

SUPPORTING STATEMENT A

Title: Environmental and Climate Justice Community Change Grants Program: Post-Award Reporting

OMB Control Number: 2035-NEW

EPA ICR Number: 7781.01

1. Necessity of Collection

Overview

The U.S. Environmental Protection Agency (EPA) makes competitive financial assistance awards to support projects that tackle environmental, public health, and energy challenges across the country. Historically, these investments have not reached communities and groups who are overburdened by the effects of pollution, environmental hazards, and climate change. While these communities often have the vision and plans to overcome their local challenges, they can face systemic barriers that limit their access to resources that are needed to implement and deliver these solutions.

The Inflation Reduction Act (IRA) created the Environmental and Climate Justice Block Grant Program (ECJP)—the largest investment in environmental and climate justice in U.S. history—when it was signed into law by President Biden on August 16, 2022. The ECJP is now contained in Section 138 of the Clean Air Act (CAA), 42 U.S.C. § 7438. Under this program, EPA was provided \$2.8 billion to award grants to help disadvantaged communities address a wide range of environmental and climate justice issues, and \$200 million for technical assistance related to these grants. This historic investment advances [Executive Order 13985](#), *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, which established a whole-of-government approach to advancing equity and opportunity, and [Executive Order 14008](#), *Tackling the Climate Crisis at Home and Abroad*, which created the government-wide [Justice 40 Initiative](#) that established the goal that 40 percent of the overall benefits of certain federal investments flow to disadvantaged communities. Awards under the ECJP also support core goals of [Executive Order 14091](#), *Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, and [Executive Order 14096](#), *Revitalizing Our Nation’s Commitment to Environmental Justice for All*.

The Environmental and Climate Justice Community Change Grants Program (Community Change Grants) are the final and most comprehensive piece of EPA’s implementation of ECJP IRA funding. The Community Change Grants will complement grant programs that EPA launched in 2022 and 2023, including the Collaborative Problem-Solving Program, Government-to-Government Program, and Thriving Communities Grantmaking Programs. Collectively, these programs will empower communities and their partners to design, develop, and implement multi-faceted, community-driven projects. These programs will address the diverse and unique needs of disadvantaged communities by, among other things:

1. Monitoring, preventing, and remediating pollution across all environmental media;
2. Building resilience to climate change and mitigating current and future climate risks;
3. Enhancing meaningful involvement in government processes related to environmental and climate justice;

4. Expanding access to high-quality jobs and economic opportunity through workforce development in occupations that help reduce greenhouse gas emissions and other air pollutants and;
5. Bolstering community strength by ensuring that local residents receive the benefits of investments in low- and zero-emissions technologies and related infrastructure and have the opportunity to build on them for current and future generations.

Track I projects will make intensive place-based investments with strong collaborations to build climate resilience and reduce pollution in disadvantaged neighborhoods. These projects will address specific, community-driven environmental justice challenges and will center meaningful community engagement in order to build immediate and longer-term community strength and economic prosperity.

Track II projects work to break down systemic barriers that limit community participation in government processes around environmental and climate justice. Projects will create engagement and feedback mechanisms between community members and government decision-makers. These projects focus on ways to provide disadvantaged communities with information about issues that directly impact them, while simultaneously creating mechanisms to ensure that community needs inform government decision-making. Grantees in this track will strive to enable communities to play a meaningful role in making and implementing decisions.

The information requested under this ICR will be collected via post-award reports submitted by Grantees that document their planned and actual milestones, activities, target audiences, outputs, outcomes, timelines, and locations of activities or benefits. These reports include Workplans, Progress Reports, and Final Reports.

Legal and Administrative Requirements

The collection of information to assess and manage financial assistance programs fulfills various legal and administrative requirements:

1. *EPA's general regulation for financial assistance programs* establishes the minimum management requirements for recipients of EPA's financial assistance programs. The reports submitted by the Grantees under this ICR fulfill the information collection and reporting requirements included in EPA regulations 2 CFR Parts [200](#) and [1500](#).
2. The *Government Performance and Results Modernization Act of 2010 (GPRM-Mod)* requires agencies to set goals, measure performance against those goals and report publicly on progress. As a mechanism to achieve this goal, agencies must build and publish an Annual Performance Report (APR), which includes measurable goals, targets, and actuals from the prior fiscal year for all EPA programs. EPA publishes the APR each year alongside the Congressional Justification submitted to the Office of Management and Budget (OMB). Aggregated performance information collected for the Community Change Grants via reports from Grantees will be included in the APR.
3. The *Digital Accountability and Transparency Act of 2014 (DATA Act)* requires the federal government to transform its spending information into open data, and link federal contract, loan, and grant spending information to federal programs to enable more transparent public examination of federal spending. To enable public scrutiny of federal investments, EPA will need

to collect information from Grantees about the location of each funded activity and its associated place of performance.

