



Office of Environmental Justice &
External Civil Rights



**COMMUNITY
CHANGE GRANTS**

Environmental and Climate Justice

U.S. Environmental Protection Agency

DECEMBER 7, 2023

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Agenda

- 1 Community Change Grants Program Overview
- 2 Threshold Eligibility Criteria
- 3 Technical Assistance Overview
- 4 Track I Overview
- 5 Track II Overview
- 6 Application Submission, Evaluation and Selection Process
- 7 Programmatic and Administrative Requirements
- 8 Closing
- 9 Q&A



Overview of Community Change Grants Program

1



Introduction

EPA received \$3 billion through the Inflation Reduction Act (IRA) to fund environmental and climate justice activities to benefit disadvantaged communities.

- \$2.8 billion for grants including \$2 billion for the Community Change Grants (CCG) Program
- \$200 million for technical assistance related to the grants
- Grants cannot exceed three years (no extensions)
- All grants must be awarded by September 30, 2026



Goals

Designed with meaningful community, Tribal, and other stakeholder input, the investments EPA makes through the Community Change Grants are intended to achieve the following goals:



Fund community-driven pollution and climate resiliency solutions



Invest in strong cross-sectoral collaborations with partners working with and for communities



Unlock access to more significant resources



Deliver technical assistance and capacity-building support



Strengthen communities' decision-making power

Workgroups

Convened NEJAC IRA Accountability and EPA workgroups for recommendations on approach

Request for Information

60-day public comment period
Feb - April 2023

Community

Held Tribal, Border, Territorial and other program design webinars



**NOFO
PROGRAM
DESIGN
PROCESS**

Track I

Community-Driven Investments for Change

Funding Available: approx. \$1.96 billion

Number of Awards: approx. 150

Per Award Amount: \$10M - \$20M each

Track II

Meaningful Engagement for Equitable Governance

Funding Available: approx. \$40 million

Number of Awards: approx. 20

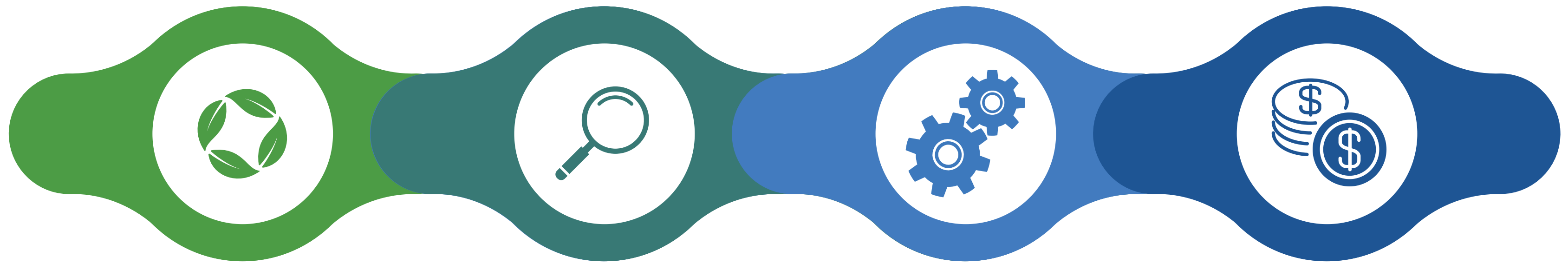
Per Award Amount: \$1M - \$3M each

Technical Assistance

- [Community Change Technical Assistance Program](#)
- [Equitable Resilience Technical Assistance Program](#)
- [Thriving Communities Technical Assistance Centers \(TCTACs\)](#)



Program Innovations



**Rolling
Applications**

**Innovative
Evaluation
Process**

**Expedited
Selection
Process**

**Indirect Cost
Limitations**

Overview of Threshold Eligibility Criteria

2



Eligibility

Applications must meet **all** eligibility criteria, as outlined in [Section III](#) of the NOFO, to be considered for funding.



Comply with the content and submission requirements



Meet the eligibility and statutory partnership requirements in [Section III.A](#)



Meet threshold criteria in [Section III.D](#), including that the projects will benefit disadvantaged communities



Projects must be completed within three years



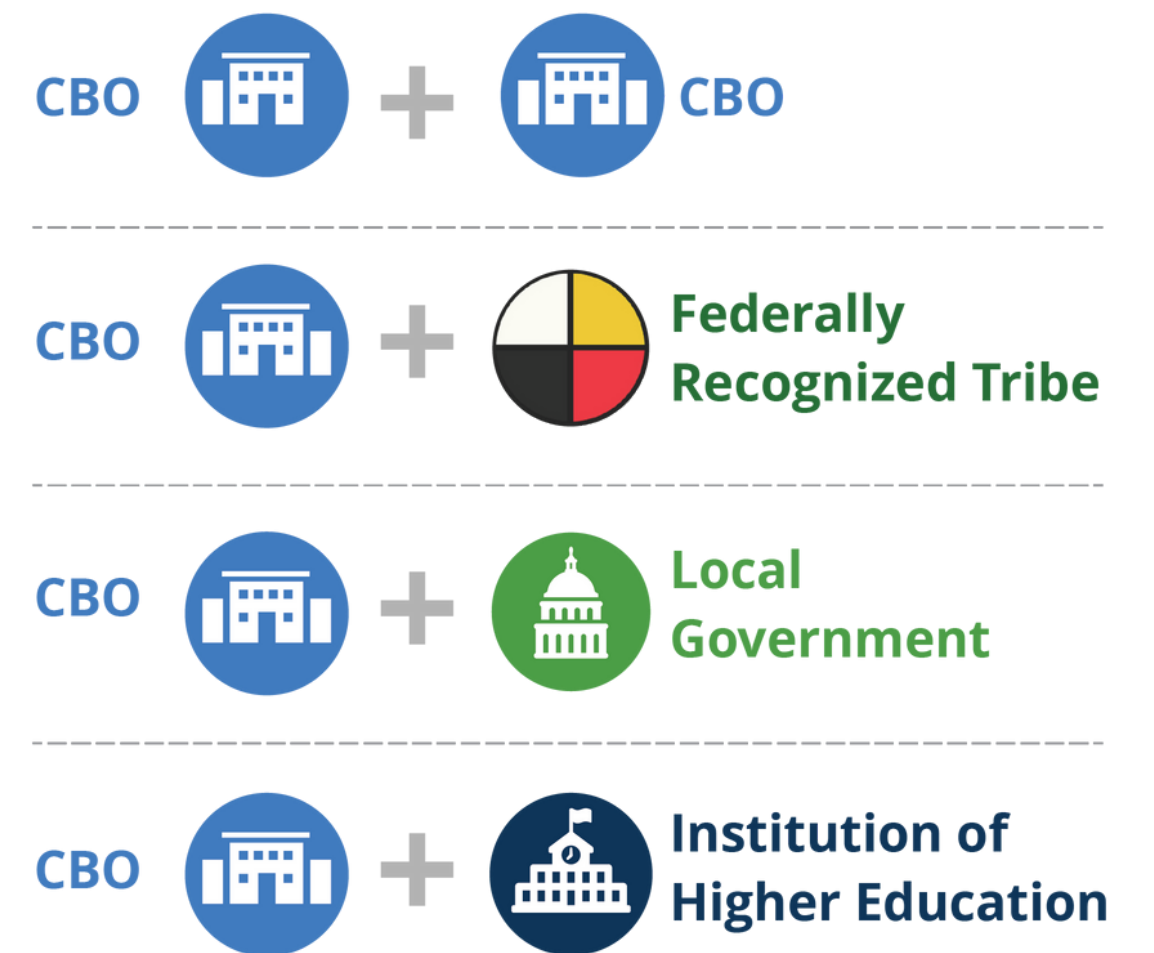
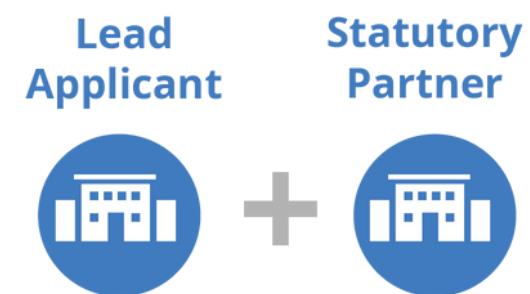
Applications to conduct scientific research; assessment, removal, or remediation of Superfund sites; or community relocation are ineligible.

