ALL OF THE FAQ'S LISTED BELOW APPLY TO BOTH THE HAZARDOUS MATERIALS WORKER HEALTH AND SAFETY TRAINING (RFA-ES-14-008) AND HAZMAT TRAINING AT DOE NUCLEAR WEAPONS COMPLEX (RFA-ES-14-009) UNLESS SPECIFICALLY NOTED. THESE FAQ'S ARE DIVIDED INTO FOUR AREAS: PROGRAM/TECHNICAL; BUDGET; GENERAL; REVIEW.

Updated: October 31, 2014

PROGRAM/TECHNICAL:

1. Question: We only want to apply for the Environmental Careers Worker Training Program (ECWTP). Is this acceptable?

NIEHS Response: *No.* As stated in the RFA-ES-14-008, only HWWTP applicants may apply for the ECWTP or the Hazmat Disaster Preparedness Worker Training Program (HDTP).

2. Question: According to the Hazardous RFA, there's no limiting language regarding training coverage, thus the scope covers workers, health and protection from hazardous waste work and hazardous substances in the broad sense. Could you give us an interpretation of what that means?

NIEHS Response: You are not strictly limited by regulatory language, in the sense of strategies for protecting workers that might encompass things beyond training such as personal protective equipment. From an industrial hygiene point of view, it could be anything on the "pyramid of protection".

3. Question: Aside from the hot themes/new emerging areas that you mentioned in the RFA, like nanotechnology and a few others, how else can we as grantees help you achieve your goals or meet your needs for addressing any new topics?

NIEHS Response: For all applicants, we think the best approach is to look at your core strengths and base your application on that. The new challenges and your purposed training that will evolve will have merit if you focus on your strengths. Remember to keep things clear, based on your track record, and demonstrate your access to specific training audiences and their need for training during the upcoming five years.

4. Question: How would we make an OSHA 10 or 30 class fit into the NIH model, other than adding hands on components to what we've been successful at?

NIEHS Response: By following the Minimum Criteria, as you are required, for all of the courses conducted under this program, you will bring a great deal of quality control and assurance to the implementation of these programs. The Minimum Health and Safety Training Criteria: Guidance for Hazardous Waste Operations and Emergency Response (HAZWOPER) Supporting and All-Hazards Disaster Prevention, Preparedness, and Response can be found at http://tools.niehs.nih.gov/wetp/public/hasl_get_blob.cfm?ID=2465

5. Question: Where are the existing curricula located on the web for the NIEHS Worker Training

Program?

NIEHS Response: As stated in the RFAs, a list of curricula developed by current NIEHS awardees is available from the National Clearinghouse on the web at http://tools.niehs.nih.gov/wetp/index.cfm?id=603

6. Question: How many individuals does NIEHS "expect" each Grant Applicant to train during the 5-year grant lifetime?

NIEHS Response: The applicant must determine who to train and the number of individuals to train depending on intended target audience and training plan.

7. Question: Are there any Letters of Intent between stakeholders, trainees, or Perspective Employers required? If so, are they required for 100% of trainees?

NIEHS Response: Traditionally letters of support are provided with the application to detail the commitment of consortium members and consultants and from employers to state that the applicant has access to the target population or that individuals trained under the ECWTP component will be hired or considered to be hired as a result of their training.

8. Question: Historically, do all or most of your Grantees (People You Fund) re-apply? With their track record, is there still room for new grantees, serving a previously un-served population?

NIEHS Response: Most grantees do reapply. Awards have been granted to new, first time applicants. All applications are reviewed individually based on the merits of the application. The target audience must be clearly delineated and meet requirements under each program component. New organizations which have experience in developing and successfully operating a worker training program are encouraged to apply.

9. Question: Are we required to find jobs for all graduates?

NIEHS Response: Under the ECWTP, you are required to recruit, train and diligently work to obtain gainful employment for the graduates of the program.

10. Question: The RFA does not clearly specify if NIH is limiting the number of applications that can be submitted by a single institution. Please clarify.

NIEHS Response: Only one application per institution/organization will be accepted.

11. Question: If our HWWTP proposes work in more than two states, is it necessary for the HDPTP to also propose work in more than two states? The HDPTP proposal we are planning primarily addresses work needs in a particular state. Do we need to also include active projects in at least one other state?

NIEHS Response: There is not specific language that requires the HDPTP portion of the application to conduct work in more than one state, but in times of a nationally declared emergency under our Emergency Support Activation Plan and the terms of the cooperative agreement we may ask for awardees to assist in providing health and safety training in locations other than what is proposed.

12. Question: Under HWWTP Specific Goals and Objectives, Please clarify what is meant by the following statements on page 9 of the FOA:

"There is no limiting language regarding training coverage. Thus, the scope covers worker health protection from hazardous waste work and exposure to hazardous substance in the broadest sense." Given these statements, can HWWTP provide training to community residents to prepare them for climate change events and to promote community resiliency? If the proposed HWWTP is designed to serve primarily disadvantaged small businesses, volunteer/underfunded first responder operations and vulnerable workers, does NIEHS expect the program to generate program income?

NIEHS Response: Please refer to the FOA, under section On-going Program Initiatives as we have stated the following: "As for climate change events and sea level rise, environmental cleanup workers, which may include community members, and emergency responders must be trained to address hazards associated with the increase in frequency and intensity of climate events as described in Executive Order 13653-- Preparing the United States for the Impacts of Climate Change.

As far as program income, we have stated in the FOA that … Since this program restricts indirect costs to 8%, applicants are also strongly encouraged to develop plans to generate program income to assist in supporting efforts under the HWWT and HDTP components. For clarification, as per NIH Grants Policy Statement, program income is gross income earned by a grantee, a consortium participant, or a contractor under a grant that was directly generated by the grant-supported activity or earned as a result of the award. Program income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under the grant, the sale of commodities or items fabricated under an award, and license fees and royalties on patents and copyrights.

13. Question: Under the ECWTP Specific Goals and Objectives, FOA Page 12 states, "Each program should develop specialized training specific to the workforce needs of their geographic area, however, hazardous materials and waste training remain the primary core curriculum." Because of job market demands in our geographic area, we plan to offer occupational skills training in specific high demand fields coupled with relevant OSHA health and safety training consistent with CFR 29: 1910. Since these fields have not traditionally been the main focus of MWT and are not directly mentioned in the FOA document, will our plan be allowable? How can we assure that our training plan will not be viewed as non-responsive by the readers?

