## EPA Environmental Financial Advisory Board GHGRF Charge

Public Meeting November 17, 2022

# What is EFAB?

EFAB is a Federal Advisory Committee, an independent advisory body chartered under the Federal Advisory Committee Act (FACA) with members representing various constituencies

- All meetings are open to the public
- All materials are available online via EPA's website



# Charge Background & Summary

### Section 60103 of the Inflation Reduction Act of 2022 – Amended the Clean Air Act to create a new program: the Greenhouse Gas Reduction Fund (GHGRF)

 This first-of-its-kind program will provide competitive grants to mobilize financing and leverage private capital for clean energy and climate projects that reduce greenhouse gas emissions – with an emphasis on projects that benefit low-income and disadvantaged communities

#### The GHGRF provides \$27 billion to EPA for expenditure until September 30, 2024. This includes:

- \$7 billion for competitive grants to enable low-income and disadvantaged communities to deploy or benefit from zeroemission technologies, including distributed technologies on residential rooftops;
- Nearly \$12 billion for competitive grants to eligible entities to provide financial and technical assistance to projects that reduce or avoid greenhouse gas emissions; and
- \$8 billion for competitive grants to eligible entities to provide financial and technical assistance to projects that reduce or avoid greenhouse gas emissions in low-income and disadvantaged communities

## EPA launched a coordinated stakeholder engagement strategy to help shape the implementation of the GHGRF and ensure economic and environmental benefits are realized by all Americans.

- Public Listening Sessions November 1 and November 9, 2022; recordings available online
- Request for Information Public comment period open until December 5, 2022
- Solicitation of Expert Input from EFAB
  - EPA presented and EFAB approved a set of formal charge questions on October 19, 2022
  - Final charge deliverable(s) to EPA on December 15, 2022

# Charge Status

EFAB created 3 workgroups for 3 categories of charge questions:

- 1. Objectives
- 2. Program Structure
- 3. Execution, Reporting, & Accountability

Workgroup Progress

- Given the extremely compressed timeline of this charge (2 months vs. 1-2 years), workgroups have drawn on their own expertise and that of their constituent networks, reviewing public comments and other readily available literature
- Materials shared today are in no way meant to be exhaustive; they represent deliberations up to this point
- Workgroups have been working independently
  - Workgroup integration and coordination hasn't happened yet
  - Overlapping themes will be addressed leading up to December 15, 2022

Today – Check in with full EFAB, review workgroup progress to date, and solicit feedback

Upcoming charge schedule

- December 1, 2022 EFAB Public Meeting to check in and review workgroup progress
- December 15, 2022 EFAB Public Meeting to present the final charge deliverable(s) and vote on its approval

## Program Structure Workgroup

**GHGRF Charge – Program Structure** 

## Workgroup Overview

- Eligible Recipients
- Eligible Projects
  - Types of Projects/Sectors/Market Segments
  - Barriers, Gaps to Fill, and Strategies
  - Beneficiaries/Low-Income Communities
- Structure of Funding
  - Design Requirements
  - Compliance and Streamlining

## Eligible Recipients

Charge Question II.a.i: Who could be eligible entities and/or indirect recipients under the GHGRF? What should the thresholds for deployment be – both amount and timing – for GHGRF funding by these entities? Please provide references regarding the total capital deployed by these entities into clean energy and climate projects

Range of state, federally licensed, and non-profit capital deployment vehicles with reach into disadvantaged communities; specific vehicles map to priority projects and unique needs of communities



Note: EFAB is still considering questions around thresholds for deployment and total capital deployed by these entities

## **Eligible Recipients**

Charge Question II.a.ii: What eligible entities and/or indirect recipients would best enable funds to reach disadvantaged communities? What are their challenges and opportunities and how can EPA maximize the use of these channels?

> Capacity to leverage private sector capital to expand the reach of the program will be an important consideration



#### Strategic Allocation of Capital Along Value-Chain of Activities

#### **GHGRF Charge – Program Structure**

## Eligible Projects – Types of Projects/Sectors/Market Segments

Charge Question II.b.i: What types of projects/sectors/market segments could EPA prioritize for funding through the eligible recipients?

To frame what types of projects could be considered, need to understand where the problem is. How can it be solved? Who will benefit? For example, assess the largest sources, sectors, locations of GHG emissions to inform consideration



#### **GHGRF Charge – Program Structure**

## Eligible Projects – Types of Projects/Sectors/Market Segments\*

Charge Question II.b.i: What types of projects/sectors/market segments could EPA prioritize for funding through the eligible recipients?