4. [Justice40](#) is a whole-of-government initiative launched by the Biden-Harris Administration in 2021 representing a commitment to direct 40% of the overall benefits of certain Federal investments to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. As per [OMB Guidance M-21-28](#), EPA programs that are covered by this initiative are required to report: (1) investments that go to disadvantaged communities; (2) program outcomes and benefits for disadvantaged communities; and (3) community engagement and stakeholder consultation with disadvantaged communities and their partners. To fulfill the reporting requirements regarding the location of investments and benefits, EPA must collect information from each Grantee about the location of each funded activity and its area of impact, at the appropriate and feasible level of specificity.
5. The *Foundations for Evidence-Based Policymaking Act of 2018* ([Evidence Act](#)) provides a federal framework for agencies to work with stakeholders to promote a culture of continuous learning, and decision-making using the best available evidence. This legislation requires agencies to (1) produce measures and indicators; (2) use data to improve day-to-day operations; (3) advance the rigorous use of evidence as a routine part of planning and budget development; and (4) incorporate evidence in decision-making and reporting. Information collected for the Community Change Grants via the methodologies covered by this ICR—including post-award reports submitted by Grantees and public outreach information collections—will help develop an evidence base to address the effectiveness, efficiency, and equity of the program’s activities. This evidence base, in turn, will address needs related to organizational learning, ongoing program management, performance management, strategic management, interagency and private sector coordination, internal and external oversight, and accountability.

2. How, By Whom, and For What Purpose Information is Collected

EPA will collect information from each Grantee across three post-award instruments: (1) workplans; (2) performance progress reports; and (3) final reports. EPA will use this information to verify that recipients are using Federal funds appropriately to comply with Federal requirements; assess the status of grant efforts; and track outputs and outcomes required for Federal reporting.

Workplans

The workplan will provide an overview of the Grantee’s plans across five categories of information:

1. Objectives, milestones, and priorities
2. Planned activities with expected timeframes, locations, target audiences, outputs, and outcomes, as applicable in each area of work pursuant to [EPA Order 5700.7A1: EPA's Policy for Environmental Results under EPA Assistance Agreements](#).
3. Program management (e.g., personnel/staff, workplan, timeline, partnerships, etc.)
4. Optional: Plans to take and securely store images of key activities and events

EPA will use the workplans for various purposes: (a) confirm that recipients have a feasible and appropriate plan for spending the funds; (b) identify and address potential risks for projects;

and (c) establish a baseline against which to track progress.

Progress Reports

EPA will collect quarterly progress reports from each Grantee for the duration of the funding period. This timeline was chosen based on the schedule along which progress on project activities can be documented and reported.

In line with Agency strategic goals, program objectives, and submitted workplans, each Grantee will be asked to provide seven categories of information in the progress reports that cover the specified three-month reporting period:

1. Objectives, milestones, and priorities
2. Accomplishments: Activities with associated timeframes, locations, target audiences, outputs, and outcomes, as applicable in each area of work
3. Summary of public outreach information collections (if applicable, and if not reported in Part 2):
4. Program management updates (e.g., personnel changes, fiscal information)
5. Schedule of noteworthy activities for next reporting period
6. Feedback or comments for EPA
7. Optional: Images of key activities and events

EPA will use these reports to determine progress in relation to the approved schedule and milestones during the project pursuant to [EPA Order 5700.7A1: EPA's Policy for Environmental Results under EPA Assistance Agreements](#). Tracking progress at regular intervals will enable EPA to identify and address issues in a timely manner, thus ensuring responsible stewardship of public funds and transparent accountability to the American public. Collection of the information will also facilitate the collection and dissemination of success stories and best practices in real time, thus contributing to learning and improvement across the Grantees within the program.

Final Reports

The final report will summarize each Grantee's work on the project during the entire period of performance, and the extent to which the work has met the project's objectives.