NIEHS Response: For the ECWTP, we stated in the FOA under Training Program that applicants should….
"conduct pre-apprenticeship, apprenticeship programs for construction and environmental remediation worker training, and other emerging environmental fields such as green jobs training

and other training described in this section such as hazardous waste, asbestos, lead, etc."

The applicant must provide evidence and or make a strong case for training in manufacturing and health related industries as it relates to goals and objectives of this training program.

Lastly, applications are reviewed by NIH staff for responsiveness to the FOA. Those that are not responsive are returned without review.

14. Question: Our current understanding of HWWTP, as distinguished from ECWTP, is the following: HWWTP focuses on issues of industrial safety (e.g. chemical spills on site) and on programs offering general hazardous materials training (e.g. how to safely transport, handle or clean up hazardous chemicals). ECWTP approaches hazardous waste worker training from an environmental justice perspective, specifically empowering individuals in communities near hazardous waste sites or brownfields sites (through this training) to protect their health and the health of their community. Is this correct?

NIEHS Response: The HWWTP is not just about industrial safety. This training is broad and can encompass a large segment of environmental, hazardous materials and waste training and should focus on workers already engaged or may be employed in these fields. Please refer to the FOA as it clearly states- under HWWTP Goals and Objectives -Applicants should be familiar with SARA Section 126 requirements for training. This identifies workers to be trained based on potential exposure and health risk and requires training for personnel engaged in hazardous substance removal or other activities, such as those involved in transportation, which expose or potentially expose such workers to hazardous substances. In addition, training is required for workers who may be exposed to unique or special hazards. Different levels of training for hazardous materials, waste workers and supervisors is delineated in this section and depending on their role in the response activity training should be tailored to and specific to the hazards. For example, training described in a site safety plan based on the job hazard analysis of the site should be followed according to the standard.

For the ECWTP you are correct in your statement that the ECWTP does promote empowering individuals in communities near hazardous waste sites or brownfields sites (through this training); however, the ECWTP is clearly a workforce development/ job training program to place individuals in jobs in the environmental, construction and hazardous materials, waste fields for those who are underemployed or unemployed.

15. Question: ECWTP has a narrower focus than HWWTP. When applying for ECWTP, should an applicant narrow the focus of their entire HWWTP proposal to ECWTP initiatives? Or should their program contain an ECWTP-focused component AND (within) a broader HWWTP program?

NIEHS Response: The applicant must determine the focus for your HWWTP as it pertains to who you want to target and the type of training needed for your target population. Remember for the HWWTP, this training is broad and can encompass a large segment of environmental and hazardous materials and waste training and should focus on workers already engaged or may be working in these fields.

16. Question: The title of ECWTP was recently changed from MWTP. Would you please explain the reason(s) for this change, and whether/how the shift in program title reflects a shift in the priorities and goals of the program?

NIEHS Response: In the FOA, it states that the ECWTP…. Over the years the program has evolved to focus on delivering comprehensive training to increase the number of disadvantaged and underrepresented minority workers in many areas such as environmental restoration, construction, hazardous materials/waste handling as well as emergency response.

17. Question: You shared some examples with us of innovative training programs proposed by past grantees (solar energy, nanotechnology, fracking). Is it a correct interpretation of these examples to conclude that HWWTP and ECWTP applicants may train workers in environmental fields that do not necessarily focus on hazardous materials (e.g. solar), provided they also train workers in handling hazardous wastes?

NIEHS Response: No, that is not correct. If you are focusing on new innovative training under the HWWTP, you must focus on the health and safety hazards associated with that new innovative technology and how to mitigate those hazards. For example, under nanotechnology- NIEHS developed a report on **Training Workers for Risks in Nanotechnology**. The report is the first one to address the critical issue of how workers who are creating and handling nanomaterials should be trained about the hazards they face - in laboratories, manufacturing facilities, at hazardous waste cleanup sites and during emergency responses. Given the limits in the current understanding of nanotoxicology, workplace exposures and effectiveness of control strategies, defining effective training is particularly problematic. But workers clearly have the potential to be exposed and are guaranteed the right to know about the risks they face, under international hazard communication standards that are being harmonized across the globe.

Under the ECWTP, you can develop training on how to install solar panels and we strongly encourage you to make the training include on how to do it safely by describing the hazards and how to mitigate those hazards as this program is a job training and workforce development program as the HWWTP is not.

18. Question: Is there an age cohort that ECWTP targets? It is our understanding that MWTP formerly focused on young adults.

NIEHS Response: No

19. Question: For the ECWTP program, can we count internships toward contact hours?

NIEHS Response: Yes, internships or on the job training can count toward contact hours. Please note that a structured program must be developed that details the rigor of the internship or on the job training just as a course to show, goals, learning objectives, outcomes and what constitutes completion or passing the training.

20. Question: For the ECWTP program, does training HAVE to be provided in English? Or can we provide training in Spanish so long as we can find non-English-speaking workers jobs? I

didn’t see any prohibition on Spanish-only training, but I’m asking for clarification because I did see an example of using a English language requirement as a way to pre-screen applicants.
NIEHS Response: Yes, training can be in Spanish or other foreign languages. You must ensure that the individual can be employed, can pass certification or other requirements for employment that may require testing or understanding in English. You may want to consider adding to your training plan specific life skills training such as English as a Second Language or other specific and culturally appropriate job readiness training to assist the worker with limited English skills to success on the job.

BUDGET:

1. Question: Are grantees allowed to pay travel costs associated with the Applicant Information Meeting on September 18, 2014 in NC from grant funds, or is it an organizational cost?

NIEHS Response: As a point of clarification, NIEHS grant funds may NOT be used to attend the application information meeting that will be held September 2. These costs are considered 'costs of doing business' and are unallowable under the grant.

2. Question: Are grantees allowed to pay for travel costs associated with the Applicant Information Meeting on September 18, 2014 in NC with program income?

NIEHS Response: Program income CANNOT be used. Program income is to be used to support the on- going program. Preparing for and submitting an application is not part of the program. HHS Grants Net: http://grants.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part8.htm "Regardless of the alternative(s) applied, program income may be used only for eligible costs, in accordance with the governing statute, any program regulations, the applicable cost principles, and the terms and conditions of the award."

3. Question: What is the total funding level for ECWTP?

NIEHS Response: Total funding depends on appropriations each year; however, we anticipate awarding approximately $3.5 million for the ECWTP.