Statutory Partnership

Applicants must either be a partnership of two community-based nonprofit organizations (CBOs) or a partnership between a CBO and a federally recognized Tribe, local government or institution of higher education.

Partnerships must be documented and meet certain legal requirements (see [Appendix B](#)).

Additional information on eligibility and partnerships can be found in [Section III](#) of the NOFO.



Note: While the CBO does not have to be the “Lead Applicant,” all statutory partnerships must include a CBO.

Collaborating Entities

Other entities can be involved in projects as **collaborating entities**.

Collaborating Entities may include entities that legally could be Statutory Partners (CBOs, Federally-recognized Tribes, local governments, and institutions of higher education) and entities that cannot legally be Statutory Partners (e.g., states and territorial governments).



How It Works

FORM A STATUTORY PARTNERSHIP

Lead Applicant



Statutory Partner



IDENTIFY COLLABORATING ENTITIES TO LEAD PROJECTS



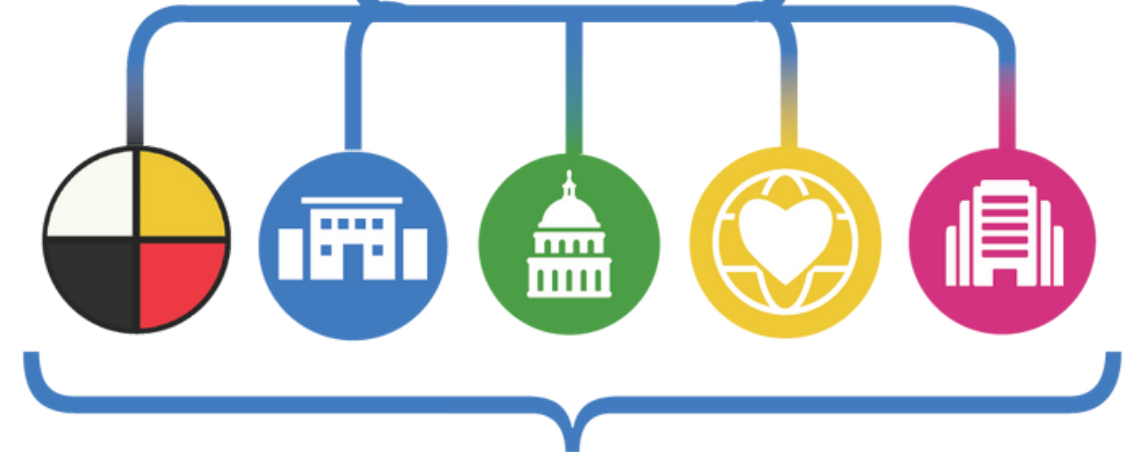
THE COLLABORATIVE



Lead Applicant



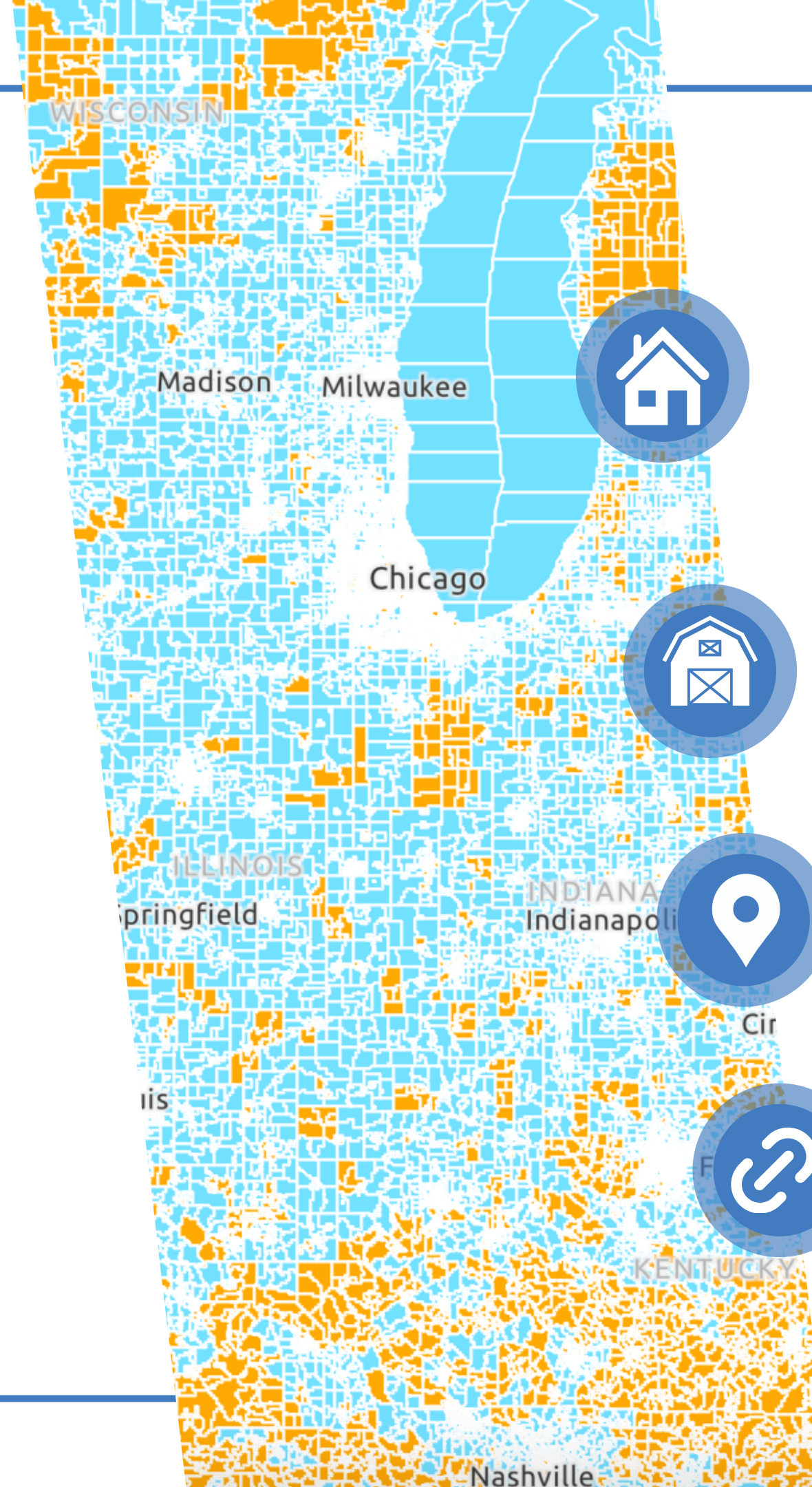
Statutory Partner



Collaborating Entities

Disadvantaged Communities

Applicants must demonstrate that the projects in their application will benefit a disadvantaged community. EPA is defining disadvantaged community as one that meets at least one of the following criteria:



A geographically-defined community identified as disadvantaged on the EPA IRA [Disadvantaged Communities Map](#)



A farmworker community

OR



A Disadvantaged Unincorporated Community (DUC)



More information can be found in [Appendix A](#) of the NOFO.