In line with Agency strategic goals, program objectives, and submitted workplans, each Grantee will be asked to report on seven categories of information in the final reports:

1. Objectives, milestones, and priorities
2. Activities with associated timeframes, locations, target audiences, outputs, and outcomes, as applicable in each area of work pursuant to section 7 of EPA Order 5700.7A1: EPA's Policy for Environmental Results under EPA Assistance Agreements: Summary of public outreach information collections (if applicable, and if not reported in Part 2).
3. Reflection on medium-term and long-term outcomes
4. Program management (e.g., personnel changes, fiscal information)
5. Feedback or comments for EPA
6. Optional: Images of key activities and events

EPA will use the final reports to assess and report the Grantees' performance relative to program objectives.

3. Use of Technology for Information Collections

With this ICR, EPA is seeking approval to require funding recipients to submit information via specified post-award reporting forms, which will substantially reduce the burden on respondents and EPA staff by collapsing what could be extensive written narratives into concise, specific data fields. This approach will also improve the accuracy of data collected by each grantee and the consistency of data collected across grantees. All forms will be completed and submitted electronically, via systems that are currently in development.

4. Non-duplication

This ICR requests authorization for the collection of information that is not currently collected and otherwise would not be collected. There is currently no mechanism for systematic post-award reporting and public outreach information collections for the Community Change Grants, with respect to the set of instruments and methodologies outlined in this ICR and the uses outlined in this ICR. EPA has determined that this information is not currently held by EPA or any other federal agency.

5. Impact on Small Businesses and Other Small Entities

EPA has considered whether to establish different reporting requirements for small businesses and other small entities and has decided to maintain consistent reporting requirements for all entities regardless of size, based on the following determinations:

1. Different reporting requirements among recipients will result in inconsistent data that may reduce the Agency's ability to oversee and report on program activities and results;
2. Different reporting requirements among recipients may create confusion about specific expectations for Grantees;
3. The burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and
4. The Community Change Grants Program is voluntary and Grantees who elected to enter into the cooperative agreements with EPA have determined that the expected benefits of participation outweigh any burden associated with preparing the responses.

EPA will assist Grantees with compliance against financial and program performance reporting requirements. EPA Project Officers will meet regularly with their designated Grantee and will document their questions and concerns; EPA staff will then determine the appropriate resources and support to address each issue.

6. Consequences of Non-Collection or Less Frequent Collection

EPA recognizes the importance of balancing the need for data collection efforts against respondent burden and costs. The quarterly progress reporting schedule set out in this ICR is consistent with the Agency's reporting schedule for financial assistance programs. As noted in 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, grantees are

required to report updates on their respective projects quarterly throughout the project's period of performance, followed by a final report at the completion of the project.

EPA has determined that the quarterly reporting schedule is necessary to adequately track awardee progress in completing the proposed activities, and to measure project outcomes (e.g., calculate the emissions reductions that are achieved through the grant). Less frequent collection would weaken EPA's ability to oversee and manage the Community Change Grants and to report up-to-date and accurate information on program activities and accomplishments.

If this information were not collected, EPA would have no mechanism for tracking and assessing the extent to which the Community Change Grants are operating effectively, efficiently, and equitably. This situation would leave EPA unable to fulfill its legal and administrative requirements to ensure responsible stewardship of public funds; rigorous evidence-based learning and improvement; and transparent accountability to the American public.

7. Special Reporting Requirements

Information collections for the Community Change Grants will be conducted in accordance with the Paperwork Reduction Act [4 U.S.C. 3501 et seq and Title 5 of the *Code of Federal Regulations* (CFR) section 1320.5(d)(2)] and will adhere to OMB's general guidelines for information collections. There are no known special circumstances that would require reporting on an alternative timeline or methodology.

The Grantees will not be required to report information to EPA more often than quarterly and will be provided the relevant forms and instructions at least 30 days in advance. The Grantees will not be required to submit more than an original and two copies of any document.

In conjunction with OMB's general guidelines at 2 CFR 200.334, grant recipients must retain all financial records, supporting documents, accounting books and other evidence of program activities for three years after submission of the final report. If any litigation, claim, or audit is started before the expiration of the three-year period, the recipient must maintain all appropriate records until these actions are completed and all issues resolved.