4. Question: Does NIEHS have a policy on paying stipends for ECWTP training participants? Many thanks for any additional feedback — and apologies if an answer is available online, I was unable to find one.

NIEHS Response: Yes, student incentives are allowed. Please use this term in your application instead of student stipends. Per the NIH Grants Policy Statement-- Incentive payments to volunteers or patients participating in a grant-supported project or program are allowable. Incentive payments to individuals to motivate them to take advantage of grant-supported health care or other services are allowable if within the scope of an approved project. See Salaries and Wages/Bonus Funds & Incentives in this exhibit for incentive payments to employees.

You must list any student incentive costs in other expenses. Enter the number of students and the total student incentive amount for each student. Fully justify these expenses on separate pages as follows.

Applications which request student incentives must contain a strong justification substantiating the need for them, the rationale as to why such support cannot be provided by other means, and the degree of any cost sharing proposed by awardees. Request for student incentives will be given close scrutiny.

In reference to travel list any trainee/student travel costs in other expenses also. Describe the purpose for any travel and subsistence expenses, giving the numbers of trips involved, the destinations, and the number of students for whom funds are requested. Applications which request travel funds for students must contain a strong justification which substantiates the need for such funds, the rationale as to why such support cannot be provided by other means, and the degree of any cost sharing proposed by awardees. Requests for student travel funds will be given close scrutiny.

5. Question: Does program income have to be used in the same year it is generated?

NIEHS Response: Grants Policy Statement 8.3.2 Program Income, does not specifically state Program Income has to be used in the "same year" it is generated. It only provides guidance as to how Grantees should report the Program Income on the FFR(s). It also states that, "unless otherwise specified in the "terms and conditions" of the award, NIH grantees are not accountable for program income accrued after the period of grant support". There was nothing specific in our T&Cs regarding Program Income. Until Grants Management is given more oversight on Program Income, we would say indirectly, the answer is "No" it does not have to be used in the year it is generated.

6. Question: Please confirm that under the DOE FOA -RFA-ES-14-009, that applicant's that are submitting renewal (competing continuation) applications cannot request a ten percent increase above the budget level (direct cost) of the last year of their continuation project (non-competitive renewal) as I did not see it in the application.

NIEHS Response: - It is recommended that applicant's that want to request more than a ten percent increase above their last year's budget level (direct cost) in their Renewal (competing continuation) application provide a request in writing with a strong justification for the increase to the Program staff prior approval to submitting the application.

7. Question: What is the best way to structure my multi-project application from a budget perspective?

NIEHS Response: NIH has provided a basic framework for multi-project applications. However, there is some flexibility within that framework regarding how to put together an application. Some applicants decide to structure their applications with the applicant organization leading every component within the application. Other applicants have collaborating organizations lead a subset of components within their applications.

Many factors can influence how you decide to structure your application. An application's budget is important, but it should not be the primary consideration in your decision. Funding Opportunity Announcement guidelines, NIH policy, your own organization's policies, the role any collaborating organizations will play in the proposed research, where the research will be carried out, and other factors should also be considered. *In the end, your multi-project application should be structured to reflect the scientific and administrative needs of the proposed research.*

Once you decide how you are going to structure your application, filling out the component forms (including budgets) is fairly straightforward. Treat each component like it is a standalone application. If the applicant organization is leading a component, then all the forms in that component should be completed from the perspective of the applicant organization. If a collaborating organization is leading a component, then all the forms in that component should be completed from the perspective of the collaborating organization.

8. Question: When a collaborating organization leads an entire component, is it still considered a subaward/consortium to the applicant organization?

NIEHS Response: Yes. The R&R Cover form within each component is used to identify which organization is leading the component. Having a DUNS on the component R&R Cover that is different than the DUNS provided on the Overall R&R Cover form informs NIH systems that the budget information included in the component should be considered subaward/consortium costs to the applicant organization. Even when a collaborating organization leads a component, the applicant organization is still ultimately responsible for the entire application.

9. Question: When a collaborating organization leads an entire component, should the Budget Type on the R&R Budget form be set to 'Project' or 'Subaward/Consortium'?

NIEHS Response: ASSIST automatically marks the Budget Type field on the R&R budget form to 'Project'. The 'Project' designation simply indicates it is the main budget for the component. NIH systems use the DUNS number and not the Budget Type field to determine if the budget form is completed from the perspective of the applicant organization or a collaborating organization.

10. Question: Why doesn't the Overall component include a budget form?

NIEHS Response: Electronic multi-project applications are made up of an Overall component that describes the entire application and some number of additional components where the work is actually carried out. Although the SF424 R&R Cover form includes an estimated Project Funding section that must be completed, the Overall component doesn't have a dedicated budget form that applicants can fill out. Instead, applicants fill out an R&R Budget form for each of the additional components and any related subaward budget forms. NIH systems present a summary of the budget information with the Overall component.

11. Question: How are the system-generated summaries that are displayed with the Overall component calculated?

NIEHS Response: Assembled application images include three budget summaries: a Composite Application Budget Summary, a Component Budget Summary and a Categories Budget Summary. A resource that describes the different parts of a multi-project assembled application image (including the various system-generated summaries) can be found at: http://grants.nih.gov/grants/ElectronicReceipt/files/Electronic_Multi-project_Application_Image_Assembly.pdf

12. Question: Why don't budgets marked Subaward/Consortium show in the Component Budget Summary?

NIEHS Response: **The summaries provide a roll-up of the activity across the components of the application.** The Component Budget Summary is just that - a summary of the main budgets for each component. It is not meant to be a listing of the cumulative budget pages of every budget form included in the application. The detailed budget forms supporting the summaries are included in the application image within their components.

13. Question: How do you change the DUNS and Organization information displayed on a component budget form?

NIEHS Response: **In ASSIST, the DUNS and Organization Name fields from the R&R Cover automatically populate the DUNS and Organization Name fields on the R&R Budget form**. Although the fields on the budget form are not editable, edits to the R&R Cover form are reflected on the R&R Budget form.

14. Question: Should I include cents in the dollar fields on the budget form?

NIEHS Response: **Per Application Guide instructions, all dollar fields should be presented in whole numbers even though the fields allow cents to be entered.**

15. Question: Why is the R&R Budget form tab missing from my component?

NIEHS Response: **You may not have the authority to view or edit budget data for the component. Have a Signing Official (SO) or someone with the Access Maintainer role check your privileges using the Manage Access action in ASSIST**. They can add the ability to View or Edit budget data for the component or the entire application as appropriate.