Target Investment Areas



\$50M

**Disadvantaged
Unincorporated
Communities**



\$150M

**Tribes in
Alaska**



\$300M

**Tribal
Communities
(lower 48 states + HI)**



\$100M

**Southern
Border
Communities**



\$50M

U.S. Territories

These Track I investment area amounts are approximate and may be adjusted based on the quantity and quality of applications received.

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Overview of Technical Assistance





CCG TA

IRA provided EPA with \$200M for technical assistance (TA) for eligible entities related to the Environmental and Climate Justice Program, including the Community Change Grants.

Only available to eligible entities for the grants



Purpose

- Technical assistance will be available for:
 - **pre-award** support including but not limited to designing a project, preparing an application, grants.gov support, or facilitating partnerships, and
 - **post-award** support to help grant recipients manage, oversee, perform, and report on the grants.
- TA does not include writing an application *for* an applicant.
- Receiving technical assistance does not guarantee that applicants will be selected for funding.



Environmental Justice

CONTACT

Community Change Grants Technical Assistance Request Form

MB Control No: 2030-0051

Revision Date: 05/31/2024

This form is to express interest in receiving technical assistance for the Environmental and Climate Justice Program's [Community Change Grants](#).

Types of TA

- [Community Change Technical Assistance \(CCTA\)](#)
 - Broad-based pre-award and post-award TA
 - Submit an on-line [TA Request Form](#)
 - Call to make a TA Request or ask questions: 1 (800) 540-8123
 - Email: EJ_TechAssist@epa.gov
- [Community Change Equitable Resilience Technical Assistance \(CCER TA\)](#)
 - Submit an on-line [TA Request Form](#)
 - More limited and tailored TA focusing on disaster-prone areas

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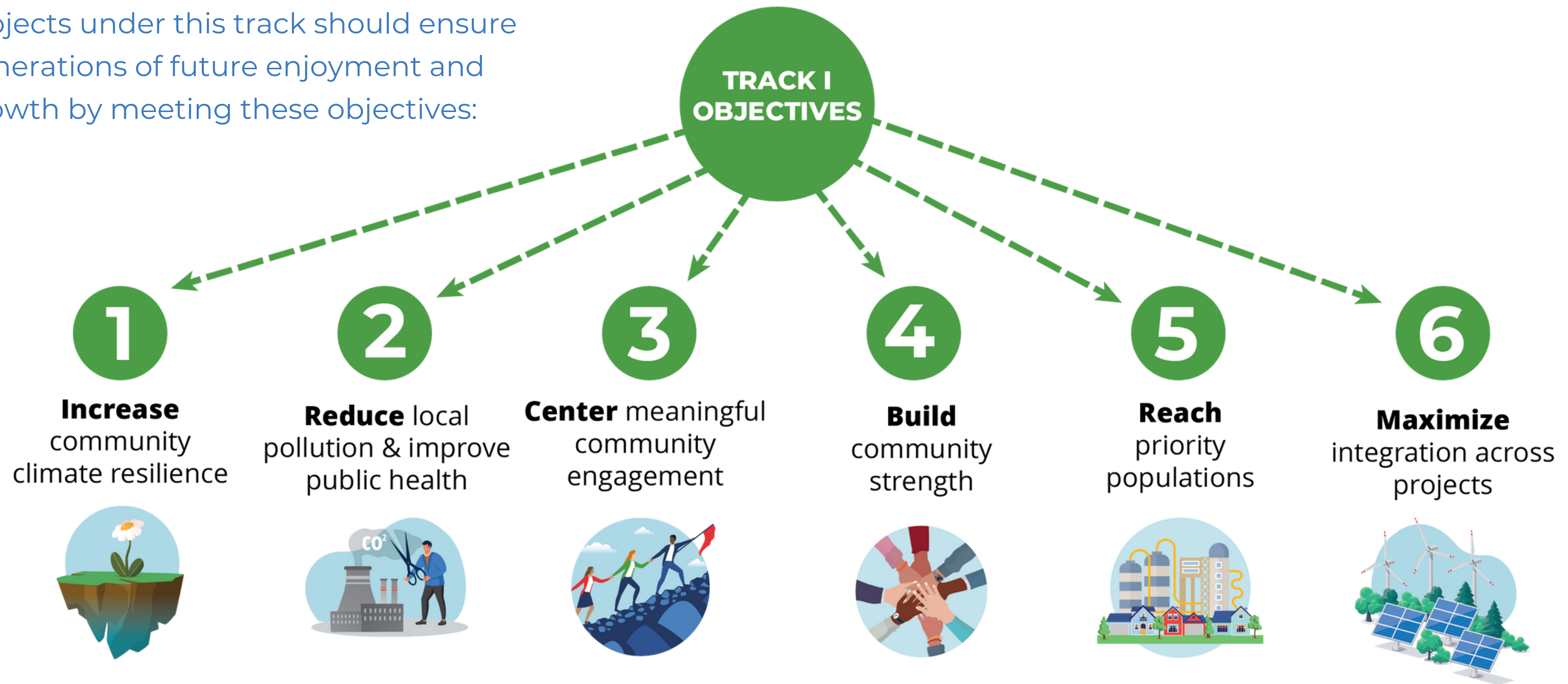
Track I Overview

