

# MBE/WBE Reporting

## *“Measuring the Effectiveness of the Program”*

### Program Comparison

Old MBE/WBE Program	New DBE Program
Recipients must report MBE/WBE accomplishments on EPA Form 5700-52A.	No Change
The following recipients report on an annual basis: <ul style="list-style-type: none"> <li>• Recipients of Continuing Environmental Program Grants under 40 CFR Part 35, Subpart A;</li> <li>• Recipients under 40 CFR Part 35, Subpart B;</li> <li>• General Assistance Program (GAP) grants for tribal governments and intertribal consortia; and</li> <li>• Institutions of higher education, hospitals and other non-profit organizations receiving financial assistance agreements under 40 CFR Part 30.</li> </ul>	No Change
The following recipients report on a quarterly basis: <ul style="list-style-type: none"> <li>• Recipients of financial assistance agreements that capitalize revolving loan funds; and</li> <li>• All other recipients not specified as “annual reporters”.</li> </ul>	<b>Recipients who reported quarterly under the old program, now report on a semi-annual basis.</b>
Self-certified MBEs and WBEs can be counted toward a recipient’s accomplishments.	<b>MBEs and WBEs must be certified in order to be counted toward a recipient’s accomplishments.</b>

#### **What is the Purpose of MBE/WBE Reporting?**

The purpose of MBE/WBE reporting is to monitor the grant recipient’s

- Accomplishments in Utilizing MBEs and WBEs;
- Adherence to the Good Faith Efforts (i.e., outreach to MBEs, WBEs, and other DBEs); and
- Progress in Achieving MBE and WBE Goals.

#### **What are the Grant Recipient’s Responsibilities for MBE/WBE Reporting?**

- Complete & submit EPA Form 5700-52A for each reporting period at a frequency specified in the grant agreement, to the appropriate EPA office and personnel as identified in their financial assistance agreement.
- Submit “negative reports” (e.g., reports where there were no MBEs or WBEs utilized, or no procurement expenditures of any kind were made during the reporting period).

- Collect and retain/document data on MBE, WBE, and Total Procurement expenditures made for the grant project up to the “Total Assistance Agreement Amount” (i.e., the grantee’s total budget).
- Report procurement expenditures from all sources [i.e., the EPA grant recipient, sub-recipients, loan recipients (and the prime contractors of all three entities)].

### **What are the reporting frequencies and due dates?**

#### **Annual Reporters:**

- Recipients of Continuing Environmental Program Grants under 40 CFR Part 35, Subpart A;
- Recipients under 40 CFR Part 35, Subpart B;
- General Assistance Program (GAP) grants for tribal governments and intertribal consortia; and
- Institutions of higher education, hospitals and other non-profit organizations receiving financial assistance agreements under 40 CFR Part 30.
- **Annual Reporters** must submit their completed EPA Form 5700-52A to EPA within 30 days of the end of the annual reporting period (**October 30th**).

#### **Semi-Annual Reporters:**

- Recipients of financial assistance agreements that capitalize revolving loan funds; and
- All other recipients not specified as “annual reporters”.
- **Semiannual Reporters** must submit their completed EPA Form 5700-52A to EPA within 30 days of the end of the semiannual reporting period (**April 30th and October 30th**).

### **What must be considered in counting MBE/WBE participation?**

- MBEs & WBEs must be officially certified as such, in order to claim/report them as MBE/WBE on EPA Form 5700-52A. (See Certification Fact Sheet)
- MBEs and WBEs may not act as Brokers or Passive conduits of funds.
- A MBE or WBE Trucker must serve a “commercially-useful” function.
- The amount counted towards a MBE or WBE Prime Contractor may not exceed 100% of contract value.
- To be claimed 100% MBE or WBE, a Prime Contractor who is MBE or WBE may not sub-award more than 49% of its contract value to non-MBE/WBE.

### **MBE/WBE Reporting Under Revolving Loan Programs**

- EPA financial assistance recipients that capitalize Revolving Loan Programs need only report “Total Procurement Dollars” in the amount of loans equal or up to the capitalization grant amount.
- Entities receiving identified loans must submit their MBE/WBE participation reports/data to the EPA grant recipient (rather than to EPA).
- EPA financial assistance recipients that capitalize Revolving Loan Programs must ensure that they receive procurement reports from revolving loan recipients in time to meet EPA’s MBE/WBE Reporting deadlines.