The Grantees will not be required to submit Confidential Business Information (CBI). If a participant feels that any information requested would be CBI, the participant may request that such information be treated as confidential. All confidential data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's *Security Manual* Part III, Chapter 9, dated August 9, 1976. Any claim of confidentiality must be asserted at the time of submission.

8. Federal Register Notice and Consultation

Federal Register Notice

In compliance with the 1995 Paperwork Reduction Act (PRA), any agency developing a non-rule-related ICR must solicit public comments for a 60-day period before submitting the ICR to OMB. EPA plans to issue public notice of this ICR on or before August 15, 2024 via the Federal Register (Docket ID: EPA-HQ-

OEJECR-2024-0235). EPA will consider these comments and summarize our response in the final ICR package that is submitted with the second Federal Register Notice and to OMB.

Consultations

EPA will directly consult with up to nine applicants to ask them specific questions about the burden associated with completing the data collection covered in this ICR. These consultations will include discussions concerning potential response problems, clarity of questions and instructions, and the availability of data. Recipient responses will form the basis of EPA's calculations of the burden hours and costs.

9. Payment or Gift to Respondents

Incentives are generally not appropriate for recipients of assistance agreements because they already have a preexisting relationship with the Agency. Incentives will not be provided for post-award reports or needs assessment surveys submitted by Grantees.

10. Assurance of Confidentiality

As noted above, EPA asks grantees to refrain from including any confidential business information (CBI) in their reporting. All confidential data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's *Security Manual* Part III, Chapter 9, dated August 9, 1976. Any claim of confidentiality must be asserted at the time of submission. Any personal information included in a request would be treated in accordance with the Privacy Act, section 14 of TSCA, and the Freedom of Information Act.

All data collected via these online forms will be stored in internal EPA IT systems that meet or exceed EPA's current policies and guidelines regarding security and privacy, including undergoing a Privacy Threshold Analysis, and where appropriate, completing a Privacy Impact Assessment Form to safeguard sensitive information such as personally identifiable information (e.g., name, contact information, etc.). Additionally, personal identifiers will not be used to retrieve specific information in these systems.

Data will be publicly reported in anonymous and aggregated form where necessary to protect Confidential Business Information (CBI) and Personally Identifiable Information (PII). Location identifiers will be used to fulfill federal reporting requirements (e.g., DATA Act, Justice40 Initiative) to document results in different geographic locations. EPA will follow best practices in stating the source of the data (e.g., grant progress reports) and the methodology used to collect the information (e.g., self-report).

11. Sensitive Questions

Questions about sensitive issues that are normally considered private (e.g., religious beliefs, sexual attitudes and behavior) will not be included in the information collections covered by this ICR.

12. Hour Burden and Costs – Respondents

Total Annual Hour Burden (across all instruments) = 18,133.33 hours

Total Annual Cost (across all instruments) = \$614,357.33

Post-Award Reports Submitted by Grantees

The Grantees incur a burden in the process of preparing, completing, and submitting performance information via workplans, progress reports, and final reports. EPA has used its best professional judgement to develop *preliminary estimates* of burden hours and costs for each instrument, as presented in Table 1:

Table 1: Estimated burdens and costs – Respondents					
Activity	1. Burden per Response (Hours)	2. Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Prepare, Complete, and Submit Workplan	20	\$678 (hourly = \$33.88)	510 (1 workplan x 170 Grantees x 3 years)	10,200	\$345,576
Prepare, Complete, and Submit Progress Reports	20	\$678 (hourly = \$33.88)	2040 (4 reports per year x 3 years x 170 Grantees)	40,800	\$1,382,304
Prepare, Complete, and Submit Final Report	20	\$678 (hourly = \$33.88)	170 (1 report x 170 Grantees)	3,400	\$115,192
6. TOTALS for all three years				54,400 hours	\$1,834,072
7. ANNUALIZED TOTALS per year				18,133.33 hours	\$614,357.33

EPA is undertaking consultations with relevant parties to determine the total cost burden for respondents to complete the information collection instruments. Final estimates for each instrument will be provided in the ICR package that is made available for the next public review.

13. Total Annual Cost Burden (not including hour burden)

EPA has used its best professional judgement to develop *preliminary estimates* of the total annual cost burden, as outlined below.

Capital and Start-Up Costs

There are no specified capital or start-up costs for Grantees to meet the CCG Program’s post-award reporting requirements, as each Grantee should already have the standard equipment (e.g., computer, relevant software packages) and infrastructure (e.g., work space, access to internet services) that is required to collate, store, and report the required information for the workplans, quarterly progress reports, and final report. No specialist equipment or infrastructure is needed to complete the post-award reports.