16. Question: How do you add subaward budget forms to a component in ASSIST?

NIEHS Response: **Many component types include the optional form necessary to add additional subaward budgets to a component.** Since the form is optional, it will not automatically appear in the form tab navigation of the component. While on the Summary page of the component, click on the Add Optional Form button under Actions. You will be presented with the list of available optional forms. Select Subaward Budget and the form will be added to the form tab navigation.

ASSIST automatically marks the Budget Type field of each subaward budget form to Subaward/Consortium. Carefully enter the DUNS number of the subaward organization. eRA systems use the DUNS information when doing summary roll-ups.

17. Question: Does ASSIST automatically add up the costs of subawards within a component to populate line F5 – Other direct Costs Subaward/Consortium/Contractual Costs on the main budget form?

NIEHS Response: No. Remember, F5 - Other Direct Costs Subaward/Consortium/Contractual Costs can include contractual costs in addition to the Subaward/Consortium costs found on the subaward budget forms; auto calculating this field would limit the ability to add those additional costs. The total direct and indirect costs for all subaward/consortium budgets within a component (along with appropriate contractual costs) must be manually entered on line F5 of the component's main budget (the one with Budget Type Project).

18. Question: How can I tell if my application falls within the direct cost limit designated in an FOA?

NIEHS Response: NIH continues to support the policy established in 2004 regarding applications that involve consortium/contractual F&A costs (see NOT-OD-05-004). This policy allows applicants to exclude consortium/contractual F&A costs when determining if an application falls at or beneath any applicable direct cost limit.

The budget summaries included in a multi-project application reflect the budget categories of the R&R Budget forms used federal-wide and do not reflect this NIH-specific policy. For example, the Direct Costs listed on the Composite Application Budget Summary include all subaward costs (including consortium/contractual F&A costs) since those costs are direct costs to the applicant organization. Consequently, the Direct Cost line in that summary cannot be used to determine if the application falls at or beneath any direct cost limit.

To determine if an application falls at or beneath a direct cost limit the following **manual** calculation must be done for each budget period:

Take the Direct Cost amount from the Composite Application Budget Summary and subtract the Indirect Costs from the main budget of any component not led by the applicant organization. The 'R&R Budget Section H. Indirect Costs' category within the Categories Budget Summary lists the F&A of all components in one place and is a handy reference while doing this part of the calculation. Then subtract the Indirect Costs from all subaward budget forms associated with components led by the applicant organization.

Notes:

- NIH staff will determine if an application falls at or beneath a direct cost limit after submission. eRA systems will not stop the submission of an application based on direct cost limits. You are welcome to include in your application cover letter your calculation for meeting the cost limit.

- This is a rather cumbersome calculation. NIH is looking at ways to systematically calculate the adjusted direct cost values and present them in the application image (and image preview). However, there is currently no timeline for such an enhancement.

19. Question: How do I complete the R&R Budget form for a component or subaward that is not active for all periods of the entire application?

NIEHS Response: Simply fill out the minimal required information for the inactive budget periods and complete all information for the active periods.

For example, let's say Project-004 of your multi-project application does not start until budget period 2. In the Project-004 R&R Budget form for period 1 you would:

- Select the appropriate Budget Type (the selection of Project or Subaward/Consortium is already made for you in ASSIST)
- Provide the Budget Period 1 Start and End Dates (the Start Date is already pre-populated for you in ASSIST)
- In Section A - Senior/Key Person, include the project lead specifying their role, .01 effort under Calendar months, $0 for Requested Salary and $0 for Fringe Benefits
- Attach your Budget Justification including an explanation for the delayed start

Complete the remaining budget periods following standard instructions.

20. Question: Our organization's F&A rate uses a modified total direct cost base which excludes sub-recipient charges after the first $25,000. How do I account for the first $25,000 in my multi-project budget?

NIEHS Response: Many negotiated F&A rate agreements use a modified total direct cost (MTDC) base rate and include the following language:

"Modified total direct costs, consisting of all salaries and wages, fringe benefits, materials, supplies, services, travel and subgrants and subcontracts up to the first $25,000 of each subgrant or subcontract (regardless of the period covered by the subgrant or subcontract). Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, student tuition remission, rental costs of off-site facilities, scholarships, and fellowships as well as the portion of each subgrant and subcontract in excess of $25,000."

Section H - Indirect Costs on the R&R Budget forms allow you to specify an Indirect Cost Type, Rate and Base and multiple entries in this section are allowed. The first $25,000 of the Total Direct and Indirect Costs of each Subaward/Consortium organization for which you have an agreement can be included in the Indirect Cost Base. This is pretty straight forward and works well for single project applications. However, it is a bit more complicated with multi-project applications. Let's look at a few scenarios.

Scenario 1*: Organization A is the applicant organization on a P01 and has structured their application such that they lead all the components of the application. Organization B is a* *subaward on Project-001 with a total cost of $50,000 and a subaward on Project-002 with a total cost of$25,000.*

Although A has listed B under two projects, generally A can only apply the first $25,000 of organization B’s total costs to the Indirect Cost Base.
Scenario 2*: Organization A is the applicant organization on a P01 and has structured their application such that they lead all but two components of the application. Organization B leads the remaining two components with total costs of $50,000 and $25,000. None of the components have subawards.*

In this scenario, Organization B is actually a subaward to organization A and the Overall budget (calculated by eRA systems and presented as the Composite Budget Summary) should allow for the first $25,000 of organization B’s costs to be applied to the Indirect Cost Base. However, an issue has been identified with the system-generated Composite Budget Summary. When an application includes components that are for organizations that have different DUNS than the Applicant Organization DUNS, the Indirect Cost calculation may appear less than expected since the first $25,000 of those organization costs are not applied to the applicant budget. No action is required from the applicant, although applicants always have the option to document any concerns over system-calculated information in the budget justification of any component. The application review is not affected by this issue and NIH will correct the budget calculations administratively.

21. Question: Based on internal organization rules, we do not allow collaborating organizations to lead components within our multi-project applications. ASSIST does not allow the R&R Cover of a component and the main R&R Budget form to have different DUNS. How do I fill out the budget form for components where the project lead and all incurred costs are actually at a collaborating organization?