Community-Driven Investments for Change

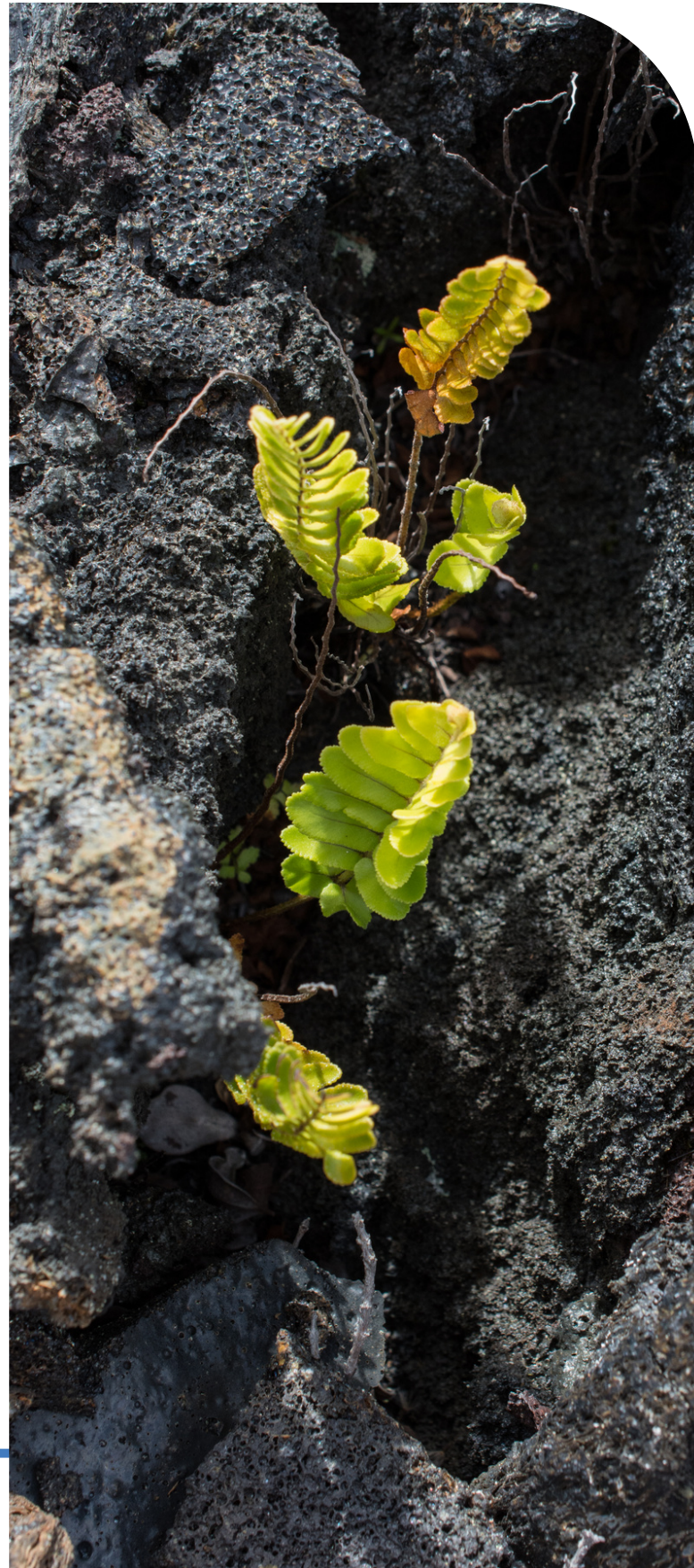


Community-Driven Investments for Change

Projects under this track should ensure generations of future enjoyment and growth by meeting these objectives:



Note: Projects must be place-based and include a Project Area Map. They are not intended to be regional or state-wide projects, as described in [Appendix A](#).



Track 1 Requirements

- 1 Climate Action Strategy
- 2 Pollution Reduction Strategy
- 3 Community Engagement and Collaborative Governance Plan
- 4 Community Strength Plan
- 5 Readiness Approach
- 6 Compliance Plan

1



Climate Action

Applications must address at least one climate action strategy that serves to increase a community's resilience or adaptive capacity:

-  Green Infrastructure & Nature-Based Solutions
-  Mobility & Transportation Options
-  Energy-Efficient, Healthy and Resilient Housing & Buildings
-  Microgrid Installation
-  Community Resilience Hubs
-  Brownfield Redevelopment
-  Waste Reduction & Management
-  Workforce Development

See [Appendix C](#) for project examples

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Pollution Reduction

Applications must include at least one pollution reduction strategy that focuses on pollution monitoring, prevention, and remediation of quantifiable and health harming pollutants:

-  Indoor Air Quality & Community Health
-  Outdoor Air Quality & Community Health
-  Clean Water Infrastructure
-  Hazardous Waste Management

See [Appendix D](#) for project examples

3



Engagement and Governance Plan

- **Community Engagement:** Applicants should address the following elements:
 - Past community outreach and engagement conducted
 - Methods for implementation
 - Measures to minimize and mitigate barriers
 - Government involvement
- **Collaborative Governance Structure:** The applicant should provide details regarding the roles and responsibilities of the Lead Applicant, Collaborating Entities, and community residents and/or community-selected representatives for implementing, managing, and overseeing the application's project activities, including how they should meet regularly to discuss project implementation.

4



Community Strength Plan

- Advancing environmental and climate justice requires bolstering the strength and economic prosperity of a community for the benefit of local residents, while also ensuring those residents can remain within the community and benefit from the investments over the long term.
- This plan should describe how the projects are intended to:
 - maximize the economic benefits of the projects for existing residents in the Project Area, and
 - avoid unintended consequences for existing residents in the Project Area including the displacement of residents in the Project Area.

5



Readiness Approach

To ensure projects can begin shortly upon award and be completed within 3 years, applicants must demonstrate:

- **Government Approvals:** Obtained government approval if needed.
- **Federal Requirements for Construction:** Complies with any statutory and EO requirements that apply to construction projects.
- **Alignment with Existing Plans:** Project is consistent with governmental land use restrictions.
- **Site Control:** Owns, controls or has legal access to the site of a project.
- **Operations and Maintenance:** Operations and maintenance of the investment will be assured during and after the grant award.

6



Compliance Plan

Applicants must submit a Compliance Plan that describes how they will:

1. Ensure compliance with the grant's terms and conditions, including:

- Financial management: [2 CFR § 200.302\(b\)](#)
- Internal controls: [2 CFR § 200.303](#)
- Requirements for pass-through entities: [2 CFR § 200.332](#)

2. Manage broader legal and compliance risks

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Track II Overview
Meaningful
Engagement for
Equitable Governance





Objectives

- To build the capacity of communities to evaluate and redress environmental and climate injustices
- To give disadvantaged communities a meaningful voice in government decision-making processes



Project Examples

- Educational and Training Programs
- Environmental Advisory Boards (EABs)
- Collaborative Governance Activities
- Participation in Governmental Funding and Budgeting Processes



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Overview of
**Application
Submission, Evaluation
and Selection Process**

ROLLING APPLICATION



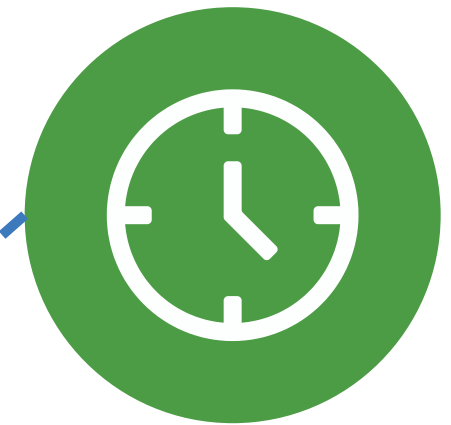
November 21,
2023

- Applications will be accepted, reviewed, and awarded on a rolling basis to provide flexibility to the maximum extent practicable.
- Lead Applicants may submit a maximum of two applications and receive up to two awards, as described in [Section II.C](#) of the NOFO.

Applications
Open

ROLLING APPLICATION

- Application packages will be accepted until November 21, 2024, at 11:59 PM (Eastern Time) through [grants.gov](https://www.grants.gov).
- EPA cannot guarantee that funding will be available through the end of the application period as funding could be exhausted before the conclusion of the application period.
- Note the differences in application submission requirements and the evaluation process for Track I and Track II applications in [Sections IV.B](#) and [V](#) of the NOFO.
- Resubmission option under certain conditions, as noted in [Section II.C](#) of the NOFO.