How can the problem be solved? Considerations may include project size, market gaps, GHG reduction capacity, scalability, community reach and access, etc. List below includes representative examples (not comprehensive)



How can the problem be solved?

## Eligible Projects – Types of Projects/Sectors/Market Segments

Charge Question II.b.i: What types of projects/sectors/market segments could EPA prioritize for funding through the eligible recipients?

> Who will benefit from solving the problem? List below includes representative examples (not comprehensive)

Sector	Use Case (examples)	Beneficiary (examples)
Buildings – Residential	Energy efficiency Community solar/wind Rooftop solar Electrification – cooking/heat	LMI LMI LMI Tribal
Buildings – Commercial	Energy efficiency upgrades HVAC upgrades Renewables	Nursing homes/churches/small business Health centers, small business All the above
Industry	Fleet conversions	LMI communities exposed
Transportation	Charging infrastructure	Rural communities Multi-family housing Tribal

*Charge Question II.b.iii: Researching deal-level economics for various use-cases* 

## Eligible Projects – Barriers, Gaps to Fill, and Strategies

Charge Question II.b.ii.1: What are the barriers to private sector capital?

Charge Question II.b.ii.3: What project-level gaps could the GHGRF fill for each type of project? What form could capital take to fill these gaps? Please provide references that analyze the deal-level economics for the various types of projects, including whether and how these may vary by geography

Barriers to Private Capital (II.b.ii.1)	Gaps GHGRF Could Fill (II.b.ii.3)	Forms of Capital
<ul> <li>Project Level:</li> <li>Underwriting risk (payback period, return on investment, revenue vs. cost)</li> <li>Ability to demonstrate energy savings</li> <li>Technical expertise</li> <li>Fragmentation</li> <li>Lack of track record</li> <li>Quality control</li> <li>Tenor (long-term)</li> <li>Operations &amp; Maintenance</li> <li>Pre-requisites (e.g., repairs)</li> <li>Project development/supply chain</li> <li>Scale (e.g., C-PACE)</li> <li>On-bill financing resistance (PACE)</li> </ul>	<ul> <li>Technical assistance including [cost savings analysis, education, adoption requirements, etc.]</li> <li>Pre-condition assistance including [grants for home repairs enabling weatherization]</li> </ul>	<ul> <li>Clean energy loans – single family, multi-family, commercial</li> <li>Energy efficiency loans</li> <li>Revolving loan funds</li> <li>EV auto loans</li> <li>Unsecured loans</li> <li>Blended finance</li> <li>Equipment and appliance loans (e.g., HVAC, energy efficient appliances)</li> <li>C-PACE loans (Commercial Property Assessed Clean Energy loans)</li> <li>Tariff on-bill repayment loans</li> <li>Pay-for-performance contracting mechanisms</li> </ul>
<ul> <li>Borrower Level:</li> <li>Credit risk</li> <li>Ability to repay</li> <li>Uptake</li> <li>Adoption</li> <li>Split incentives (tenant/owner)</li> </ul>	<ul> <li>Market development assistance including [information campaigns, available incentives, community programs]</li> <li>Funding collaboration development including [local funding campaigns, community wide pools, etc.]</li> </ul>	<ul> <li>Green mortgages</li> <li>Small business loans</li> </ul>
<ul> <li>Capital provider:</li> <li>Balance sheet equity</li> <li>Lack of loan servicing platform</li> <li>Lack of shared services (e.g., IT, insurance)</li> <li>Lack of credit enhancements</li> <li>Lack of climate impact reporting infrastructure</li> </ul>	<ul> <li>Balance sheet equity</li> <li>Credit enhancements: Loan loss reserves, interest rate buy-downs, guarantees</li> <li>Technical assistance</li> </ul>	

## Eligible Projects – Barriers, Gaps to Fill, and Strategies

Charge Question II.b.ii.4: Beyond assembling the capital stack for a deal, what other barriers and constraints exist that could constrict the pipeline of successful projects? What program strategies are needed to respond to these barriers and constraints?

