



## REQUEST FOR PROPOSALS (RFP)

### Federal Compliance Consultant

Released: February 14, 2025

Responses Due: March 17, 2025

**SUMMARY:** This request for proposal (RFP) is to contract with an organization to provide consulting services to support monitoring, compliance, and reporting in accordance with federal requirements on the administration of funding through the Environmental Protection Agency’s (“EPA”) Environmental and Climate Justice Community Change Grants program (“Community Change Grant”).

**DESIGNATED RFP CONTACT:** All correspondence for this RFP should be directed to: Shawn Abdul [sabdul@nhtinc.org](mailto:sabdul@nhtinc.org).

**RFP SUBMISSION INSTRUCTIONS:** Email the entire proposal as a single-document attachment by March 17, 2025, at 11:59 PM Eastern Time to [sabdul@nhtinc.org](mailto:sabdul@nhtinc.org). The proposal must be written in English and submitted by email.

REQUEST FOR PROPOSALS SCHEDULE:	
Release of Request for Proposals	February 14, 2025
Deadline for Submission of Questions	February 21, 2025
Deadline for NHT to Respond to Questions	February 28, 2025
Submission of Proposals (date and time)	March 17, 2025, 11:59 PM
Announcement of Selection	March 24, 2025
Anticipated Contract Start Date	April 7, 2025
Anticipated Contract End Date	December 31, 2027

## I. GENERAL INFORMATION

### A. Purpose

National Housing Trust (“NHT”) is a 501(c)(3) recipient of a \$20.1 million Community Change Grant.<sup>1</sup> The Community Change Grant program provides approximately \$2 billion in Inflation Reduction Act (IRA) funds to benefit disadvantaged communities through projects that reduce pollution, increase community climate resilience, and build community capacity to address environmental and climate justice challenges.

The Community Change Grant awarded to NHT will support the retrofit of 785 homes within affordable multifamily buildings in Washington, D.C., to improve indoor air quality and create more resilient housing.

**We seek a qualified organization to support NHT and six affordable housing providers that will receive subawards (“subrecipients”) to comply with EPA financial and administrative requirements per federal regulations and EPA’s terms and conditions. Subrecipients will use the subawards to undertake construction activities at their properties to improve resiliency and remediate unhealthy building conditions.**

The selected consultant will assist NHT with administrative compliance, monitoring, reporting, and auditing support in accordance with federal requirements. These include but are not limited to the [EPA Community Change Grant’s Programmatic Terms and Conditions](#); [EPA’s General Terms and Conditions](#); the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in [2 CFR Part 200](#); the Federal Funding and Transparency Act (FFATA); and the Davis-Bacon Act, among others.

### B. Available Funding and Timeline

This is a cost reimbursement Agreement. The expected budget for this Agreement is up to \$200,000 available for a term of 2.5 years. Proposers are encouraged to indicate if they expect the cost of implementing the required services to exceed this budget.

### C. Overview of Key Activities and Needs

There are two prongs to NHT’s assistance needs:

- Assist NHT to:

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<sup>1</sup> The Community Change Grant was formally obligated to NHT on December 2<sup>nd</sup>, 2024.

- Comply with its obligations and reporting to the EPA, including applicable provisions of [2 CFR Part 200](#) and the [EPA Subaward Policy for EPA Assistance Agreement Recipients](#), and
- Monitor the compliance status of subrecipients; and
- Assist subrecipients in adhering to federal requirements.