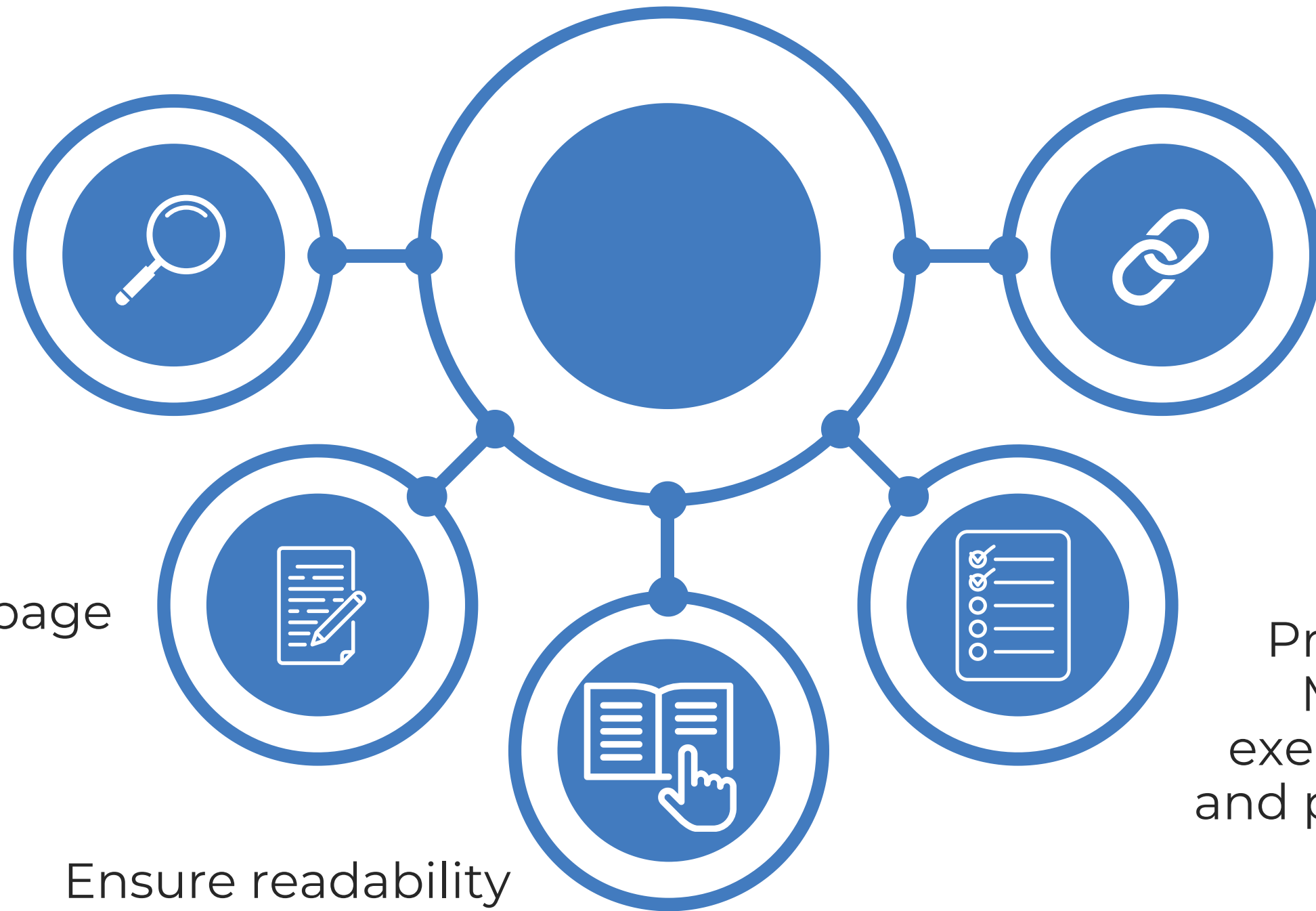


November 21,
2024

Applications
Close

Application Submission

Follow the instructions and requirements set forth in Section IV of the NOFO



Register with **SAM.gov** and **grants.gov** ASAP

Make note of page limits

Project narrative MUST include executive summary and project workplan

Ensure readability



Required Forms

Mandatory Documents and Forms for Track I and II Applications

- Application for Federal Assistance (SF-424)
- Budget Information for Non-Construction Programs (SF-424A)
- EPA Key Contacts Form 5700-54
- EPA Pre-award Compliance Review Report Form 4700-4
- Project Narrative Attachment Form
- Attachment A: Program Budget Template
- Attachment B: Partnership Agreement
- Attachment C: Any other documents or information not listed above, such as an Indirect Cost Rate Agreement



Required Forms

Mandatory Attachments for Track I Applications ONLY

- Attachment D: Project Area Map
- Attachment E: Community Engagement and Collaborative Governance Plan
- Attachment F: Community Strength Plan
- Attachment G: Readiness Approach Information
- Attachment H: Compliance Plan

Evaluation Criteria

Track I



Community Driven Investments
for Change (80 pts)



Program Management,
Capability, and Capacity (35 pts)



Readiness to Proceed,
Feasibility, and Sustainability
(40 pts)



Oral Presentations (45 pts)

Track I SELECTION PROCESS



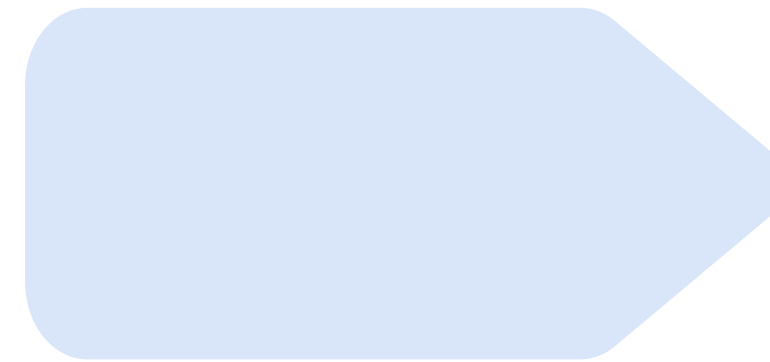
Eligibility

Applications reviewed for threshold eligibility



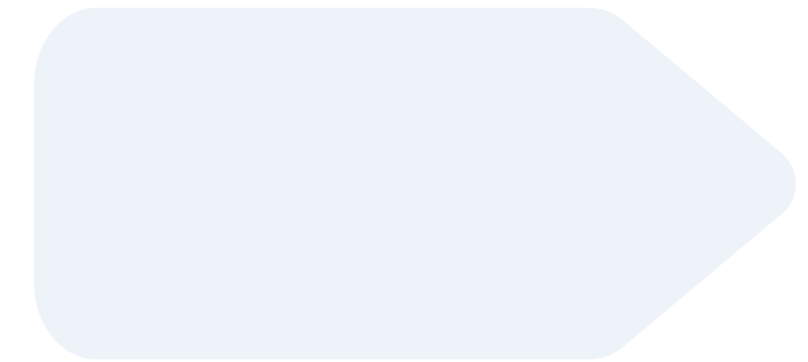
Written Evaluation

Written applications that receive a score of 110 or higher (out of 155) will be invited to give an oral presentation



