



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
MISSION SUPPORT

July 3, 2019

**MEMORANDUM**

**SUBJECT:** Waiver from Grants Management Training Requirement for Non-Profit Applicants and Recipients in EPA Order 5700.8, EPA Policy on Assessing Capabilities of Non-Profit Applicants for Managing Assistance Awards

**FROM:**

Denise Polk, Director  
Office of Grants and Debarment

A handwritten signature in black ink that reads "Denise A. Polk".

**TO:**

Assistant Regional Administrators  
Deputy Assistant Administrators  
Grants Management Officers  
Grants Junior Resources Officials  
Grants Customer Relations Council

**PURPOSE**

The purpose of this waiver is to eliminate the requirement that all non-profit applicants and recipients of EPA federal financial assistance complete the mandatory Grants Management Training for Non-Profit Applicants and Recipients prior to drawing down funds as described in [EPA Order 5700.8](#).

**BACKGROUND**

Section 19.0, Roles and Responsibilities, of EPA Order 5700.8 requires Grants Management Offices (GMOs) to ensure non-profits complete mandatory Grant Management Training for Non-Profit Applicants and Recipients prior to recording an affirmation of acceptance in EPA's grants management system. EPA's Office of Grants and Debarment (OGD) developed the following national term and condition applicable to all non-profit recipients:

Recipient acknowledges that two employees of this recipient organization must complete the mandatory on-line training, "EPA Grant Management Training for Non-Profit Applicants and Recipients." One person must be the project manager, or equivalent, for this assistance agreement. The other individual must be the person authorized to draw down funds for this assistance agreement. Both employees must complete the training prior to the receipt of any grant funds...

At the end of the course the recipient must sign and return the certificate of completion to the appropriate grants office. EPA will not release funds to the recipient until the

required training is completed. Certifications must be maintained throughout the life of the agreement. The training must be completed every three (3) years by both employees and when there are personnel changes.

Since a signed affirmation of acceptance is no longer the means in which a recipient demonstrates its commitment to carry out an award, the requirement placed on GMOs in the Order is no longer relevant.

Further, OGD's current risk management approach to grants management is holistic in nature and does not target a specific entity type. OGD is replacing the non-profit training course with an updated optional grants management training for all applicants and recipients regardless of entity type. Since the new training is available to all applicants and recipients, it is no longer necessary to require training for only non-profit applicants and recipients.

In order to eliminate the non-profit training requirement, a waiver from Section 19.0 of EPA Order 5700.8 is necessary.

### **ACTION**

As authorized by Section 16.0, Waivers of EPA Order 5700.8, I am granting a waiver to the requirement that all non-profit applicants and recipients complete the mandatory Grants Management Training for Non-Profit Applicants and Recipients prior to accepting an EPA assistance agreement.

Effective July 3, 2019, GMOs must discontinue the use or implementation of the national non-profit training term and condition on new or current assistance agreements. In addition, non-profit recipients will no longer be required to take the non-profit training or maintain training certifications. The national non-profit training term and condition will be marked obsolete in EPA's grants management system. OGD will alert the recipient and applicant community of the changes to training requirements of EPA Order 5700.8 accordingly.

cc: Wendel Askew, Office of General Counsel  
Laurice Jones, Office of Grants and Debarment  
Alexandra Raver, Office of Grants and Debarment  
Jessica Durand, Office of Grants and Debarment