> Barriers, examples, and strategies listed below are representative examples (not comprehensive)

Barrier	Project Examples	Strategies
Uptake – See LBNL study on driving demand for home improvements	Home improvements	Community-level programs
Interest – Commercial building owner	Energy efficiency, renewable energy, HVAC upgrades, C-PACE	Demonstrated interest, commitment or pipeline before funding program established
Prerequisites	<ul> <li>Home needs basic repairs (e.g., new roof) before energy efficiency upgrades would be viable</li> <li>Commercial building needs basic energy efficiency upgrades before solar would be viable</li> </ul>	Coordination with State Energy Offices/SEP
Scale – Aggregate impact	Fleet conversions	Systemic programs, collaboration with government agencies

## Structure of Funding – Design Requirements\*

Charge Question II.c.i: Are there any potential program design requirements that would impact the ability of recipients to use the GHGRF program funds?

Potential Program Design Requirements		
Federal funding requirements		
Financial capacity		
Governance		
Metrics/reporting		
Due diligence		
Grants/debt/equity/credit enhancements		
Collective action systemic change		
Sector expertise		
Technology		

Other requirements to maximize reach (community) and impact (GHG reductions)

## Structure of Funding – Design Requirements

Charge Question II.c.i: How could EPA address these issues through program design?



EPA has an opportunity to create program structures that address barriers and directly support scaled deployment across defined value chains, with emphasis on filling gaps that currently inhibit expansion and benefits to low-income communities

## Structure of Funding – Compliance and Streamlining

Charge Question II.c.i: How could recipients comply with relevant federal requirements?

> EFAB workgroup is reviewing relevant Federal requirements

Charge Question II.c.i: How can EPA streamline the distribution of funds so that applicable federal and state review can be accomplished in a coordinated and efficient manner?

> Evaluating pros and cons of a range of potential options

> Options include potentially one, few, or many direct recipients:

- Single Entity/National Green Bank
- Multiple potential recipients
  - 1. States/Municipalities/Tribes
  - 2. Green Funds
  - 3. Collective Action Geographic
  - 4. Collective Action Sectors
- Mixed approach (combo of above)
- Other possibilities under review

**GHGRF Charge – Program Structure** 

Next Steps

- Consider all feedback and input
- Interviews
- Review public comments
- 12/1/22 Board meeting and update
- 12/15/22 Board meeting and final charge deliverable(s)

### THANK YOU

## **Objectives Workgroup**

## Workgroup Overview

#### Provide considerations around the GHGRF's primary purpose:

- To fund and/or finance projects intended to reduce GHG emissions that are not being resourced today, particularly those in low-income and historically disadvantaged communities, because:
  - There is a lack of requisite capital at reasonable costs;
  - Priority areas for reducing GHGs (e.g., buildings, transportation, industry, agriculture) may not readily lend themselves to existing funding structures in priority communities;
  - There is a lack of technical and human capacity to prepare grant applications; and
  - There is a lack of start-up "capital" (e.g., technical assistance and planning grants).

#### Focused on two areas:

- Program Efficiency
  - Design Elements
  - Complementary Programs and Structures
- Environmental Justice / Definition of "Low-Income and Disadvantaged Communities"
  - Definition and Support Considerations
  - Technical and Financial Assistance

## **Overarching Concepts**

Acknowledge competing mandates

- Leveraging financing and ensuring GHGRF funds flow to disadvantaged communities will not always lead to prioritizing the same types of projects or community support
- EPA has flexibility to design the GHGRF to empower states, municipalities, tribes and eligible entities to select solutions that accomplish one or another objective well, while ensuring performance of both in the aggregate. For example, EPA could:
  - Enable project selection that:
    - Prioritizes GHG reduction projects that provide direct benefits to disadvantaged communities, but that will not necessarily leverage private capital (e.g., capacity building; workforce development; reduction of localized pollution)
    - Enhances funding additionality and recycling that may not provide immediate benefits to disadvantaged communities but that are likely to provide funding sustainability for GHG reduction programs for the longer term (beyond 2024)
  - Establish performance metrics demonstrating that selected projects in the aggregate accomplish overarching objectives

## **Overarching Concepts**

Balance equity and access with leverage goals

- Seek higher levels of financing leverage for projects in communities with greater capacity and access to resources
- Lower leverage requirements for projects requiring some subsidization, associated with less resourced communities
- No leverage requirements for grant funded projects primarily intended to provide various benefits/TA to disadvantaged communities

Balance need for "shovel-ready" projects with capacity building goals

- Goal is rapid deployment
- Conventional meaning of 'shovel ready' projects (e.g., designed, engineered, permitted) is only one path to achieving this goal and could exclude projects that could/should be supported by one or more of the GHGRF streams

## Program Efficiency – Design Elements

Charge Question I.b.i:

- How can the GHGRF grant competition be designed so that funding is highly leveraged (i.e., each dollar of federal funding mobilizes multiple dollars of private funding)?
- How can the funding be used to maximize "additionality" (i.e., the extent to which funding catalyzes new projects that would not otherwise occur)?
- How can EPA balance the need for grants for capacity building and short-term results with financial structures that will allow capital to be recycled over time?
- Where (if at all) is it appropriate to impose sustainability requirements on direct or indirect beneficiaries of GHGRF funding?

