

EPN Office Hours – ASAP Drawdown & Contract Termination Guidance

May 2, 2025





ASAP Drawdowns

How to Stay in Compliance

- ❖ EPA recently reopened ASAP for many grantees
- ❖ Grantees are experiencing contract terminations
- ❖ Key Actions for Grantees:
 - Seek guidance from TRC on strategic drawdowns
 - Execute subrecipient contracts to draw down further
 - Bulk purchasing – follow federal procurement process
 - Payment for discrete work deliverables, completion of short term projects
 - Mobilization costs at start of construction
 - Maintain meticulous records on drawdowns
 - Utilize direct payments of invoices by recipients/ subrecipients to disburse EPA funds within 5 business days of receipt



CONTRACT TERMINATION

How to Think Strategically

- ❖ EPA sending contract terminations to grantees
- ❖ Respond within 30 days to dispute termination
- ❖ Key Actions for Grantees:
 - Submit/update [L4GG FPC Intake Form](#)
 - Draw down from ASAP to recover incurred expenses through date of termination
 - Consult L4GG pro bono attorney and seek guidance
 - Stay in compliance while minimizing expenses
 - Build administrative record of harms to organization
 - Use L4GG demand letter templates (T&C [prior to Oct 2024](#), T&C [after Oct 2024](#)) to:
 - Contest contract termination
 - Pursue all remedies since administrative remedies exhausted
 - Decline closeout until EPA DDO takes final action



QUESTIONS?

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