



United States Environmental Protection Agency
Washington, DC 20460

**Office of
Administration
And Resources
Management**

Bill Thompson
Chair
National Tribal Air Association
P.O. Box 15004
Flagstaff, AZ 86011-5004

Dear Mr. Thompson,

I received your March 11, 2014 letter responding to the Environmental Protection Agency's (EPA) initiation of consultation and coordination with federally-recognized Indian Tribes on the Electronic Submission of Grant Applications Requirement, which is expected to take effect in Fiscal Year 2015. EPA's Office of Grants and Debarment (OGD) appreciates your time and effort reviewing the requirement. We welcome your comments regarding the requirement.

This letter is a formal response to the comments made in your March 11, 2014 letter. I understand your concerns about internet capacity. EPA remains very committed to environmental justice for Tribes and indigenous communities. For this reason we are taking steps to ensure that Tribes and indigenous communities with limited access to the internet will still have the ability to apply for funding opportunities. Grants.gov offers the option of downloading application packages so you may complete them offline. This is particularly helpful for applicants with unstable internet connections. If an applicant experiences difficulties downloading or uploading application package (or with any other part of the process), they should contact Grants.gov customer service, which is available 24 hours a day, 7 days a week at 1-800-518-4726 and support@grants.gov. I understand, however, that the option to download does not satisfy the concerns of applicants with very limited or no internet capacity. As a result, EPA has established an annual exception policy for applicants that meet this criteria. Information on how to apply for an annual exception can be found at http://www.epa.gov/ogd/grants_gov_submission_requirement.htm and on the attached fact sheet.

In the case of unexpected technical difficulties immediately before a deadline, like internet service becoming unavailable unexpectedly, there will be instructions in Section IV of each competitive opportunity that describe what to do in this situation. They also be found at http://www.epa.gov/ogd/grants_gov_submission_requirement.htm and on the attached fact sheet.

With respect to Executive Order 13175 Consultation and Coordination with Indian Tribal Governments, we are complying in good faith. OGD is following EPA's own consultation and coordination process as established under EPA's Policy on Consultation and Coordination with Indian Tribes (<http://www.epa.gov/tp/consultation/consult-policy.htm>). We considered all of the comments we received from tribes and made significant adjustments to our approach to implementing the Grants.gov requirement. Please consider attending the teleconference/webinar EPA is hosting on September 4, 2014 to learn more about what EPA is doing to accommodate the concerns raised during the consultation process (details can be found at http://www.epa.gov/ogd/training/grats_gov_informational_sessions_for_tribes.htm).

EPA recognizes that applicants will need support in using Grants.gov. The effective date of the requirement has been changed from October 1, 2014 to February 17, 2015 to allow more time for training and for tribes to register appropriate personnel. EPA has partnered with the Grants.gov program managers to offer

training sessions that will take applicants through the registration and application submission processes. We will offer a series of sessions to accommodate a variety of time zones and schedule. We will also record a session and make it available online for those that cannot make the sessions as scheduled. Information about these training sessions will be posted at http://www.epa.gov/ogd/training/grants_gov_informational_sessions_for_tribes.htm. There are also very helpful step-by-step resources for applicants that need to learn the system or refresh their capacity to use the system. Training videos, user guides, quick start guides, and more can be found at <http://www.grants.gov/web/grants/applicants/applicant-resources.html>. As previously stated, Grants.gov also offers around-the-clock customer service to all its users.

I hope I have successfully answered your questions and addressed your concerns. The official EPA contact person for this consultation and coordination process is Elizabeth January, Program Analyst. Please do not hesitate to contact Elizabeth January at january.elizabeth@epa.gov or 617-918-8655 should you have any further questions on this action.

Sincerely,

Howard F. Corcoran

Howard Corcoran
Director, Office of Grants and Debarment

cc: Elizabeth January, OGD
Denise Polk, OGD
Carson Hodges, OGD
Rodges Ankrah, AIEO
Pat Childers, OAR
Danny Gogal, OEJ