NHT and Subrecipients must comply with the following requirements, among others:

- 1. Procurement:** Procurement standards set forth in 2 CFR 200.317 through 2 CFR 200.327; 2 CFR Part 1500; 40 CFR Part 33, and the EPA General Terms and Conditions. This includes ensuring open and free competition in purchasing in compliance with competition thresholds, according to 2 CFR 200.320. Guidance on complying with these requirements can be found in the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).
- 2. Davis-Bacon and Related Acts (DBRA):** The Davis-Bacon and Related Acts (42 U.S.C. §§ 3141-3144) sets labor standards, including prevailing wages and fringe benefits, and applies to contractors and subcontractors performing on federally funded or assisted contracts in excess of \$2,000 for the construction, alteration, or repair of public buildings or public works. Guidance can be found in [Davis Bacon and Related Acts](#).
- 3. Reporting Requirements:** Project performance reporting requirements as set forth in 2 CFR 200.329 and the EPA Community Change Grant’s programmatic terms and conditions entitled “Programmatic Reporting and Notification”. This includes submitting quarterly reports to NHT on performance, progress, quality assurance, and financial information.
- 4. Nondiscrimination Laws and Social Policies:** Requirements in Title VI of the Civil Rights Act of 1964 and other Federal statutes and regulations prohibiting discrimination in Federal financial assistance programs, as applicable. Social policies include the Utilization of Disadvantaged Business Enterprises (DBEs) in accordance with EPA regulations at 40 CFR Part 33, “Participation by Disadvantaged Business Enterprises in U.S. EPA Programs,” which sets forth requirements for making [good faith efforts](#) to ensure that DBEs, including Minority Business Enterprises (MBEs) and Women’s Business Enterprises (WBEs), receive a fair share of contracts awarded with funds provided by EPA.
- 5. Financial Records Retention:** In accordance with 2 CFR § 200.334, retain financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to the grant award for a period of three years.

- 6. Compliance Monitoring/Access to Records:** Compliance monitoring requirements, including maintaining a Financial Management System with accurate and complete accounting records that allow for the identification, tracking, and verification of expenses, invoiced items, and funding received in accordance with the requirements of 2 CFR Part 200, Subpart F, Audit Requirements and 2CFR 200.336.
- 7. Financial Management Policies:** These requirements include:

  - a. Reporting Subawards and Executive Compensation under FFATA
  - b. Limitations on individual consultant fees as set forth in 2 CFR 1500.10 and EPA’s General Term and Conditions entitled “Consultant Fee Cap.”
  - c. EPA’s prohibition on paying management fees as set forth in EPA’s General Terms and Conditions entitled “Management Fees.”
  - d. Other statutes, regulations, and Executive Orders that may apply to subawards are described in [Information on Requirements that Pass-Through Entities must “Flow Down” to Subrecipients.](#)
- 8. Suspension and Debarment:** Subpart C of 2 C.F.R. Part 180 requires that neither subrecipients nor any of its principles, contractors, or agents have been debarred, suspended, or determined ineligible to participate in federal assistance awards or contracts.
- 9. Acknowledgement Requirements for Grants:** The requirement that subrecipients acknowledge funding support from the EPA in any documents or publications developed for public distribution supported by the grant and provide signage at applicable properties publicizing that projects under this grant are funded by the EPA and the Inflation Reduction Act.

## II. SCOPE OF SERVICES

The selected consultant will provide NHT with the following services:

**TASK 1. PROJECT MANAGEMENT AND WORKPLAN.** The consultant will work with NHT to review and understand the Community Change Grant and related federal compliance requirements and develop a summary work plan and timeline for implementing the services below and other tasks as needed. The work plan will include proposed dates for achieving the Agreement's tasks and a description of the process for regularly communicating progress toward completing the tasks to appropriate NHT staff.

**TASK 2. FEDERAL COMPLIANCE TRAINING SUPPORT.** The consultant will design and implement a strategy for training NHT, contractors, and subrecipients on federal reporting and compliance requirements. Training support may include but is not limited to:

- Identification of administrative compliance monitoring and reporting requirements;
- Developing a project implementation and compliance guide specifically for subrecipients to provide clear information on compliance requirements, including developing tools and resources, such as checklists, templates, and software recommendations, to facilitate efficient compliance management; and
- Implementing one-on-one training with NHT and subrecipient staff to ensure they fully understand compliance requirements

