

# Annotated Application Outline

## U.S. EPA Environmental and Climate Justice Community Change Grants

**PREPARING TO APPLY:**  
This document is part of a series of tools for school districts created by a collaborative of non-profit partners and funded with generous support from Flu Lab.

This annotated outline pulls together information from different parts of the [Notice of Funding Opportunity](#) (NOFO) into the appropriate section of an application. It includes hints, guided questions, and tools to consult to assist in the preparation of the grant application.

We have written this document with every effort to maintain accuracy and alignment with the EPA's NOFO for this grant opportunity (version updated August 6, 2024). However, the EPA may release future updates, and we may have misinterpreted requirements. It is each applicant's responsibility to ensure that they have read and understand the requirements of the grant program and the application.

## BEFORE YOU BEGIN

We recommend consulting two documents alongside this annotated outline. The [Application and Submission Information](#) document should be read first to ensure that you have access to the accounts you will need to submit the application. The [Grant Writing Tips](#) document contains tips specific to this grant application (what to take care of first, for instance), as well as general best practices.

## HOW TO USE THIS DOCUMENT

This annotated outline uses the original language of the NOFO and contains several additional kinds of content for you to use as you create your proposal.

- **TIPS:** Boxes on the side of the document will give ideas and pointers that applicants will want to consider in each section.
- **SUGGESTED TOOLS:** Boxes on the side of the document will give ideas for where to locate information you can use in the section.
- **GUIDING QUESTIONS:** At the beginning of some sections, a subsection with guiding questions has been added. Use these questions to organize your thoughts to include the most relevant and compelling content for that section.
- **DATA LIBRARY REFERENCE:** We have created a separate document, which we call the "Data Library" that contains case-making data and language for you to use in your proposal. You will see a circular badge with "DL" inside in places where you may want to consult the Data Library.



## PROJECT NARRATIVE – 20 page maximum

Track I applications include a Project Narrative with two sections, (A) Executive Summary and (B) Project Workplan.

- Section A. Executive Summary – 3 page maximum

**GUIDING QUESTION:** Does the information in the Executive Summary align with the information in the rest of the application?

The Executive Summary should contain the following elements:

- Application Title
- Name of the Lead Applicant.
- Name of the Statutory Partner.
- Contact Information: Include a name, title, email address, and phone number for key personnel for the Lead Applicant and Statutory Partner.
- Eligibility: Describe how the Lead Applicant and Statutory Partner meet the eligibility requirements in Section III.A of the NOFO
- Climate Action Strategy
- Pollution Reduction Strategy
- Grant Award Period and Completion: Provide estimated beginning and ending dates for the period of performance for your proposed grant.
- Amount of EPA Funding Requested
- Target Investment Area: If the application is for a Target Investment Area, as defined in Section II.A, please identify which one. If the application is not for a Target Investment Area, put N/A.
- Disadvantaged Community to benefit from the projects: Identify and describe the disadvantaged community, as defined in Appendix A, intended to benefit from the projects in the application.
- Other Sources of Funding: Briefly explain whether funding for the projects in your application is available under the Infrastructure Investments and Jobs Act (IIJA), other IRA programs, or other funding streams; and, if so, your reasons for seeking funding for these projects under this NOFO. Please also note the Duplicate Funding clause included in Section IV of the EPA Solicitation Clauses.
- Resubmission Status: Specify if the application is for a resubmission of a previously submitted and reviewed application.

### TIPS

Write the Executive Summary after the other parts of the application and attachments are completed to ensure that it is an accurate summary.

- Section B. Project Workplan – 17 page maximum

The Project Workplan is in three parts; the first describes the community-led aspects of the plan, the second describes the capabilities of the applicant team, and the third describes the feasibility of the project plan.

## **PART 1. COMMUNITY-DRIVEN INVESTMENTS FOR CHANGE (80 POINTS)**

- 1.1 Community Vision Description (10 points)

**GUIDING QUESTIONS:** How does this project fit into the overall community problems, issues, plans? What community data or input has led to the selection of the Climate Action and Pollution Reduction Strategies? Will the grant improve the community, and how?