NIEHS Response: If you feel strongly about retaining leadership of a component, but only have subaward/consortium costs associated with that component, then you will need to fill out the main Project budget for the component using the information from the applicant organization with the minimum required information and fully complete the subaward budget for the collaborating organization**.**

For the Project Budget you will need to:

- Provide the Budget Period 1 Start and End Dates (the Start Date is already pre-populated for you in ASSIST)
- In Section A - Senior/Key Person, include the project lead specifying their role, .01 effort under Calendar months, $0 for Requested Salary and $0 for Fringe Benefits
- Attach your Budget Justification including an explanation that costs are actually reported in the Subaward/Consortium budget forms for the component

22. Question: Who should I contact when I have a budget question?

NIEHS Response: Although the eRA Commons Help Desk is well versed in handling questions related to eRA systems, including ASSIST, they may not be able to address all your budget questions. The Financial/Grants Management Contact listed in Section VII – Agency Contacts of each FOA is your best bet for budget questions beyond the mechanics of entering budget data in the electronic forms.

23. Question: Is the indirect cost rate of 8% for both the DOE RFA-ES-14-009 and HWWT FOA's RFA-ES-14-008?

NIEHS Response: Yes, as stated in each FOA, "Allowable indirect costs for this program are limited to 8% of a modified indirect cost base which excludes amounts over the first $25,000 for each consortia agreement, equipment costs, and tuition and related trainee fees. "- See more at: http://grants.nih.gov/grants/guide/rfa-files/RFA-ES-14-008.html#sthash.zC797dqG.dpuf

24. Question: For the ECWTP, what is the general cost per contact hour for training as we are new to this program, we want to make sure our training plan and associated costs are consistent with existing training.

NIEHS Response: For the all of our programs, generally cost per contact hour is an average of amount awarded divided by the number of contact hours of training. It is usually a gliding scale that ranges from $19 per contact hour and up. Depending on your geographic location, cost of living may dictate a higher cost per contact hour. You should look make sure your training goals, plans and budget are realistic, reasonable, and allocable.

25. Question: We had a question for the DOE FOA UH4 application regarding the 8% cap on F&A. Does that cap apply to subsequent training we might perform after assessing the DOE facility? The training would not be paid for with these funds. Also would it apply to our subs?

NIEHS Response: No F&A Rate in excess of the 8% will be allowed for Program Income use for this program. The rate specified in the RFA will only be considered and any applications that come in with a rate higher than the 8% will be considered non-responsive to the RFA guidelines.

26. Question: There was a function on the 424 template which allowed the applicant organization to extract the sub-award budget template in order for the collaborating institution(s) to complete the budget(s) and obtain approval from their research office; after which the file would be returned to the applicant organization and attached as a pdf. Does this apply to the current application?

NIEHS Response: Separate Subawardee budgets are required for each of the budget years; however, the Applicant will need to consult with Grants.gov Representative regarding the format and how the subawardee's are to add their data. This is not a Grants Management function.

27. Question: We are partnering with external agencies on this grant to enhance both the services provided as well as the geographic reach of the project. Our budget, as it is currently structured, provides a flat rate consortium fee to these partners. Do we need to complete a budget template and justification for each of these partners?

NIEHS Response: Any agency being considered as a "Consortium" or "Subcontractor" must have a detailed budget and justification attached. If they are a Consortium/Subcontractor within a Consortium/Subcontractor then those budgets have to be combined. This was an earlier ASSIST question and also discussed at the webinar. However, if their "partners" are performing in a minor or non-significant capacity, they may want to consider them as "Consultants". No detailed budgets are required for Consultants.

28. Question: In reading the response to Budget question 18, I find two phrases that appear to contradict each other. In the fourth paragraph of the response, the first sentence tells us to subtract the indirects of any component "not led" by the applicant. In the last sentence of this paragraph, it directs us to subtract indirects from "components led by the applicant". Are these two sentences saying the same thing? I'd appreciate a clarification.
For example: We are the lead for our DOE application and have a current subaward that is receiving a total of $54,000 ($50,000 in direct costs, $4,000 in indirects). In calculating the direct cost limit to ensure that we are not requesting more than 10% I believe I take the total direct costs and subtracts the $4,000. We then do the same in the proposed budget for a comparison. Is this correct?

NIEHS Response: You must use the same budget forms for consortium that you use for the main grant budget. In assist when you are entering your consortium it should ask you if there is a budget and it should import the budget pages and enter the consortium name at the top. You will need to do all years for them the same as the main grant budget.

29. Question: Do current awardees need approval for HDTP and HWWT components budgets if we are proposing more than 10% increase of our current award?

NIEHS Response: There is no limit for increase of funds requested under FOA - RFA-ES-14-008 for the HWWT, HDTP or ECWTP for current grantees. The only provision that we have included in the FOA is for new grantees to limit their applications to $700,000.

GENERAL:

1. Question: Would NIEHS consider funding a local or statewide program to train first responders in our state only in decontamination and first responder training activities under Hazardous Waste Program)?

NIEHS Response: No. We fund multi-state programs or programs over large national workforce sectors.

2. Question: For multi-grantee activities, how should we structure our budgets and how do we determine if a partner should be a consortium member or just a consultant?

NIEHS Responses: In reference to the consortium or consultants, it is up to you to decide whether they are consortium or consultants depending on their level of involvement in the project/grant.

3. Question: For letters of support, should a letter support only one program component (i.e., HWWT) or is a letter on behalf of both okay if we work with some groups to do both HWWT and HDPT training? We're hoping the same groups don't have to write two letters. Would it be okay for them to write one in support of both, then we include copies in the attachments for each proposal component?

NIEHS Response: Only one letter is necessary per group submitting a letter of support. You can reference the letter in each program component separately for clarity.

4. Question: The RFA states:…*eRA Commons requires organizations to identify at least one Signing Official (SO) and at least one Program Director/Principal Investigator (PD/PI) account in order to submit an application.* We will identify these two individuals but do we also need to have two eRA accounts?

NIEHS Response: The institution must have one account. The signing official and the PI have accounts under the institutional account.

5. Question: For the ASSIST Application under the Overall Component, does the 12-page limit include subsections Program Summary/Abstract and Program Narrative in Related Other Project Information Section?

NIEHS Response: The 12 page limit in the Overall Section pertains to the Research Strategy and does not include the Program Summary/Abstract, Program Narrative, or Specific Aims.