**TASK 3. PROJECT COMPLIANCE SUPPORT.** The consultant will design and develop a comprehensive compliance monitoring and reporting program to ensure ongoing adherence to compliance requirements, including but not limited to:

- Review all applicable compliance responsibilities in the terms and conditions of subawards and ensure subrecipients provide all necessary compliance information;
- Development of subrecipient monitoring and administration procedures;
- Development of a reporting framework to document NHT and subrecipient compliance efforts and outcomes, ensuring that all necessary records are maintained and easily accessible for EPA audits and reviews; and
- Submittal of reports to federal agencies and entering data as required.

**TASK 4. FINANCIAL MANAGEMENT.** Provide support and guidance to subrecipients on required financial management practices for federal awards, including but not limited to:

- Awareness of Federal award requirements for financial management system;
- Sufficient and effective internal controls;
- Federal payment procedures;
- Allowable costs determinations; and

- Submittal of revisions to budgets and program plan.

**TASK 5. FEDERAL REPORTING.** Provide support and guidance for federal reporting obligations, including but not limited to:

- Reporting on program performance, including all required metrics, data, and budget information, as well as regular program and project reports;
- Closeout reporting; and
- Other reporting requirements as needed.

**TASK 6. REVIEW COMPLIANCE IMPLEMENTATION.** Verify NHT's and subrecipients' compliance with federal compliance obligations, including but not limited to reviewing the following:

- Financial management and performance reports and following up on any deficiencies
- Competitive procurement processes and documentation
- Davis-Bacon Act compliance monitoring, including but not limited to reviewing payrolls and preparing and submitting reports

### III. PROPOSAL REQUIREMENTS

The proposal shall include the following:

**1. Respondent Information:**

- Cover Letter
- Legal Name of Organization
- Primary Contact
- Contact's Title
- Contact's Telephone
- Email Address
- Physical Address (specify headquarters, relevant satellite offices, and geographic areas for each that can be served under the scope of services)
- Web Address (URL)
- Legal Status of Organization
- Select the applicable federal, state, or local government-issued designations that your organization may have:
  - Native American-Owned
  - Minority Business Enterprise
  - Disadvantaged Business Enterprise
  - Women-Owned Business Enterprise
  - Small Business
  - Veteran-Owned Small Business
  - Service-Disabled, Veteran-Owned Small Business
  - SBA Certified Small Disadvantage Business
  - SBA Certified 8(a) Firm
  - SBA Certified HUBZone Firm
  - Other
- Number of W2 Employees
- Organizational History
- Statement confirming whether you know of any actual or apparent conflict of interest arising from this proposed engagement (including any conflicts described in 2 CFR § 200.318(c)).
- List of five clients for whom you have done similar work

**2. Approach.** The Proposer should describe its approach to providing services listed in the Scope of Services. The proposed approach should include, at a minimum:

- The process and specific activities to achieve the stated goals.
- A timeline for the activities.

- Milestones and a detailed list of deliverables tied to activities.
- A budget for each task and a proposed payment schedule tied to project milestones or deliverables.

**3. Experience and Qualifications.** The Proposer should document the project team's qualifications to perform the tasks described in the Scope of Services. Specifically, the Proposer should:

- Describe recently completed work as it relates to the Scope of Services.
- Describe experience with and knowledge of key federal compliance requirements, e.g. Davis Bacon Act, competitive procurement, financial management.
- Identify and list all Bidder staff and Subcontractors (all team members) who will be committed to the tasks and describe their roles.
- Provide a resume for all team members listed, including job classification and description, relevant experience, education, academic degrees, and professional licenses.
- Provide a summary of the project team's experience managing contracts/projects similar to the Agreement resulting from this RFP.
- Describe the project team's experience providing monitoring and compliance in each of the following areas of federal requirements:
  - Identification of applicable administrative reporting compliance requirements for federally funded programs
  - Provide review and guidance of subrecipient tasks and deliverables related to federal compliance requirements
  - Develop monitoring and administration procedures
  - Submission of federally required reports
- Describe the project team's experience in the following areas of training:
  - Developing a training plan
  - Designing training materials on federal reporting and compliance requirements
  - Present and host training sessions
  - **Client References.** Provide two client references for the Contractor and at least one for each subcontractor. References must be for work completed within the past three years and relevant to the scope of services described in this RFP.