- Community Description

Provide an overview of the Project Area including its resources, assets, and characteristics.

- Describe how the boundary of the Project Area was determined.
- Demonstrate how the project activities in the Project Area are designed and focused to provide impactful benefits to the residents of disadvantaged communities in the Project Area as defined in Appendix A.

- Community Challenges

Describe the needs and challenges the Project Area is facing, including climate impacts, climate change risks/exposures, and/or localized pollution.

Describe the impact these challenges have on the residents of the disadvantaged communities in the Project Area and particularly on priority populations within the Project Area who are acutely exposed to and impacted by climate, pollution, and weather-related threats, and/or who exhibit acute vulnerabilities or susceptibilities to the impacts of environmental pollution.



### **TIPS**

Information from the attachments may be pertinent to sections within the project workplan. Before writing the workplan, define the specific project and the Project Area, and complete the Project Area Map.

Before diving into the sections of the workplan, start with a short introductory paragraph that introduces the partners, geographic location, project type, and the overall expected results.

### **TOOLS**

Use the written objectives of the EPA Community Change Grant, listed in Section IA of the NOFO.

Use statistics about your community:

- Average income
- Median or average age of residents
- Education levels
- Health data for the Project Area

Include reference to any previous actions, statements, or plans that show your school district's commitment to the topics of climate action and/or pollution reduction.

○ Community Vision

Community Vision: Articulate an overall vision for the impact and benefits the grant would have on the Project Area in the near and long term, including:

- reducing and preventing pollution,
- building resilience to climate change and mitigating current and future climate risks; creating high-quality jobs and expanding economic opportunity through workforce development; and
- bolstering Project Area strength by ensuring that residents of the disadvantaged communities in the Project Area receive the benefits of investments and can build on them for current and future generations.



○ 1.2 Selected Strategies (45 points)

Applications must address at least one Climate Action Strategy and at least one Pollution Reduction Strategy. Accordingly, applications should address the following requirements:

○ Strategy Overview

- Provide an overview of the strategy and associated projects and describe how they will be implemented during the grant term.
- Describe how the strategies and associated projects in the application are integrated and/or designed to complement each other to provide impactful benefits to the residents of disadvantaged communities within the Project Area.
- Explain how the amount/proportion of the requested funding was determined for each strategy and associated project in the application.

○ Climate Action Strategies

Describe how the project(s) associated with the Climate Action Strategy(ies):

- Will address the climate impacts, risks, and / or challenges facing the Project Area and especially the residents of disadvantaged communities within the Project Area as defined in Appendix A;
- Will decrease GHG emissions within the Project Area and increase the overall resilience of the Project Area to current and anticipated climate impacts; and
- Are responsive to the Project Area needs and challenges identified in the Community Vision Description.



*Note that the non-profit partnership that is providing these tools to help school districts apply for funding is focusing on Climate Action Strategy 3: Energy-Efficient, Healthy, and Resilient Housing and Buildings.*

- Pollution Reduction Strategies

Describe how the project(s) associated with the Pollution Reduction Strategy(ies):

- Will address the localized pollution challenges facing the Project Area and especially the residents of disadvantaged communities within the Project Area as defined in Appendix A;
- Will make substantial and measurable (i.e., quantifiable) progress towards preventing, reducing, and / or mitigating existing and future sources of pollution to benefit the Project Area; and
- Are responsive to the Project Area needs and challenges identified in the Community Vision Description.

*Note that the non-profit partnership that is providing these tools to help school districts apply for funding is focusing on Pollution Reduction Strategy 1: Indoor Air Quality and Community Health Improvements.*

- 1.3 Community Engagement and Collaborative Governance Plan (15 points)

The Project Workplan will contain a short version of the full plan, which is explained below, in the section on “Attachments.”

- 1.4 Community Strength Plan (10 points)

The Project Workplan will contain a short version of the full plan, which is explained below, in the section on “Attachments.”

