data center will be the greenest in Georgia, will save the City hundreds of thousands of dollars every year in energy consumption and will make our network less susceptible to hurricane and flood damage. The current facility is not safe in inclement weather and the new facility will be a part of our Emergency Operations Headquarters. Because we have to move quickly (hurricane season is in less than two months away) could we possibly reimburse a portion of the costs related to the relocation and technology upgrades if we receive the stimulus dollars for the project. In addition to helping progress the project, the ability to reimburse ourselves will help us balance our general fund budget and will potentially save several City jobs and programs.*

A: You could possibly receive reimbursement if the activity is one of the approved EECBG activities. This would be considered a pre-award cost and would be incurred at your own risk until DOE evaluates and approves the cost with your application. Requests for pre-award cost reimbursement should be detailed in your application. DOE will review the request to determine if the costs were incurred in direct support of the project and if the costs are reasonable, allowable, and allocable in accordance with the appropriate cost principles. (05/07/2009)

Q: *Our county has an allocation of \$2,267,000 for EECBG formula funds. I understand that we could be reimbursed for pre-award costs incurred not more than 90 days prior to the award. However, we would like to hire a consultant to assist us in developing our EECS and to assist us in completing our application. We would like to start that as soon as possible. How can we get permission for reimbursement of pre-award costs for these efforts that are incurred over 90 days prior to the award. If we could obtain such permission, we could be well on our way to preparing our EECS and defining our activities by the application date. Thank you.*

A: Any costs incurred prior to award are done so at the applicant's risk. The pre-award costs for the consultant should be included in the application and will be subject to approval depending on their reasonableness, allowability and allocability. No pre-award costs incurred prior to the date the Recovery Act was passed (2/17/09) will be considered. (04/20/2009)

Q: *Could you please provide a list of activities that would be considered eligible for the 10% administrative funds? It appears that the hiring of a staff person to administer these grant funds would be considered a direct cost to the grant, not administrative. Is this true?*

A: That is correct. Administrative activities are those that cannot be identified with any single program but are necessary to the general conduct of the activities of the entity organization. This could include such items as the overall direction of the organization, record keeping, budgeting and business management. EISA specifically notes that the cost of meeting the reporting requirements of the EECBG Program is excluded from the administrative cost limitation. (04/18/2009)

Q: *Will funding for preparation of the strategy plan come out of the administrative funds, or will that be part of the programmatic funding?*

A: Costs for preparation of the EECS is one of the allowable activities and is not considered under the administrative cap. (04/20/2009)

Q: *Can EECBG funds be used to hire staff? And if so, is this limited to the \$75,000 administration limit? Can EECBG funds be used to create an Energy Office? If this is a new program for our county, can staff be hired, exceeding the \$75,000 limit, as a program expense and not an administration expense?*

A: EECBG funds could be used to hire staff. Whether or not the administrative limit applies depends on the nature of the staff hired. Someone devoted fully to the project, such as a project manager, would likely not be considered administrative. (Other questions/answers have been posted on this topic) Can funds be used to create an Energy Office? Interesting question. This could potentially fall under Area 6. Could this office continue to exist after the grant expires so that a long-term benefit is realized? Could you leverage funds to make this happen? I don't think this is outside the realm of possibilities, but you need to fit it into an activity area and show the benefits related to the program principles and outcomes listed in the announcement. (04/15/2009)

Q: *If our formula allocation is \$1.689,000 million, can we include \$168k for Administrative Costs (recordkeeping, budget tracking, invoicing, etc.) and \$270k for the staff members that will implement and manage the overall strategy and programs? Or, based on our formula allocation, is the maximum amount we can include under the classification, "Administrative Costs" for staff, \$168k to develop, implement and manage our overall EECBG strategy and programs?*

A: Staff members who are implementing and managing the overall strategy and programs can be considered direct costs and would therefore not be included under the administrative cap of \$168k. (04/30/2009)

Q: *(none)*

A: CLARIFICATION ON REPORTING COSTS

For State Applicants only: the 10% administrative cap INCLUDES the cost of reporting. For all other Applicants: the 10% administrative cap EXCLUDES the cost of meeting the reporting requirements.

These funding limitations are taken straight from EISA. (05/06/2009)

Q: *If a municipality creates an energy-audit and green building code inspection program, and trains a permanent staff member to perform the EECBG program-related work, may they fund that inspector's salary and benefits for the entire position, or for the portion of staff time spent on those activities? Also, from the details given in previous questions about administrative costs, this type of activity would not be subject to the 10% general program administration cap, correct? An explanation of this difference as well as the activity limits of funding staff time would be appreciated. Thank you!*

A: If the work of the staff member benefits only the EECBG program, then it is acceptable to note his/her costs are a direct expense. DOE does not have a limit on the funding of staff time. It is up to the applicant to create a proposed budget that will successfully achieve the EECBG Program goals. Administrative activities are those that cannot be identified with any single program but are necessary to the general conduct of the activities of the entity organization. This could include such items as the overall direction of the organization, record keeping, budgeting and business management. EISA specifically notes that the cost of meeting the reporting requirements of the EECBG Program is excluded from the administrative cost limitation. (05/05/2009)