6. Question: Is the cover letter attachment required under R&R Cover Page? The SF 424 (R&R) Guide encourages the submission of the cover letter but its purpose does not seem applicable to this FOA.

NIEHS Response: A cover letter is not required.

7. Question: The FOA instructions basically ask for the same information in Related Other Information -Program Summary/Abstract and Program Narrative subsections as in Research Plan— Specific Aims and Research Strategy. Please clarify the differences between these two sections.

NIEHS Response: The Program Summary/Abstract and Program Narrative is a standard section of the NIH applications. The Abstract is a short summary of the project, generally a paragraph or two in length. The Project Narrative is generally 2-3 sentences. These sections are truncated descriptions of the Specific Aims and Research Strategy and are available to the public. The Research Plan includes a more complete description of the project and is not available to the public.

8. Question: If we are to submit these four subsections as separate attachments as indicated in the on- line form in ASSIST, what are the page limits for each subsection?

NIEHS Response: Follow the instructions in ASSIST. The Abstract and Narrative is limited to 1 page. The Specific Aims is limited to 1 page, and the Research Strategy is restricted to 12 pages.

9. Question: Under tab—Related Other Project Information, are the following attachments required under the Overall Component since they are also specified under the HWWT and ECWTP components? These attachments are un-asterisked items in the ASSIST on-line forms.

Biblio/Reference Cited

NIEHS Response: This section is required if you cite references, but not required if you don't cite references.

Facilities and Resources

NIEHS Response: This section is a standard section in NIH applications used to describe the facilities and resources available to support your project. Follow instructions in ASSIST on where you are able to upload this document. There is no requirement that it be placed in the Overall component, but that might be where it logically fits.

Equipment

NIEHS Response: Like the Facilities and Resources Section, the equipment section is used to describe equipment available to support your project. Again, follow any instructions in ASSIST on where you are able to upload this document. There is no requirement that it be placed in the Overall component, but that might be where it logically fits.

10. Question: Under tab Research Plan, are the following attachments required under the Overall Component, since these attachments are also included in the HWWT and ECWTP Components?

Consortium/Contract Arrangement?

NIEHS Response: This attachment is required to be somewhere in your application. Place it where it logically fits. If there are separate arrangements for different components, then you may upload them where appropriate.

Letter of Support?

NIEHS Response: These are generally placed in the Overall unless they pertain to a particular program component.

Is there a page limit on letter of support?

NIEHS Response: Letters of Support are generally short 1-page documents, but there is no page limit. Letters of Support should not include information which belongs in the Research Plan and should not be used to bypass page limits in the Research Plan.

11. Question: If appendices that are included in the Overall Component are the same for the specific components, should they be attached only once in the Overall Component?

NIEHS Response: Appendices are attached to the application. It isn't necessary to duplicate appendices for additional components. Clearly label Appendices as to their content and any component to which they relate.

12. Question: Besides curriculum outlines, are there other types of information that can be included in the appendix, e.g., example of program evaluation forms, results of employer surveys, etc.?

NIEHS Response: Copies of survey instruments (evaluation forms) are reasonable items to include as Appendices. Data or results from these forms should be summarized in the Research Plan and not placed in the Appendix. Keep in mind that reviewers often skip Appendices if they are numerous and/or large.

13. Question: ASSIST Application: HWWT Component -Please clarify the following statements on page 22 of the FOA under Related Senior/Key Person Profile: "…When a Senior/Key person is listed in multiple components, the Biographic Sketch can be included in any one component." Does this statement mean that for key persons involved in multiple components, their Bio Sketches should be listed once, in any one of the components proposed?

NIEHS Response: Yes. Biographic Sketches will be aggregated by ASSIST from which ever component they are uploaded and duplicates will be eliminated.

14. Question: Which Higher Education Institutions or Nonprofit organizations have been awarded this grant in the past?

NIEHS Response: Please go to the Who we Fund page for a list of our current 20 awardees at http://www.niehs.nih.gov/careers/hazmat/programs/awardees/index.cfm. In addition, this is a reminder that for profit companies cannot apply for this cooperative agreement FOA. Please refer to the FOA under Section III. Eligibility Information for more information.

15. Question: What are the odds of an applicant securing this grant?

NIEHS Response: As stated in the FOA, we encourage new applicants to apply and during our last round in 2009/2010, we funded 3 new cooperative agreements - **Nova Southeastern University**, **University of Texas Health Sciences Center at Houston**, **and** **Utility Workers of America, AFL-CIO**. The NIEHS will use these criteria in making funding decisions for a U45 cooperative agreement application: technical and scientific merit of the application, programmatic needs, and availability of funds. Please remember that applications that are incomplete and/or nonresponsive will not be reviewed. Lastly, since we don't know how many applications we will receive, it is impossible to determine the odds of any application being successful.

16. Question: I wanted to verify that the Research Strategy page limit on the DOE RFA is 30 pages, while on the three components of the EPA RFA, we are limited to 12 pages each. Could you please confirm?

NIEHS Response: You are correct, however for the Hazardous Material FOA -RFA-ES-14-008, you also have an additional 12 pages for the Overall Component. In this area, you should include the following as listed in the RFA- As opposed to a generic description of the Center components, the Project Summary should provide an overall indication of what the Center proposes. For example, the summary should state the application's broad, long-term objectives and specific aims for worker health and safety training and should be a preview to reviewers as to program scope and content. As such, it is essential that it capture the character of the proposed training program. It should describe the proposed hazardous material and waste worker populations targeted for training including: size, types of work, and geographic locations. It should project the number of workers anticipated to be trained.

17. Question: According to the table on page 19 of the RFA the page limits are 12 for Overall and 12 each for the components. What exactly is included in Overall?

NIEHS Response: Please follow the directions in the FOA under Overall on page 19. What you must do in this section is to provide an overview of the entire application and explain how the components work together.

18. Question: Are all of the items defined on pages 24 to 26 to be addressed in the 12 pages of each individual component? These items are Background and Significance, Progress Report/Compliance with Terms of Prior Awards, Administration, Staff, and Advisory Board, Target Population, Training Program, and Quality Control and Evaluation Plan. This seems like a lot of information to put in 12 pages.

