



CHAPTER SEVEN: *Cross-Cutting Requirements*

Chapter Summary:

Cross-cutting federal authorities are the requirements of other federal laws and Executive Orders that apply to federal financial assistance and activities such as the Brownfields RLF program. Generally, these authorities are expressly applied by the statute authorizing the assistance itself. Frequently, the requirements are not specifically cited in the authorizing statute, but broadly apply by their own terms to a wide range of federal financial assistance programs. In the RLF program, these include environmental laws; social policy authorities such as executive orders on equal employment opportunity in federally assisted programs; and economic authorities such as rules in implementing executive orders on debarment and suspension.

More specific information on cross-cutters can be found in the EPA Guidance: *Cross-Cutting Federal Authorities: A Handbook on Their Application in the Clean Water and Drinking Water State Revolving Fund Programs*. Although, the handbook is tailored to state clean water and drinking water revolving loan fund programs, it provides an example of how cross-cutters are applied to other EPA financial programs. EPA is currently preparing and reviewing more specific information regarding applicability of cross-cutters for the Brownfields RLF program.

Although, EPA retains ultimate responsibility for ensuring that recipients comply with cross-cutting federal authorities, RLF program recipients maintain a direct relationship with the borrowers and subgrantees who must comply with the cross-cutting requirements. Compliance activities are carried out mainly by the recipients, to the extent authorized under each cross-cutter.

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