#### Providing guidance in terms of:

- Strengths and weaknesses of each of the above elements by sample recipients/project type
- Strong fits and weak fits of each element by recipient/project type
- Specific examples/case studies of where each element has been successful or not in comparable funding programs
- Considerations and potential trade-offs regarding equitable access to funding, capacity building, and an efficiency emphasis

#### Additional considerations related to efficiency elements in program design, including:

- Intrinsic trade-offs between elements of program design and program objectives
- Coordination around existing and future TA funding sources
- Possibility to piggyback upon existing direct-to-consumer funding programs, e.g., tariff on-bill financing via utilities
- Risk of compromising other supports, particularly at the low-income household level (e.g., benefits cliffs)
- Indicators of success

## Program Efficiency – Design Elements

Design Element	Strengths/Weaknesses	Strong/Weak Fits	<b>Recipient Examples</b>
<b>Leverage:</b> The ability of a recipient or project to evidence additional private sector funding sources	<ul> <li>Strengths</li> <li>Crowds in additional dollars from other sources</li> <li>Enables larger projects</li> <li>Stretches taxpayer resources further</li> <li>Can provide risk mitigation for private capital</li> </ul>	<ul> <li>Strong Fits</li> <li>Large asset-backed projects</li> <li>Subordinate tranches in structured funds</li> <li>Nonprofit and commercial projects</li> <li>Residential solar leases</li> </ul>	<ul> <li>Green Banks</li> <li>CDFIs</li> <li>Infrastructure Authorities/EDAs</li> </ul>
	<ul> <li>Weaknesses</li> <li>Burdensome from a structuring and transaction cost standpoint</li> <li>May increase cost of capital</li> <li>Less workable in smaller projects</li> </ul>	<ul> <li>Weak Fits</li> <li>Smaller community-based organizations</li> <li>Smaller municipalities</li> <li>Matching TA dollars</li> <li>Non-commercial project costs (e.g., predevelopment)</li> </ul>	<ul> <li>Michigan Saves (1:30x)</li> <li>SSBCI requires minimum 1:1x</li> <li>On-bill financing</li> <li>C-PACE</li> </ul>
Additionality: Demonstrating the essential contribution of the GHGRF to getting the project done; "but for this funding"	<ul> <li>Strengths</li> <li>Enables attribution to leaders, organizations on successful projects</li> <li>May enable projects in disinvested/overlooked communities</li> </ul>	<ul> <li>Strong Fits</li> <li>Where capital has historically not been invested</li> <li>Where funding is clearly taking "de-risking" role for private capital</li> <li>Planning and predevelopment funding</li> </ul>	NMTC "but for" tests
	<ul> <li>Weaknesses</li> <li>Challenging to measure and easy to critique</li> <li>May complicate decision-making around eligible projects</li> <li>Doesn't always collaborate well with other funding sources</li> </ul>	<ul> <li>Weak Fits</li> <li>Industrial/large scale projects</li> <li>Loss-sharing guarantees</li> <li>Pari passu funding structures</li> <li>Senior debt</li> </ul>	