Oral Presentations

Worth a maximum of 45 points
Applications with a combined score of 170 or more, based on written and oral, move to final selection consideration



Final Consideration

Applications receiving a combined score of between 110 and 169 will be ranked and reviewed approximately monthly for final selection consideration

Evaluation Criteria

Track II



Program Objectives (35 pts)



Project Collaboration and
Participation (20 pts)



Project Linkages (4 pts)



Budget (8 pts)

Environmental Results (6 pts)



CBO Experience and
Commitment (5 pts)

Programmatic and
Managerial Capability and
Resources (16 pts)



Past Performance (6 pts)

Track II **SELECTION PROCESS**



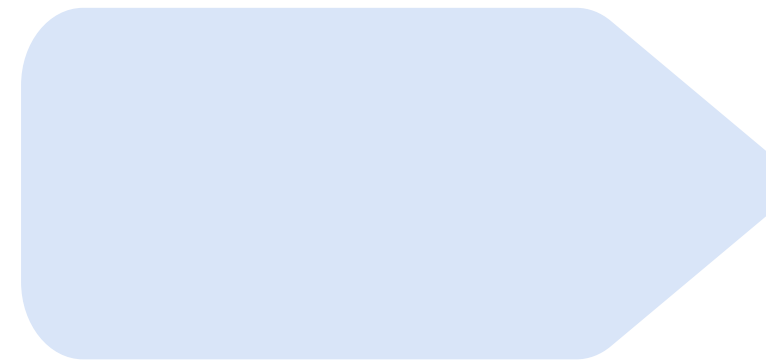
Eligibility

Applications reviewed for threshold eligibility

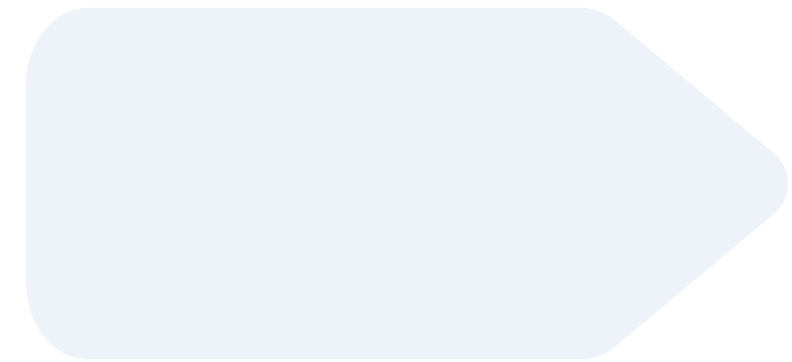
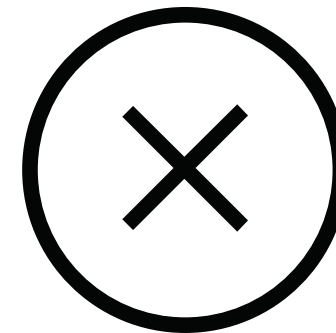


Written Evaluation

Written applications that receive a score of 85 or higher (out of 100) will move to final selection consideration



Oral Presentations



Final Consideration

Applications receiving a score below 85 will be ranked and reviewed approximately monthly for final selection consideration

Additional Selection Factors

Selection Official may also consider:

- Geographic diversity
- How the application supports and advances EPA and OEJECR's goals and priorities
- Organizational diversity (i.e., applicant type and size)
- Participation in a federal capacity-building program
- Whether the projects support, advance, or complement funding related to Community Disaster Resilience Zones (CDRZs) as designated by FEMA
- Capacity and capabilities of Lead Applicants to manage two awards, if applicable
- Ability to leverage additional resources
- Duplicate funding considerations
- Availability of funds





Debriefings and Disputes

Applicants who are deemed ineligible or who are not selected for funding may request a debriefing.

For more information on the debriefing and dispute process, see [Section VI](#) of the NOFO.



Resubmission

Applicants who are deemed eligible but are not selected for funding may, after timely requesting and receiving a debriefing on the application, resubmit.

For more information see [Section II.C](#) of the NOFO.

Note: Applicants who EPA finds are ineligible under section 138(b)(3) of the Clean Air Act should not resubmit their applications unless the statutory deficiency has been cured.

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Overview of
**Programmatic and
Administrative
Requirements**



Programmatic Performance

In accordance with 2 CFR § 200.329, each grantee will be subject to program performance reporting requirements.

Financial and Administrative

Each grantee will be subject to financial and administrative reporting requirements, which will be included in the grant agreement's terms and conditions.



Indirect Cost Limitation

- Per the indirect costs deviation process in [2 CFR 200.414\(c\)](#), there will be a limit on the indirect costs charged against any CCG award or subaward to 20% of the Federal award.
- This is allowable through the publicly available waiver provisions in section 9.0.a. of [EPA's Indirect Cost Policy](#), consistent with [2 CFR 200.414\(c\)\(3\)](#).
- EPA may grant waivers to the requirements in the policy where the waiver is based on circumstances of compelling urgency, unique programmatic considerations, extraordinary compliance burdens on recipients, or where a waiver would otherwise be in the public interest
- EPA believes that the 20% limit is justified by unique programmatic considerations and is in the public interest.





Fraud, Waste and Abuse

Fraud. False representation of a material fact; intentional deception to deprive the U.S. or EPA of something of value; obtaining an undeserved benefit or privilege

Waste. Taxpayers not receiving reasonable value for money; inappropriate act or omission; mismanagement, inappropriate actions, inadequate oversight

Abuse. Deficient or improper behavior compared to reasonable and necessary business practices; misuse of authority for personal gain; not necessarily a violation of laws, regulations, or grant provisions



Fraud, Waste and Abuse

Indicators of Fraud, Waste, and Abuse can be found on the [EPA Office of Inspector General](#) website.

Report suspected fraud, waste, and/or abuse to:

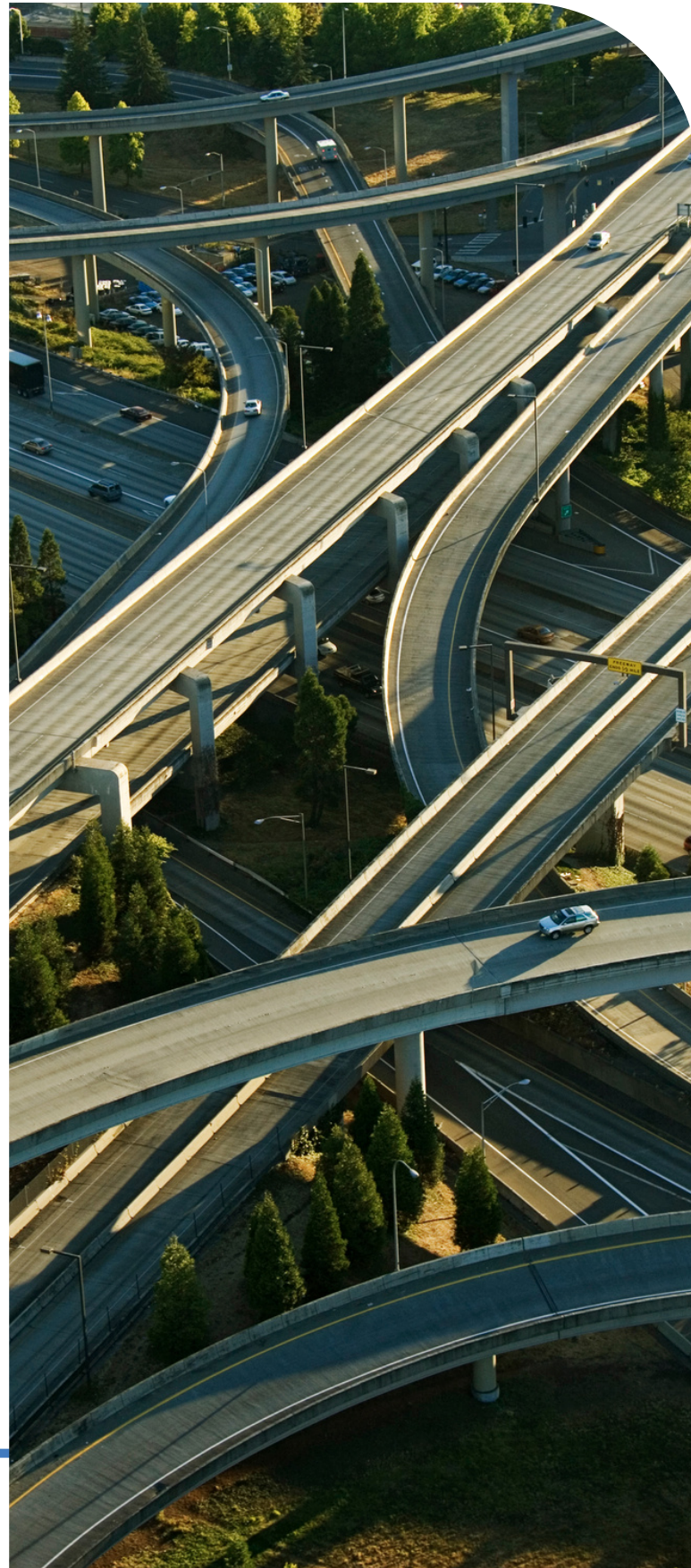
- EPA Project Officer for the award
- EPA Office of Inspector General

OIG Hotline: 1 (888) 546-8740



Davis Bacon Act

- Applies to contractors and subcontractors performing work on construction contracts in excess of \$2,000
- **“Construction”** is defined as “. . . erection, alteration, or repair (including dredging, excavating, and painting) of buildings, structures, or other improvements to real property, and activities in response to a release or a threat of a release of a hazardous substance into the environment, or activities to prevent the introduction of a hazardous substance into a water supply.”
- Applicants must demonstrate that they have systems in place, or a plan to have such systems in place immediately after the grant award, to comply with Davis-Bacon and Related Acts prevailing wage requirements.



Build America, Buy America Act (BABA)

- Requires all iron, steel, manufactured products, and construction materials used in federally funded infrastructure projects to be produced **in the United States**
- **“Infrastructure”** is defined broadly to include structures, facilities, and equipment that are **permanently affixed** and **serve a public function**, including:
 - buildings and real property; water systems; energy generation, transport, and distribution; roads, highways, and bridges; public transportation; dams, ports, harbors, and other maritime facilities; intercity passenger and freight railroads; broadband infrastructure



Build America, Buy America Act (BABA)

- **Applying.** Applications should reflect items that are made in the U.S. in the budget and project timelines for any infrastructure projects.
- **Complying.** Recipients will be responsible for ensuring that products used in their projects follow BABA requirements.
- **Waivers.** Recipients may request waivers for items not made in the U.S.
- **Questions.** For help finding products made in the U.S. or other questions about BABA waivers, please contact EPA_BABA_Waiver@epa.gov.
- **More information.** <https://www.epa.gov/cwsrf/build-america-buy-america-baba>



Additional Provisions

Applicants must review the additional provisions that apply to the NOFO and/or awards made under the NOFO. This includes those related to federal civil rights responsibilities.

See [EPA's Solicitation Clauses](#) for more information.



Subawards and Contracts

Prior to naming a contractor (including consultants) or subrecipient in your application as a “partner,” carefully review EPA’s Solicitation Clauses.

- **Collaborative Entities.** Lead Applicant enters into subaward with Collaborative Entities, who are critical to project performance and may be CBOs, local governments, institutions of higher education, Tribes, states, territories, etc.
- **Contractors.** Selected in accordance with competitive procurement regulations and are *not* considered Collaborative Entities under the NOFO.

Subaward vs. Procurement Contract

	Subaward	Procurement Contract
For-profit		✓
Individual Consultant		✓
Non-profit	✓	
Institution of Higher Education	✓	
Federal Agency	✓	
Federally Funded Research & Development Center	✓	✓

Transactions with for-profit companies and individual consultants are considered procurement contracts with few exceptions. Two examples include:

1. Grant recipient provides a subaward to a for-profit company to upgrade equipment owned by the company (the subrecipient) that will be used to carry out the grant purpose.
2. Grant recipient provides a rebate or subsidy to a for-profit company for all or a portion of the costs of the equipment purchased by the company. The rebate or subsidy would be participant support costs and the company (owner of the equipment) would be a program beneficiary.



Subawards and Contracts

- All eligible recipients must comply with the procurement requirements in 2 CFR Part 200 with regard to competition.
- Competition best practices include:
 - Make **good faith efforts to solicit quotes from Disadvantaged Business Enterprises**, required by 40 CFR Part 33.
 - Publicly advertise the competition and keep it open for bidding for at least 30 day



Subawards and Contracts

EPA has posted a [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) as guidance for other recipients and subrecipients of states. It includes advice on how to comply with EPA's 40 CFR Part 33 rule on Participation by Disadvantaged Business Enterprises in United States Environmental Protection Agency Programs.

Micro Purchase

may be made without competition (generally, for purchases of supplies)

Simplified Acquisition

should obtain prices/quotes from at least 3 sources

Formal Competitive Requirements

subject to formal competitive requirements and must obtain Competitive Sealed Bids or Competitive Proposals

Up to \$10,000

Up to \$250,000

More than \$250,000

PROCUREMENT THRESHOLDS



Sole Source

As provided at [2 CFR 200.320\(c\)](#), there are specific circumstances in which noncompetitive procurement can be used, including when one or more of the following circumstances apply:

- The item is available only from a single source;
- Public exigency or emergency;
- The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request; or
- After solicitation of a number of sources, competition is determined inadequate.