Operation and Maintenance and Purchase of Services

Grantees are not expected to incur any specified operation or maintenance costs in order to meet the Community Change Grants Program’s post-award reporting requirements. This is because they can use the standard equipment and infrastructure that they use for other aspects of their work in the organization; thus, the costs associated with operation and maintenance should already be included as standard items in their annual budgets.

EPA will estimate a total annual cost burden after consulting with relevant parties on the reporting framework. Final estimates will be provided in the ICR package that is made available for the next public review.

14. Annualized Costs to the Federal Government

Total Annual Hour Burden (across all instruments) = 1,530 hours

Total Annual Cost (across all instruments) = \$57,803.40

EPA incurs a burden in the process of reviewing and processing the information collected via post-award reporting instruments from the Grantees: workplans, progress reports, and final reports.

EPA has used its best professional judgement to develop *preliminary estimates* of burden hours and costs for each instrument, as presented in Table 2:

Table 2: Preliminary Estimates of Burden Hours and Costs – Federal Government					
Activity	1. Burden per Response (Hours)	2. Labor Cost per Response (Dollars)	3. Number of Responses (3 years)	4. Total Burden Hours (3 years)	5. Total Labor Cost (3 years)
Review and Process Workplan	5	\$189 (hourly = \$37.78)	510 (1 workplan/ workplan update x 3 years x 170 Grantees)	2550	\$96,339
Review and Process Progress Report	2	\$75.56 (hourly = \$37.78)	850 (2 reports per year x 2.5 years x 170 grantees)	1700	\$64,226
Review and Process Final Report	2	\$75.56 (hourly = \$37.78)	170 (1 report x 170 grantees)	340	\$12,845.2
6. TOTALS for all three years				4590 hours	\$173,410.2
7. ANNUALIZED TOTALS per year				1530 hours	\$57,803.4

EPA will estimate a total annualized cost to the federal government after consulting with relevant parties on the reporting framework. This cost estimate will include the quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

15. Reasons for Program Changes or Adjustments on Burden Worksheet

Not applicable

This is a new collection, and so does not involve any program changes or burden adjustments.

16. Uses of Information

Information collected under this ICR will be used to support Program and Agency activities in two ways.

1. Internal Decision-Making: Continuous Improvement and Evidence Building

EPA can use the collected information about project outputs and outcomes to track progress against program objectives, thus allowing for assessments of effectiveness, efficiency, and equity. Results will help EPA identify success stories as well as areas for improvement, which will inform internal discussions to develop evidence-based recommendations for best practices and improvement strategies within the program. In line with the [2018 Evidence Act](#), this evidence base will be used to inform and improve day-to-day operations and decision-making. The Agency's Office of the Chief Financial Officer provides resources and support to develop staff capacity to use information and data in this way.

2. Public Reporting: Accountability

To enable more transparent public examination of federally funded activities, the information collected under this ICR will be published in four ways:

- a) EPA will post aggregated summaries of the Grantees' performance (e.g., activities, outputs, outcomes) on its public websites.
- b) EPA will collate program-level information for inclusion in public reports, such as the Annual Performance Report mandated by the Government Performance and Results Act (GPRA) and annual reports on activities supported by supplemental funds (e.g., Bipartisan Infrastructure Law, Inflation Reduction Act).
- c) EPA will use the collected information to respond to requests for data and information from the Executive and Legislative branches.
- d) Each Grantee may periodically post aggregated summaries of their public outreach information collections on their public websites and/or in public reports.

Information will be reported in anonymous and aggregated form where necessary to protect Confidential Business Information (CBI) and Personally Identifiable Information (PII). Location identifiers will be used to fulfill federal reporting requirements (e.g., DATA Act, Justice40 Initiative) to document results in different communities. EPA will follow best practices in stating the source of the data and the methodology used to collect the information.

17. Approval for not displaying OMB Expiration Date

Not applicable

All instruments will display the expiration date for OMB approval of the information collection.

18. Exceptions to the “Certification for Paperwork Reduction Act Submissions”

Not applicable

EPA does not seek any exceptions to the topics for the certification statement identified in the “Certification for Paperwork Reduction Act Submissions.”