### Program Efficiency – Design Elements

Design Element	Strengths/Weaknesses	Strong/Weak Fits	<b>Recipient Examples</b>
<b>Capital Recycling:</b> The ability of recipients to recycle/re-deploy the funding provided over time	<ul> <li>Strengths</li> <li>Bolsters financial sustainability of recipients for the long-term</li> <li>Ensures long-term impacts after program funding window is closed</li> <li>Builds intermediary capacity</li> <li>Enables strong leverage opportunities</li> </ul>	Strong Fits <ul> <li>Financial intermediaries who are lenders</li> </ul>	<ul> <li>Credit Union secondary shares</li> <li>CDFI FA awards</li> <li>CDBG programs</li> <li>Green Banks</li> </ul>
	<ul> <li>Weaknesses</li> <li>Desire to recoup capital reduces risk tolerance of funds</li> <li>Incentives for recipients may be at odds with purpose – e.g., funds may be used for reserves or liquidity vs. deployment</li> <li>Ability to recycle capital within reporting period may be limited by long-term project finance cycles, which are common in energy (20 years)</li> </ul>	<ul> <li>Weak Fits</li> <li>Equity investments (because of both illiquidity and risk)</li> <li>Start-up capital</li> <li>Technical assistance</li> <li>Projects without material cash payout over 10+ years</li> </ul>	
<b>Short-Term Capacity Building</b> : Use of funds is predominantly to hire expertise/staff to improve communities' ability to plan and execute GHG reduction projects	<ul> <li>Strengths</li> <li>Evident and persistent demand for capacity building support, especially in low-income and disadvantaged communities</li> <li>High demand for in-community, long-term human capacity</li> <li>Can increase uptake/demand for financial assistance/pipeline projects</li> </ul>	<ul> <li>Strong Fits</li> <li>In communities with coordinated access to long-term TA funding</li> <li>When paired with green workforce development to increase local skilled workforce</li> <li>For short-term trainings around grant applications, reporting, and compliance</li> <li>Planning uses for GHG projects</li> </ul>	<ul> <li>Smaller/rural municipalities</li> <li>CBOs such as local CDCs and neighborhood assistance orgs</li> <li>Existing community-focused TA providers with ability to expand with GHG reduction focus</li> </ul>
	<ul> <li>Weaknesses</li> <li>Once money is allocated, limited future funding sources</li> <li>Short funding period incentivizes use of consultants vs. full- time hires</li> <li>No leverage/recycling ability</li> <li>Overlooked communities may be unaware of funding opportunities and lack grant application bandwidth</li> </ul>	<ul> <li>Weak Fits</li> <li>Not as well suited to project-specific funding</li> </ul>	
Long-Term Sustainability:	TBD	ТВО	TBD

## Program Efficiency – Complementary Programs and Structures

Charge Question I.b.ii:

- Are there programs/structures at the federal or state level that could effectively complement the GHGRF?
- How can EPA best leverage the GHGRF to support lasting, long-term (beyond 2024) transformation of the clean energy and climate finance ecosystem, especially for disadvantaged communities, and greenhouse gas and other air pollution reductions?

#### **Considerations include:**

- Where the EPA can "piggyback" on existing capacity and pull examples from existing/established federal programs and initiatives (e.g., Justice40)
  - Highlight existing programs that tie into GHG objectives and reductions and deliver synergistic solutions (e.g., National Community Solar Partnership, DOE Energy Efficiency Revolving Loan Fund)
- Using federal collaboration to coordinate financial assistance
- Presently researching characteristics of funding programs that have been effectively leveraged with other funding sources

# Environmental Justice / Definition of "Low-Income and Disadvantaged Communities" – Definition and Support Considerations

Charge Question I.a.i: What considerations should EPA take into account in defining "low-income" and/or "disadvantaged" communities in order to ensure fair access/that the funding benefits disadvantaged communities?

Charge Question I.a.ii:

- How can EPA ensure that communities and organizations who have received little or no funds in the past receive priority consideration for funding?
- How could EPA identify the low-income and disadvantaged communities it should prioritize for greenhouse gas and other air pollution reduction investments?

Provide maximum inclusivity and flexibility to ensure any and all disadvantaged households and communities are eligible for GHGRF funds

- Broad definition of "community" To include neighborhoods within larger cities, areas with substantial exposure to health risks related to GHG emissions, and rural locales lacking critical infrastructure, while maintaining a minimum level of standardization across states and territories.
  - Adopt the "Disadvantaged Communities" locations or definitions consistent with state statute(s)
  - Use the definitions of disadvantaged communities, households and organizations consistent with other Federal programs (e.g., HUD area median income low and moderate-income thresholds; SBA size standards; ASDWA environmental justice tool); and
  - If a specific state statute does not exist or direct/indirect recipients do not incorporate other federal definitions, mapping tools (e.g., EPA EJSCREEN) could be used

# Environmental Justice / Definition of "Low-Income and Disadvantaged Communities" – Definition and Support Considerations

# **Example** – All states have criteria and definition of "disadvantaged community" for purposes of DWSRF

- Majority incorporate Median Household Income (MHI)
- Nearly half use population as a criteria

Average MHI and population could exclude disadvantaged neighborhoods in larger cities or cities with income disparities

Flexible definition would reach more lowincome and disadvantaged communities



Source: Tally compiled from Association of State Drinking Water Administrators' website summarizing state definitions of disadvantaged communities for DWSRF: <u>https://www.asdwa.org/environmental-justice/</u>

# Environmental Justice / Definition of "Low-Income and Disadvantaged Communities" – Technical and Financial Assistance\*

Charge Question I.a.iii: What kinds of technical and/or financial assistance should GHGRF funding recipients provide to ensure that lowincome and disadvantaged communities are able to be direct or indirect beneficiaries of GHGRF funding? Please identify supports that could help communities with project implementation.