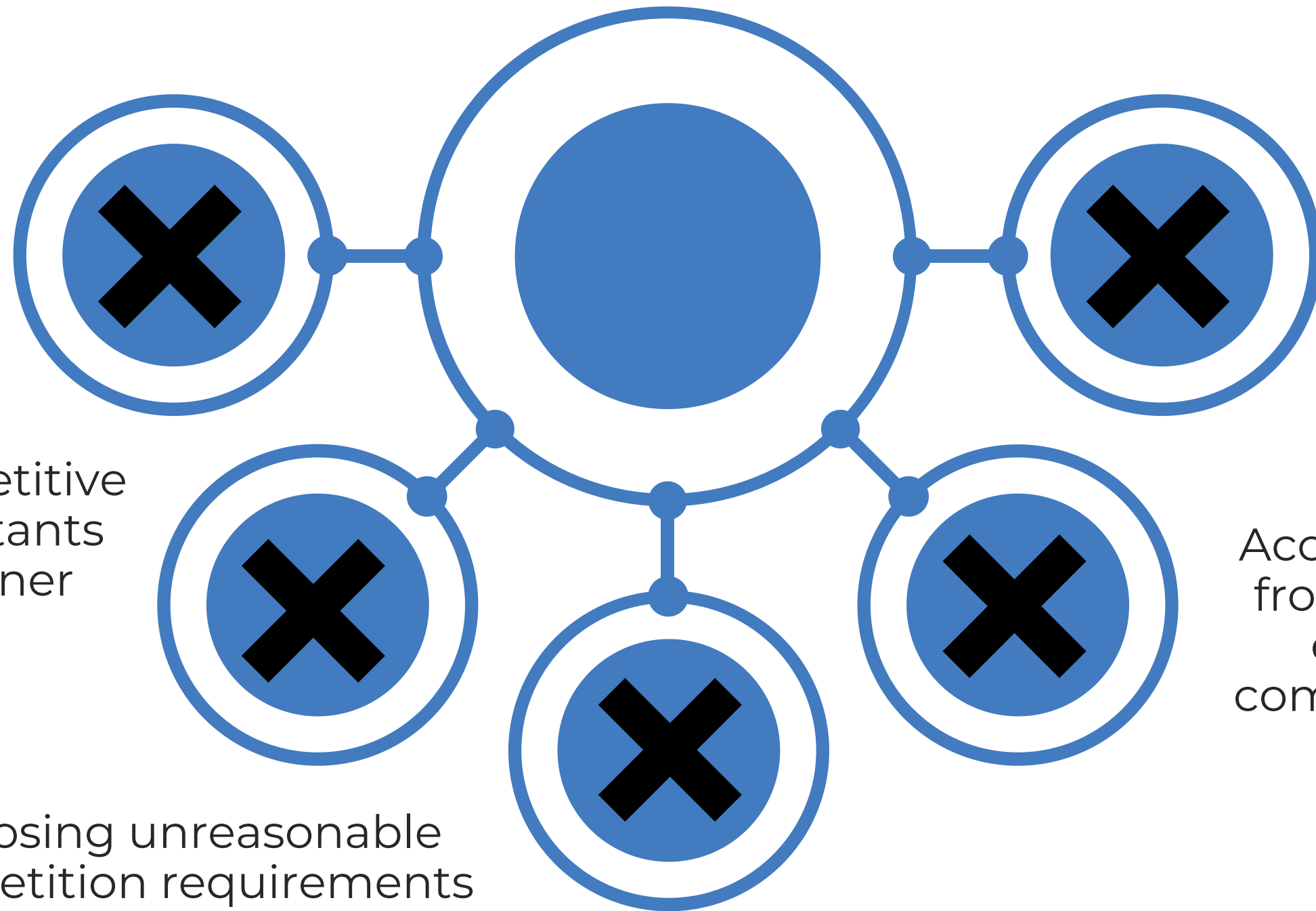


Sole Source

- EPA's position is that "sole source" procurements are justified by copyrights, patents, equipment maintenance agreements with manufacturers or similar arrangements.
- Arguments for sole source procurements for services such as consulting, project management, information technology support, or other things that may be procured in the commercial marketplace from multiple sources based on a proposed contractor's "unique qualifications" will not be accepted by EPA.

Improper Procurement Practices

Using sample language or templates from contractors planning to bid on the services



Discouraging other contractors from submitting an offer by naming firms

Making noncompetitive awards to consultants that are on retainer contracts

Accepting any assistance from a contractor if that contractor plans to compete for the resultant contract

Imposing unreasonable competition requirements



Consultant Fees

- 2 CFR 1500.10 caps the amount of compensation for individual consultants that a recipient may charge to EPA agreements to **Level IV** of the Federal Executive Level.
- When the cap applies depends on whether the recipient selects, directs, or controls the consultant along the same lines as an employee.



Participant Support Costs

- Common examples include travel assistance and stipends for trainees and incentives to participate in community meetings (including childcare).
- EPA expanded the definition of participant support costs in [2 CFR 1500.1](#) to include rebates and subsidies for the purchase of pollution control equipment (e.g. low-emission wood stoves, indoor air filters) as well as subsidies to promote participation in environmental stewardship programs.

Requesting Payments

- EPA makes payments for grants through the Department of Treasury's Automated Standard Application for Payments (ASAP), electronic payment system.
- Drawdowns should be based on actual costs incurred (e.g., payroll, payment of contractor invoices) rather than estimates or “even” amounts each month or week based on anticipated cash flow.



Requesting Payments

EPA's General Terms and Conditions require that recipients disburse substantially all funds they have received in response to a payment request within 5 business days of EPA's ASAP transfer of funds to the recipient's bank account.

Recipients do not have to pay staff, contractors, or subrecipients before drawing down.



Closing

8



Key Points

Check for Eligibility

- We know the NOFO is long but read it carefully!
- Make sure you meet the partnership eligibility requirements ([Section III.A](#))
- Make sure you meet all the applicable threshold eligibility requirements or your application may be deemed ineligible ([Section III.D](#))

Understand the Requirements for Different Tracks

- There are different requirements and evaluation criteria for Track I and II applications ([Sections IV.B](#) and [V](#))
- Note the readiness requirements for Track I so you can begin performance quickly upon award
- Alaska Tribal and U.S. Southern Border target investment areas have unique requirements ([Section II.B](#) and [Appendix H](#))
- Understand the post-award and other requirements ([Section VI](#))



Key Points

Triple Check Your Application

- Make sure you do not exceed the page limits for the Project Narrative portion of the application package and other attachments ([Section IV.B](#))
- Include all applicable attachments and forms to the application package ([Section IV.B](#))
- Make sure your project narrative addresses all the evaluation criteria, depending on if you are applying for Track I or II ([Section V](#))



Key Dates

Date	Event
November 2023	Applications Open
March 2024	Initial Award Selections
May / June 2024	Anticipated Start of Period of Performance for Initial Selections
November 2024	Applications Close

Contact us at CCGP@epa.gov with any questions. Please also check the [website](#) for additional webinar information and frequently asked questions.



NOFO Application Development



Find partners and build coalition



Identify meaningful transformative projects to address environmental and climate justice concerns that can be completed within 3 years ← (Track I)



Identify governmental policies and programs that can be improved with community voices (Track II)



Register on **SAM.gov** and **Grants.gov** *now* (this process can take up to a month)



You can follow up with questions at **CCGP@epa.gov**



Stay up to date on webinars by signing up for EPA EJ listserv by sending a blank email to **join-epa-ej@lists.epa.gov**



NOFO Appendices:

- A. Definition of Disadvantaged Communities and Mapping Requirements
- B. Partnership Agreement between the Lead Applicant and Statutory Partner
- C. Climate Action Strategies and Associated Project Activities
- D. Pollution Reduction Strategies and Associated Project Activities
- E. Job Quality & Equitable Employment Opportunities
- F. Track I & II Outputs and Outcome Examples
- G. Program Budget Template
- H. Alaska Tribal Lands Target Investment Area

Questions?

9





COMMUNITY CHANGE GRANTS

Environmental and Climate Justice

U.S. Environmental Protection Agency

For more information, please contact CCGP@epa.gov.