NIEHS Response: For each component (HWWT, ECWT, and HDTP) you must include responses that are **specific to each program component because the target populations will have differences that you should specify** for all of these items- Background and Significance, Progress Report/Compliance with Terms of Prior Awards, Administration, Staff, and Advisory Board, Target Population, Training Program, and Quality Control and Evaluation Plan. This is no different than what you have done in the last round of competition.

19. Question: On page 21 of the RFA the applicant is directed to include biographical sketches of key personnel in the Overall section. This appears to be the PI, Business Official and the Project Lead. Are any other personnel bios required in this section? Are bios for key personnel from consultants required in this section?

NIEHS Response: This seems reasonable. If you feel that bios from key personnel from consultants are salient and important to show for the entire application, you should list them there.

20. Question: On page 24 of the RFA, under Administration, Staff, and Advisory Board, the applicant is directed to provide a biographical sketch for each member of the faculty or staff. Is this different from the key personnel bios required in the Overall section? Do we need to include a bio for each instructor who will conduct training under the program?

NIEHS Response: Applicants should follow PHS 398 instructions for the biographical sketches for all key personnel. Yes, biographical sketches should be provided for all senior/key personnel and other significant contributors, including trainers/instructors, consultants, etc. For this program, trainers and certain consultants play a key role in your training program therefore we have deemed these individuals to be other significant contributors as listed in PHS 398 application instructions.

21. Question: Since the proposal is for a training program, humans are involved, yet they are not research subjects. Do applicants need to indicate yes that human subjects are involved (page 23) and then complete the section on Protection of Human Subjects (page I-114 of the PHS SF 424 application guide)?

NIEHS Response: No, human subjects should not be marked.

22. Question: The research strategy portion of the Overall is clearly designed for academic/scientific research. This is not the case for a training program. Do applicants need to complete the Research Strategy as described in the PHS SF 424 application guide pages I112 to113 or are there other criteria for a training program?

NIEHS Response: *You should follow the instructions in the FOA under Overall and Research Strategy as we are different than a Research program, so we have tailored our FOA to address training.*

23. Question: Under the DOE Program, can we offer training to community members that are not workers at DOE sites?

NIEHS Response: The major focus of the DOE Program is to target workers at DOE sites; however, training of community members such as mutual aid workers who may have to respond to an incident on site or bordering community members such as Native American tribal members is ok. We have detailed under our Ongoing and New Initiatives areas that you should review when thinking about expanding training under our programs.

24. Question: What is the font and spacing limitations for the grant?

NIEHS Response: As per SF-424 instructions at http://grants.nih.gov/grants/funding/424/SF424_RR_Guide_General_VerC.pdf, please see page I-22 for Font, Size and Spacing for your grant submission. It states…Prepare the application using Arial, Helvetica, Palatino Linotype, or Georgia typeface in black font color. Font size in each final PDF document must be at least 11 points (or larger). Since some PDF converters may reduce font sizes, it is important to confirm that type density in each final PDF document, including both characters and spaces, is no more than 15 characters+spaces per linear inch and no more than six lines per vertical inch. Final PDF documents should be formatted to be no larger than standard paper size (8 ½" x 11). The final PDF document should have at least one – half inch margins (top, bottom, left, and right) for all pages.

25. Question: How do we label our program components in Assist for the Hazardous Waste RFA-ES-14-008?

NIEHS Response: As indicated in the RFA-ES-14-008, each program component should be labeled as follows:

Component Types Available/Names in ASSIST	**Full Name of Program**
Overall	Overall Component
HWWTP	Hazardous Waste Worker Training Program
ECWTP	Environmental Careers Worker Training Program
HDPTP	Hazmat Disaster Preparedness Training Program

26. Question: The following documents are typically required in NIH applications, but they do not have an asterisk in the ASSIST system to indicate a requirement: Facilities & Resources, References Cited, Equipment, and Current/Pending Support. Are these attachments required for this application?

NIEHS Response: Facilities, Resources, References, current/pending support, these are all required per SF424 per my review.

27. Question: Project Narrative – In the solicitation, it says that the Project Narrative is not required, but there is an asterisk in the actual application. What should be uploaded here?

NIEHS Response: Under FOA RFA-ES-14-008 for the project narrative, it is required for the Overall only.

28. Question: We cannot access the 'Cover Page Supplement' tab.

NIEHS Response: Cover page info is required for all but you must only complete the information requested in each program component as directed in the FOA

29. Question: We cannot access the 'Research Plan' tab.

NIEHS Response: You should be able to access the tabs, if not you need to fill out a ERA HELP DESK REQUEST for assistance. If you applying FOA RFA-ES-14-009 for the DOE let me know as there are some different instructions.

30. Question: In the General section of the October 7 FAQs, question #5 relates to the components of the Overall section. Does the NIEHS Response also apply to the HWWTP and HDPTP Components? If so, does the NIEHS Response to question #8 also apply to the HWWWTP and HDPTP Components?

NIEHS Response: In regard to Question 5 on General, the answer is yes this applies to each program component as indicated in the SF 424 instructions/ASSIST. The 12 page limit in the Overall Section pertains to the Research Strategy and does not include the Program Summary/Abstract, Program Narrative, or Specific Aims.

For Question 8 on General, the answer is yes also. Follow the instructions in ASSIST. The Abstract and Narrative is limited to 1 page. The Specific Aims is limited to 1 page, and the Research Strategy is restricted to 12 pages for each program component.

31. Question: Under the HWWTP Component Type in the Research Plan tab, question 1 under Research Plan Attachments addresses Introduction to Application. Are prior grantees considered a Resubmission and if so, what do we need to attach in this section. Is there a page limitation?

NIEHS Response: For all current awardees, you are a renewal application. In the FOA, we do not ask for an introduction to application. Please follow FOA first.

32. Question: Under the HWWTP Component Type in the Research Plan tab, question 2 under Research Plan Attachments addresses Specific Aims. Is Specific Aims part of the 12 page limitation or is it submitted separately as its own attachment? If we put it as part of the #3 Research Strategy, does it need to also be entered at #2 Specific Aims? If #2 and #3 are combined as part of the 12 pages, does Specific Aims count as 1 pages regardless of the amount of text placed on this pages, e.g., a half page?

NIEHS Response: See my responses above regarding page limits for specific aims. Only the Research Strategy is limited to 12 pages.

33. Question: I am assisting with a renewal application in response to RFA-ES-14-008, Hazardous Materials Worker Health & Safety Training (U45). Would you please advise whether or not for a renewal application, should we upload a Progress Report Publications list, which is attachment #4 on the PHS 398 Research Plan, for the component that is being renewed?