- Type of assistance will vary across phases of implementation and based on:
  - Eligible recipients
  - Project types
  - Benefit pathways
  - Issues faced by community
- Third parties to coordinate across communities and departments and create capacity to develop, apply, fund, and implement projects, for example:
  - AmeriCorps
  - State extension programs
  - Silver Jackets (USACE)
  - Engineers Without Borders
  - Senior design projects at accredited university engineering programs

Environmental Justice / Definition of "Low-Income and Disadvantaged Communities" – Technical and Financial Assistance

Technical assistance will vary depending on several factors, including:

- Who needs assistance (e.g., project developers, communities, local government entities, households)?
- Project type (e.g., buildings, industry, power sector, transportation)
- What are the benefits being achieved (e.g., if local workforce development is the goal, technical assistance might include workforce training, small business development, etc.)

## Execution, Reporting, and Accountability Workgroup

Workgroup Overview

- Recap of Tasks/Scope
- Approach
- Planned Deliverable
- Progress To Date

## Recap of Tasks/Scope

- EFAB options for consideration will include:
  - How to meet key deadlines
    - Short-term The 180-day requirement
    - Medium-term Next two years before funds expire in 2024
    - Long-term Beyond 2024
  - Responsible implementation and oversight of funding
  - Metrics for success from application to post-implementation
- Scope of this workgroup will include ongoing communication with Workgroups 1 (Objectives) and 2 (Program Structure) to synchronize, not duplicate, feedback

Approach

- Maintain balance between achieving the goal of the enabling legislation while being good stewards of taxpayer money
  - Get funds deployed to qualifying eligible recipients
    - Don't create bureaucracy that could lead to delays or a chilling effect deterring eligible recipients from even applying
  - Thorough due diligence
    - How to reach legislation goals and ambitions?



Approach

- Pick and choose from existing federal, state, and local governmental as well as NGO programs
  - Use existing programs as examples (preferred)
  - Replicate that which has already proven successful
  - Identify and apply lessons learned from other programs



## Planned Deliverable

- Each team member is using what is already in their wheelhouse
  - Leveraging contacts
  - Reviewing literature and research
  - Soliciting expert opinions
  - Encouraging public comment
- Workgroup deliverable to EPA will be where these overlap
- Deliverable = list of options with identified pros and cons



## Progress To Date

Charge Question III.a – Given the tight timeline for implementation of the funds, what are key steps that EPA could take in the short- (next 180 days), medium- (next two years before funds expire in 2024), and long-term (beyond 2024)?

Possible Avenues to Meet Key Statutory Deadlines:

- Now through 2/12/23
  - Accept public comment Now through 12/5/22
  - Accept EFAB work product 12/15/22
  - Identify metrics for success and award priorities
  - Publish NOFO and accept applications TBD
  - Announce Initial Awards TBD
- 2/13/23 to 9/30/24
  - Implementation milestones, including fund expenditure
  - Deployment metrics and impact reporting
  - \$26,970,000,000 awarded to direct recipients by 9/30/24
- 10/1/24 to 9/30/31
  - Ensure funds are appropriately and sustainably expended
  - Evaluate program metrics

## Progress To Date

Charge Question III.b – What types of requirements could EPA establish to ensure the responsible implementation and oversight of the funding?

- Reference other federal programs in place to reduce obstacles to assisting and deploying funds into low-income and disadvantaged communities
- Explore existing federal templates and best practices that are used to evaluate program effectiveness

## Progress To Date

Charge Question III.c – What mechanisms could eligible recipients adopt, including governance as well as other mechanisms, to ensure that their applications and subsequent implementation efforts ensure: (1) accountability to low-income and disadvantaged communities; (2) greenhouse gas emission reductions; and (3) the leveraging and recycling of the grants?

- Figuring out how to measure success, from application to postimplementation...
  - TBD Build upon program metrics being defined by Workgroups 1 (Objectives) and 2 (Program Structure) to establish goals
  - Incorporate appropriate consumer protections
  - Ensure grantees and sub-grantees are accountable to the communities they serve