## **PART 2. PROGRAM MANAGEMENT, CAPABILITY, AND CAPACITY (35 POINTS)**

- 2.1 Performance Management Plan, Outputs, and Outcomes (6 points)

**GUIDING QUESTIONS:** What are your identified outputs and outcomes? How will they be tracked? What is the experience of the district and partners in program evaluation? If none, indicate that you will hire external evaluators to help the project team understand whether objectives have been met.

- Describe the environmental results of the proposed project.
- Describe how the recipient plans to track and measure project performance.
- Describe how the recipient selected the expected outputs and outcomes and how they will lead to improvements to the environmental conditions and public health of the community members of the Project Area in the short and long term.

### **TIPS**

Use Part 2 of the workplan to prove to EPA that you and your partners can manage and complete the grant project and that it will benefit the Project Area.

As referenced in Part 2.4, develop a project milestone chart early in your process and refer to it often within your grant proposal. Being consistent with these details will show evidence of your capacity and management.

- Describe how the expected project outputs and outcomes are specific and include achievable and reasonable target measures within the project period.
- Describe how the recipient will conduct program evaluation activities.

■ 2.2 Project Linkages to the EPA Strategic Plan (4 points)



Applications should describe how the proposed project activities support and advance EPA Strategic Plan Goal 2 (Take Decisive Action to Advance Environmental Justice and Civil Rights), Objective 2.1, (Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, and Local Levels).

**TOOLS**

Use language from the [EPA's Strategic Plan](#).

■ 2.3 CBO Experience and Commitment (5 points)

**GUIDING QUESTIONS:** Who are the partners? What tasks are they performing? Why did you choose them? What is their experience in undertaking the work they will perform in the grant (and any examples)?

Applications should describe the following for the community-based non-profit organization (CBO) that is part of the project, whether they are the Lead Applicant or Statutory Partner for the proposed grant.

**TIPS**

Don't forget to include an IRS determination letter as an attachment, proving the CBO is a non-profit.

- Their history and experience as a CBO
- The depth of their commitment, connections, and relationships with the disadvantaged communities the application is intended to benefit

■ 2.4 Programmatic and Managerial Capability and Resources (15 points)

**GUIDING QUESTIONS:** What systems do you have in place for tracking performance in this grant, both financially and programmatically (regular check-in meetings, progress reports, etc.)? What is each partner's strength and experience, communicated through their staff expertise? What staff roles and expertise will you be using?

Applications should provide information demonstrating the Lead Applicant's and Statutory Partner's ability to successfully complete, oversee, and manage the award including:

- Their organizational experience and capacity related to performing the proposed projects or similar activities (e.g., experience in managing projects and activities like those in the application).
- Their resources, capacity, capabilities, staff (e.g., project manager and other key personnel),

**TIPS**

EPA will be assessing your ability to complete the proposed work in a responsible manner. Resumes are not required for the staff referenced in this section, but be as specific as possible in describing their experience and capabilities.

Use information about both the people involved AND the controls in place to tell the story of your team's capabilities to EPA.

expertise, and skills to perform and manage the award activities effectively during the three-year award period.

- Their financial stability, controls in place, and capacity to manage taxpayer dollars ethically and efficiently as well as the policies and controls to be in place for project oversight and to manage program risk. This includes controls to identify waste, fraud, and abuse, and reduce the potential for waste, fraud, and abuse, by including plans and policies for program oversight, including confidential reporting (e.g., whistleblower protections), and risk management.
- A projected milestone schedule for the proposed projects (up to three years) with a breakout of the project activities into phases with associated tasks and timeframes for completion of tasks, including the approach, procedures, and controls for ensuring that the award funds will be expended in a timely and efficient manner while ensuring that costs are eligible, reasonable, and allowable.

■ 2.5 Past Performance (5 points)

Describe federally funded and/or non-federally funded assistance agreements (assistance agreements include grants and cooperative agreements but not contracts) that the Lead Applicant performed within the last three years (no more than three agreements in total). EPA agreements are preferred to be included.