NIEHS Response: As stated in our FOA under each program component including HWWT, HDTP, and ECWTP, you are directed to provide under the Research Strategy under (Section b: Progress Report/Compliance with Terms of Prior Awards) your progress report for your renewal/competing application. In addition, providing a progress report publication list would provide support to your collaboration efforts and reflect achievement of program goals and objectives of prior award, so please submit this as an attachment to the appropriate appendix for the program component. By submitting it as an appendix item, it will not count against your 12 pages for the narrative for your program component. Please remember to state that you are including this publication list as an appendix in the progress report section.
b. Progress Report/Compliance with Terms of Prior Award(s).

- Applicants who are presently being funded under this program should provide a progress report of their activities. This should include description of efforts to meet established terms and conditions, attainment of program goals and objectives of prior awards, ability to manage and expend funds in a timely manner in prior budget periods and a summary of collaborative efforts with other awardees and NIEHS program staff.

REVIEW:

1. Question: How do I know NIH has received my application?

NIEHS Response: Principal Investigators should check their eCommons Account for their applications. This is the last step in the submission process. If you do not see your application within 2 days of submitting through Grants.gov, NIH has not received it. For assistance in the submission process, please contact the eRA HelpDesk (see http://grants.nih.gov/grants/ElectronicReceipt/support.htm).

2. Question: Can changes be made to my application after it has been submitted? Can I submit additional or corrected material?

NIEHS Response: The applications are assumed to be complete when submitted. No changes are allowed to the applications, and supplemental material is limited to updates in the status of publications or grant funding. An exception is for system-generated problems with legibility. If unforeseen circumstances should lead to a change in key personnel, please contact Sally.Tilotta@nih.gov.

3. Question: Who will review the grant applications? Is there an NIH standing study section?

NIEHS Response: An ad hoc committee of reviewers will be recruited to assess the merit of both the Hazardous Materials Worker Safety Training and the DOE Nuclear Complex Safety Training applications. There is no standing study section for this review. The committee members will have expertise in appropriate areas reflecting the themes of the proposed projects, including adult education and training; hazardous materials and radiation safety; culturally sensitive life skills training; federal and state regulations governing the health and safety of hazardous materials workers; and disaster- related or first-responder field experience.

4. Question: What is the timeline and how will I know the review stage my application is in?

NIEHS Response: Principal Investigators should check their eCommons account for communications regarding the review. Much of the review process is electronic, and as the applications proceed through it, information is automatically posted in eCommons.

5. Question: When will I know the results from the review committee?

NIEHS Response: Scores are posted in eCommons within three business days of the review meeting. A written report of the reviewers' comments (Summary Statement) is generally available in eCommons within 30 days after the meeting.

6. Question: If we submit for two components - for ex: HWWTP and HDPTP - will each component application be reviewed by the same set of reviewers, or will there be different reviewers for each component.

And - if there are different sets of reviewers, will the Overall component be reviewed and available to the reviewers of each of the other components?

I'm concerned that if I put information in the Overall component and not the others that the reviewers will see it.

NIEHS Response: Pretty generally the same reviewers are assigned to all components of the applications. That's not always true with multi component applications, but there is so much overlap with these worker training applications that it makes sense to assign them to all components.

The entire application is available to all reviewers who are not in conflict with the application, as are the comments from the fellow reviewers.

It will be read by all reviewers, but reviewers will need to make sense of it. Make your choice of where you put something on the basis of where it makes sense to put it.

7. Question: On question 6 in the Review section, it appears that it's possible that the primary reviewers that have these two components might not be exactly the same people. Although unlikely, I would like to ask for a clarification especially since this is the first time our grant has multiple components if we submit for 2 components as many are. Will the reviewers who review the HWWT component also review the Overall component? Will the reviewers who review the HDP component also review the Overall component? As a statement, I hope that is the case since with tight page restrictions, many elements will be in the overall and not the HWWT or HDP component.

NIEHS Response: All reviewers will be assigned to the overall section along with the subsections to which they are assigned. They will be encouraged to read the entire application even if they are not assigned to a particular subsection.

8. Question: Will the reviewers be aware of the 12 page limitation of the HWWT and HDP components?

NIEHS Response: Yes, the reviewers will be aware. They are required to read the FOA as this is the document that they must base their review on as it contains the review criteria and instructions for applicants.

9. Question: The 424 directions state that under the Research plan we should upload an attachment to explain our Consortium arrangements. We have 6 organizations that perform very similar tasks in recruiting workers for training, recruiting worker trainers, setting up field training and ensuring organizational cooperation. Can we describe these tasks (in more detail) in general and attach an example of a Consortium agreement or do we need to include all Consortium agreements with a description for each organization?

NIEHS Response: I did not see that the Research Plan for Overall and the Program components required for consortium/contractual agreements. It seems that the other project information form should describe the consortium/contractual agreements and would be an attachment and not count toward the 12 page limit. According to the SF 424 instructions on page I-56 and 57, I found the following:

Project/Performance Site Primary Location

Generally, the Primary Location should be that of the applicant organization or identified as off-site in accordance with the conditions of the applicant organization's negotiated Facilities and Administrative (F&A) agreement. This information must agree with the F&A information on the Cover Page Supplement Form of the application. If there is more than one performance site, including any Department of Veterans Affairs (VA) facilities and foreign sites, list them in the fields provided for Location 1 - # below. Applicants should also provide an explanation of resources available from each Project/Performance Site, the Facilities and Resources attachment of the Other Project Information form, and describe any consortium/contractual arrangements in the Consortium/Contractual Arrangements attachment of the PHS 398 Research Plan.

10. Question: I'm wondering about where to include the list of personnel. The RFA asks that the Administration, Staff, Advisory Board section include "list technical support staff members". What is considered a technical support staff member? Do we need to include in the narrative a listing of all staff? If not, where do we list all staff? Does that go in the 398 All Personnel Form and get attached in ASSIST? Does it go in the budget justification?

NIEHS Response: Technical Support Staff are any individuals that provide technical support to your grant. They could include consultants, advisory board members, etc. We suggest you put the key staff in the narrative as indicated. According to Scientific Review, if you don't want them identified as key personnel, the only place they can think to put them is under the budget justification. Previous FOA applications coming in through the ASSIST system have added them after all the budget summaries either in the overall component or the sub components.