**FY 2024 NGDISM NOFO Questions and Answers**

1. In section “Additional Priorities and Selection Considerations” subsections “Workforce Development, Job Quality, and Wealth Creation” and “Equity,” the NOFO provides a set of assessment metrics to evaluate the community benefits of the proposed project. What level of detail is PHMSA anticipating for these two sections?

   **A succinct statement or brief explanation addressing how the proposed project will support the priorities is sufficient.**

2. Indirect and MTDC Calculations. The applicant has no subrecipients for this grant award. a. Can the de minimis rate be applied to vendors and construction contractors? Is there a maximum amount?
   **Costs incurred by vendors and contractors need to be directly allocated and should not be included in the MTDC rate.**

3. Can the de minimis rate be applied to materials and supplies (pipe/fittings)?
   **Yes. The 2024 Uniform Guidance update from the Office of Management and Budget (OMB) increased the threshold for unused supplies from $5,000 to $10,000. This change applies to the aggregate value of all supply types, not just similar items. The update also defines "unused supplies" as supplies that are new and have not been used or opened. This change is effective on October 1, 2024.**

4. What budget items does PHMSA consider as part of the MTDC?
   **PHMSA adheres to the definition of MTDC as outlined in 2 CFR 200.68**

| Costs that are typically allowable for MTDC calculations | Costs that are typically excluded from MTDC calculations |
|---|---|
| Salaries and wages for project personnel (including fringe benefits). | Capital expenditures (such as equipment and facilities) |
| Materials and supplies necessary for the project | Tuition remission |
| Travel directly related to the project | Rental costs of off-site facilities |
| Equipment costs necessary for the project, excluding capital expenditures | Participant support costs |
| Consultant services | Subawards in excess of $25,000 |
| Subawards under $25,000 | Alcoholic beverages |
| Publication costs | Insurance and indemnification |
| Communication costs | Interest |
| Computer services | Taxes |
| Administrative support | Legal fees |

5. What differences are there for subrecipients for MTDC calculations?
   **It is unlikely that NGDISM projects will have subrecipients. A subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program.**

6. When do you expect to announce NGDISM grant awards?
   **The *anticipated* timeframe is October 2024.**

7. We are assisting two communities and I do not see where grant funds would be applied to reimbursements; is this allowed if they were based on safety improvements?
   **PHMSA does not provide retroactive funding for projects that were already completed.**

8. I just saw the note in the NOFO that the DIMP must be no older than two years. If an entity updates their DIMP every five years, and the current DIMP is dated December 2021. How will this affect the project eligibility and review?
   **The most recent DIMP will be accepted, even if it is beyond the 2-year date.**

9. Our current DIMP does not reflect the most recent damage and leakage from the pipeline to be replaced (February 2024), would it be beneficial for us to go ahead and update it before submitting our application?
   **The NGDISM Grant Program does not provide guidance on when to update your DIMP. If there are proposed or planned updates that capture more recent information, that should be explained in the application or as an addendum to the DIMP.**

10. The NOFO also states a de minimis rate of 10%, while the webinars strictly stated a new rate of 15% was to be used.
    **The current rate is 10%. However, the updated federal grant regulations will increase the percentage to 15% for awards executed on or after October 1, 2024. Applicants may claim the 15% in their budgets since FY 2024 awards will be executed after October 1, 2024.**

11. With the federal holiday coming up, I was asked to confirm the submission date for 2024's NGDISM Grant Program is still no later than June 20th?
    **Yes, the deadline is June 20, 2024.**

12. Are jobs that were added before applying for the FY2024 NGDISM qualify for the line item of "Good Paying Jobs."
    **No. Only jobs added as a result of NGDISM funding, direct or indirect, should be included.**

**13.** I am reaching out for some assistance as there are requirements in the grant checklist that I am unfamiliar with. By any chance do you have a sample of the statements below that I can use as reference to obtain ours?

- Statement of Authority and Pipeline Infrastructure safety and Modernization Capabilities
- Statement certifying compliance with Executive Order 13985
- Statement certifying compliance with Domestic Preference/Buy America

**Applicant Eligibility and Statement of Authority and Pipeline Infrastructure Safety and Modernization Capabilities.** A short statement by the applicant verifying/affirming they are a municipal- or community-owned gas distribution utility and have the legal authority and capability to perform pipeline infrastructure repairs, rehabilitation, or replacement, in accordance with 49 CFR § 192, and to purchase equipment.

**Statement Certifying Compliance with Equity Requirement.** Applicants must include a statement certifying they are currently complying (or will comply) with Executive Order (EO) 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. Equity means the consistent and systematically fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous persons, Asian Americans and Pacific Islanders; other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

**Domestic Preference/Buy America.** Applicants must include a statement certifying they will comply with Domestic Preference/Buy America and, if applicable, include an assessment of materials, products, or manufactured products that would require an exception or waiver of the Buy America provisions.

14. Could you kindly clarify if we need to submit all the Standard Forms on the checklist or only what our project falls under.
**If there is a construction component to the application, the SF-424C should be used instead of the SF-424A.**

**If the application is seeking funding for equipment only project proposals, the applicant should use the SF-424A.**

- **SF-424 Application for Federal Assistance**
- **SF-424A (Equipment Only) OR SF-424C (Construction Projects)**
- **SF-424D Assurances for Construction Programs**
- **DOT/Title VI Non-Discrimination Assurances**
- **Grants.gov Lobbying Form - Certification Regarding Lobbying**

15. For the FY24 PHMSA NGDISM grant program, it is not completely clear to us in the NOFO if a city gate valve replacement qualifies as an 'eligible project'. This is a worn out & outdated original 1950 city gate.
    **City gate stations are eligible projects, but like all the projects it must be justified by the DIMP and GDAR (if applicable). City Gate Stations are a critical piece of infrastructure and should be addressed in the DIMP when the city gate poses a threat to the system. If the DIMP does not mention the City Gate (or its components) as a threat to system integrity (leaking, operational issues, etc.), it may make the project less competitive.**

16. Must the engineer that helps compile information for the grant application be procured prior to assisting?
    **Entities should follow their hiring and procurement policies when employing staff or procuring contractors.**

17. If an engineer assists with pre award activities, can they also be procured to assist with post award activities if the application is awarded?
    **Entities should follow their hiring and procurement policies when employing staff or procuring contractors. This applies to pre- and post-award procurement.**

18. Are pre-award costs eligible to be paid through the grant award?
    **If approved by PHMSA in writing, pre-award costs are reimbursable expenses once the grant agreement is executed.**