- Describe whether, and how, the Lead Applicant was able to successfully complete and manage the agreements.
- Describe the history of the Lead Applicant in meeting the reporting requirements under the agreements including submitting acceptable final technical reports.
- Describe how the Lead Applicant documented and/or reported on whether progress towards achieving the expected results (i.e., outputs and outcomes) under those agreements was being made. If progress was not made, please indicate whether, and how, that was documented.

**TIPS**

Do not leave this section blank, even if you have never received a relevant Federal grant. Acknowledge lack of experience and emphasize your organization's and/or your partner's capabilities, using other projects and grants as evidence.

Failure to (1) provide any information about past performance on Federal grants, or (2) include a statement that you do not have any relevant or available past performance or reporting information may result in a zero score for these factors.



## PART 3. FEASIBILITY, SUSTAINABILITY, AND BUDGET (40 POINTS)

### ▪ 3.1 Readiness Approach (8 points)

Describe how grant performance will be initiated upon award, or generally no later than 120 days after award, leading to successful completion of the grant within the three-year period of performance.

### ▪ 3.2 Feasibility (9 points)

Demonstrate that all the projects in the application can be successfully and effectively performed within the three-year grant period of performance, and the degree of risk that they cannot be. This includes describing how the strategies and associated projects can individually and collectively be completed within three years.

### ▪ 3.3 Sustainability (5 points)

Demonstrate the extent to which the benefits and outcomes from the projects can be sustained after the three-year grant based on factors including, but not limited to, whether the applicant will leverage funding and/or resources from other sources to ensure the sustainability of the projects beyond the three-year grant term.

Describe an operations and maintenance approach, including plans and commitments to ensure there is continued funding available for operation and maintenance activities of infrastructure activities for the projects after the grant term is over (e.g., are there demonstrated commitments for continuing operation and maintenance funding/resources from the appropriate parties after the three-year grant term is over) including coordination with appropriate responsible parties.

### ▪ 3.4 Program Budget Description (8 points)

**GUIDING QUESTIONS:** Are the proposed costs reasonable and customary? Does the description explain each line item? Does the description match the budget form?

Provide a detailed budget description and estimated funding amounts for each project component/task, similar to that on the budget found in the SF-424A form, which includes the EPA funding requested to be expended over the three-year period of performance. This section provides an opportunity for a narrative description of the budget, or aspects of the budget, found in SF-424A.

In the description, explain how the budget is reasonable to accomplish the projects, and the cost-effectiveness of the budget in terms of maximizing the share of funds used for the delivery of benefits to disadvantaged

#### TIPS

Much of the content in Part 3 of the Project Workplan will also be covered in Attachment G (Readiness Approach) and Attachment H (Compliance Plan), but the NOFO asks you to summarize within the Project Workplan. You may want to write the Attachments first.

#### TIPS

Before you begin writing, create a budget table that includes all relevant categories (if helpful, use the EPA-provided template in Appendix G of the NOFO). Before you get too far, confirm:

- All included salaries
- Fringe (benefits) rate for the Lead Applicant

Explain anything that might appear out of the ordinary; for example, if construction costs are higher because of labor agreements.



communities (both the direct costs of funds passed through for financial assistance as well as associated indirect costs).

▪ 3.5 Compliance Plan (10 points)

Applicants must submit a Compliance Plan that describes how they will: (1) ensure compliance with the grant's terms and conditions, including [2 CFR § 200.302\(b\)](#) (financial management), [2 CFR § 200.303](#) (internal controls), and [2 CFR § 200.332](#) (requirements for pass-through entities); and (2) manage broader legal and compliance risks.

### TIPS

EPA provides a template budget table in the NOFO, in Appendix G. The NOFO indicates that there is no effect on scoring if the applicant does or does not attach a budget table. However, as this table does not count against the 17-page limit (whereas the "Budget Description" does), it is probably a good idea to include a table to clearly communicate the information you write in the "Budget Description." If you use a budget table, it will be uploaded as "Attachment A" with your application.