4. **Previous Work Products.** Each Contractor and subcontractor shall submit at least one example work product demonstrating experience in potential work assignments described in this RFP.
5. **Pricing.** Include expected total fees by task with the minimum average hourly rates for any key staff. Proposed pricing should include other costs necessary to support the scope of services. The scope is intended to be over a 2.5-year contract.
6. **Insurance.** Describe the levels of coverage for liability insurance and cyber insurance your organization carries.
7. **Debarment or Suspension.** Confirm that neither your organization nor any individual employee has been debarred or suspended from or ineligible for participation in Federal assistance programs.

## IV. SELECTION CRITERIA AND SCORING

NHT will evaluate complete responses submitted before the deadline based on the following criteria.

### A. Qualifications (25 pts)

The respondent has the qualifications necessary to complete the services successfully based on:

- Demonstrated expertise, including evidence of robust knowledge of the federal compliance requirements detailed in this RFP. (10 pts)
- Prior experience working on similar projects with and a record of past performance evidenced by the quality of submitted examples of representative work and references (10 pts)
- Other qualification criteria identified in Proposal Requirements (5 pts)
- Experience working with, or familiarity with, the affordable housing industry is a plus

### B. Approach (30 pts)

The respondent proposes a compelling and sound approach to implementing the required services based on:

- Demonstrated understanding of project objectives and desired results (5 pts)
- Demonstrated ability to understand and discuss technical issues clearly and concisely with non-technical stakeholders in a responsive manner (5 pts)
- Description of project activities and milestones or deliverables associated with the scope of work (10 pts)
- Demonstrated ability to successfully execute the proposed approach in the required timeframe (10 pts)

### C. Qualifications of proposed staff (20 pts)

The proposed project team has the skills and expertise to successfully execute the scope of work based on:

- Relevant work experience (10 pts)
- Years of experience conducting similar work (5 pts)
- Appropriate qualifications and credentials (5 pts)

### D. Reasonableness of costs (25 pts)

The proposed budget is appropriate and reasonable based on:

- Detailed information on the breakdown of costs for various tasks (10 pts)
- Description of how overhead and expenses will be minimized and controlled (10 pts)
- Billing rates are reasonable for the labor categories and work experience, and compensation levels are consistent with EPA's [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements \[Updated November 2022\]](#) (see page 16; "Limitations on consultant compensation"). (5 pts)

## **V. OTHER REQUIREMENTS/NOTICES**

The proposer is responsible for all costs incurred in preparing a proposal responding to this RFP and/or participating in any interview process and will not be reimbursed.

NHT will procure the services per EPA and federal requirements and EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment. NHT reserves the right to (a) reject any or all proposals without explanation, (b) waive technicalities or irregularities, (c) request additional information from any Proposer, (d) withdraw this RFP at any time, (e) make such selection deemed in its best interest (in NHT's sole and exclusive discretion), and/or (f) make multiple or partial awards. The award of the contract(s) will not necessarily be made to the organization offering the lowest price. The issuance of this RFP does not imply that NHT is making an offer to conduct, expand, or terminate business with any Proposer. Your preparation and submission of a response does not commit NHT to award the business to any Proposer even if all the requirements are met.

The Proposer agrees to keep confidential all nonpublic information about NHT and agrees that persons or entities with which the Proposer participates in responding to this RFP will be bound by the same confidentiality obligations. All proposals and other documentation submitted in response to this RFP will not be returned by NHT and will become property of NHT subject to disclosure under the Freedom of Information Act.