## FORMS AND ATTACHMENTS

### REQUIRED FORMS

- 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

### ATTACHMENT A: PROGRAM BUDGET TABLE

Use the template provided in Appendix G of the NOFO or create your own table.

### ATTACHMENT B: PARTNERSHIP AGREEMENT

All the partners must sign this agreement. The agreement should:

- List all the partners and the role they will play. Who will be the Lead Applicant, and who is the Statutory Partner?
- Clearly indicate who the Lead Applicant will be and who will undertake the actions required of a Lead Applicant. Required actions include the overall management, performance, oversight, and reporting responsibilities under the grant; making subawards to Collaborating Entities; and the receipt of federal funds from EPA and the proper expenditure of these funds. The Lead Applicant is also expected to bear liability for unallowable costs, be responsible for compliance and legal issues, and be responsible for managing risks associated with the project.

### TIPS

The Partnership Agreement is a legal document, signed by both parties, so your legal counsel will need to be involved.

The Lead Applicant is the entity that is responsible for the Compliance Plan (Attachment H).

- Describe the roles and responsibilities of the Lead Applicant and Statutory Partner for project activities (as described in work plan).
- Describe how disputes between and among the partners will be handled and resolved.
- Describe the procedures for replacing a Statutory Partner with another Statutory Partner and for ensuring the replacement has the comparable expertise, experience, knowledge, and qualifications of the replaced Statutory Partner to ensure successful grant completion within 3 years. (Replacement requires approval by an authorized EPA official.)
- Agreement of the Lead Applicant and Statutory Partner that, if the proposed application is selected for award, they will enter a subaward agreement that complies with the subaward requirements in the grant regulations at [2 CFR 200.331](#) and in [EPA's Subaward Policy](#) and related guidance and that contains terms and conditions, including those above.

### TIPS

Ensure that the responsibilities outlined for the Lead Applicant and Statutory Partner are consistent throughout the rest of the application.

Although you should draft this Agreement early to clearly articulate the expectations of the partnership for all parties, you may want to wait until later in the process to sign it, as there will likely be changes during the planning process.

## ATTACHMENT C

If applicable, an Indirect Cost Rate Agreement.

## ATTACHMENT D: PROJECT AREA MAP

For Track I, applicants must identify the specific census block groups designated as disadvantaged communities that the project(s) and supporting activities will directly benefit by submitting to EPA one contiguous Project Area Map with an outlined boundary.

Applicants should note that concentrated and compact Project Areas may maximize benefits to the residents of the census block groups designated as disadvantaged communities in the Project Area. Activities spread across a large Project Area may be more dispersed and less impactful to the residents of the census block groups designated as disadvantaged communities in the Project Area.

The Project Area Map should also reflect where each project submitted under the application is located within the Project Area. The Project Area may include multiple census block groups that are designated as a disadvantaged community by EPA (in Appendix A of the NOFO), but the disadvantaged census block groups need not be fully contiguous with each other.

### TOOLS

Use EPA's EJScreen Tool to create your map:

- Launch the tool
- Select "Place" at the top (blue icon)
- Select "Designated Disadvantaged Communities"
- Select "EPA IRA Disadvantaged Communities"
- Enter your location into the search bar at the top right

### TIPS

EJScreen has been updated since the NOFO was released. Make sure you are using version 2.3.

All projects and activities should be located within the Project Area, except in cases where the project must be located outside of the Project Area to address a localized pollution issue at the source.

While projects and activities may have an incidental benefit to census block groups (or other areas) that are not considered disadvantaged communities, the applicant must demonstrate that the projects' primary benefits will flow to disadvantaged communities in the Project Area.

The submitted map should include the following:

- The Project Area with an outlined boundary
- Main streets, landmarks, or both
- Community assets (e.g., parks or play areas, schools, community center)
- Jurisdictional boundaries, including incorporated and unincorporated areas
- Any other attributes that may provide important context about the Project Area

## **ATTACHMENT E: COMMUNITY ENGAGEMENT AND COLLABORATIVE GOVERNANCE PLAN**

### **– 10 PAGE MAXIMUM**

To help ensure that the community itself drives project development and implementation, applicants must submit a Community Engagement and Collaborative Governance Plan, which should demonstrate how the applicant will inform, respond to, and engage community members throughout project development and implementation. The plan should expand on the content written within the Project Narrative, described above.

This plan should include:

- Past Community Outreach and Engagement Conducted: The applicant should demonstrate what outreach and engagement methods were used to engage with the Project Area community, including any with specific neighborhoods or groups, and how this impacted the selection of the strategies and associated projects as well as the applicant's implementation approach.
- Community Engagement Plan Implementation: The applicant should demonstrate the specific community engagement methods, as well as how they will mitigate barriers and involve relevant governmental stakeholders, necessary to support overall implementation, including:
  - Clear Methods for Engagement and Transparency: The applicant should describe the following elements:
    - Outreach methods that provide opportunities for broad and diverse community member involvement in project development and/or

### **TIPS**

To strengthen the application, Collaborating Entities (the CBO partner and/or additional community partners) should bring with them the ability to engage with the target community. Specific letters of commitment from partners will strengthen the application further.

If you are choosing a project already in your pipeline, make sure you can demonstrate community involvement in determining the project location and scope.

This plan should outline outreach and engagement throughout the life of the grant, not just at the beginning.

Be as specific as possible about roles and responsibilities in the plan.

implementation and feedback during grant performance.

- Transparent mechanisms that will promote meaningful accountability to the needs and preferences of residents in the Project Area.
- Mechanism(s) that will be used to continuously inform the community before and during project implementation on project status, benefits available to them through the project, and indicators being tracked, such as air quality improvements or trees planted.
- Mitigating Barriers: The applicant should describe measures to minimize and mitigate barriers around community engagement and participation in project development and/or implementation including, but not limited to, those related to linguistic differences, communication challenges, disabilities, inaccessible technology, lack of trust or awareness, transportation, childcare, and elderly/adult care.
- Government Involvement: As applicable, the applicant should demonstrate the support and involvement of government agencies needed to facilitate successful grant performance. For example, projects that intersect with local government authorities such as permitting, planning, and zoning are encouraged to demonstrate the involvement and cooperation of these local government authorities.
- 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. The description should include, at minimum:
  - Outreach methods to solicit community representatives and processes to choose representatives to enable a broad cross-section of community representatives to participate so that different voices are heard.
  - An explanation of how the Lead Applicant and Collaborating Entities will coordinate with each other and community members to inform and engage the community on project development and progress.
  - An outline of the planned decision-making processes between the Lead Applicant and Collaborating Entities, including procedures to ensure that decisions are transparent and can be made in an expedited manner when necessary.
  - Processes for replacing a Collaborating Entity to ensure that the replacement entity has comparable skills, qualifications, expertise, community support, and experience to avoid any adverse impact on grant performance. EPA approval of the qualifications, expertise, and experience of the replacement Collaborating Entity will be required.

## ATTACHMENT F: COMMUNITY STRENGTH PLAN – 5 PAGE MAXIMUM

**GUIDING QUESTIONS:** Which organizations will you contact—or have you already consulted with—that operate within the Project Area and with the disadvantaged communities impacted? Are there other projects that are happening in the area that will also impact the community and partnership? If so, should those project owners be involved? How does this project relate, interact, and improve the community in which it is located?

Applicants must submit a Community Strength Plan that describes how their proposed projects will enhance the overall strength and economic prosperity of the community, including maximizing the benefits of the projects for existing residents and minimizing potential risks associated with investing significant resources into the Project Area. This Community Strength Plan should expand on the content written for the Project Narrative.

The plan should include:

- Maximizing Economic Benefits of Projects:

The plan should describe how the projects included in the application will maximize economic benefits for individuals in the Project Area, including priority populations. Examples of economic benefits could include:



- **Business Opportunities:** Applicants may need to hire contractors to carry out certain project activities. Applicants may consider partnering with their local government's small business office to broadly advertise contracting opportunities. Similarly, applicants should make a "good faith effort" to provide disadvantaged business enterprises (DBEs) with an opportunity to compete for contracts.
- **Job Opportunities:** Applicants may propose measures to facilitate the employment and retention of workers from disadvantaged communities on funded projects. For example, applicants may propose developing recruitment strategies in partnership with their local workforce development board; funding supportive services for workers on grant-funded projects (e.g., transportation, childcare, mental health supports), coordinating such services with local social service providers; or establishing goals for hiring individuals from disadvantaged communities on the projects and transparently tracking progress toward those goals.

Applicants may propose measures to increase community awareness of these job opportunities and the associated skill requirements, such as hiring workshops or job fairs. Applicants may also describe specific measures that will ensure Project Area residents are

### TOOLS

Economic data is important to the EPA. You may want to reference some of the community data used in the Community Description in your Project Workplan.

Other economic data to consider including may be:

- Expected number of jobs created by the work (refer to the Data Library)
- Economic benefits to the residents of the Project Area
- Economic benefits to small business owners in the Project Area

To strengthen the application's content related to strengthening the community, consider reaching out to:

- Local Chamber of Commerce
- Economic opportunity groups
- Local workforce organizations and/or unions

developing skills that are necessary to take advantage of existing or future jobs in professions contributing to the reduction of GHG emissions and other air pollutants.

- Financial Savings: If applicable, applicants may describe how and the extent to which Project Area residents will receive direct economic benefits from the Climate Action and Pollution Reduction projects, both in the short-term and in the long-term.

- Displacement Avoidance:

Benefits to disadvantaged communities can be evaluated by whether residents are able to retain the benefits of EPA-funded projects over the short and long-term. While climate action and pollution reduction can have a positive impact on a community, those benefits can also lead to unintended consequences, such as increased costs of living in a Project Area. Given that the purpose of Clean Air Act (CAA)§138 is to fund activities that will benefit disadvantaged communities, applicants should describe measures to increase the likelihood that existing community members of the Project Area will benefit from investments in both the immediate and long term.

Applicants should discuss potential short-term and long-term risks associated with the proposed projects to residents, small businesses, nonprofits, and other community members in the Project Area. Applicants should assess and describe the community's vulnerability to rising costs attributable to the proposed projects and assess potential impacts to households, small businesses, and other existing groups. Based on the specific risks identified, applicants should describe measures for mitigating those risks as applicable. Some measures can mitigate these displacement vulnerabilities in the short-term, whereas other measures can have long-term impacts.

Applicants can also describe how they will work with relevant entities, such as local governments, to create policies, plans, or programs to mitigate unintended impacts of the EPA-funded investments.

Applicants should describe any work already underway in the Project Area that would mitigate these risks, or existing policies, ordinances, or programs that are relevant. For example, an applicant could describe any ordinances in the Project Area designed to expedite construction or availability of additional affordable housing. Applicants can also describe any Climate Action and Pollution Reduction Strategies proposed as part of this application that might help mitigate displacement risks by providing project co-benefits, like job opportunities.

## TOOLS

Data to describe community stressors and risks will be hyper-local. Ideas include:

- Percentage increase in home prices in the area (National Association of Realtors)
- Percentage cost of living increase in the area
- Recent changes to the area's average median income level
- Major employers' movements in the area (employers coming or leaving)



## ATTACHMENT G: READINESS APPROACH – NO PAGE LIMIT

**GUIDING QUESTIONS:** What can go wrong? Why might problems occur, and what would the project team do to solve potential issues? Who will be responsible and what are the procedures for ensuring that the potential problems are addressed? Can potential problems be prevented to ensure that the work will get done within the grant period?

Applicants must demonstrate their ability and readiness to proceed with grant performance for the project(s) in the application upon receiving an award, and generally no later than 120 days after award, to ensure that the projects can be completed within the statutory three-year grant period. This Readiness Approach attachment should expand on the content written for the Project Narrative.

Within the plan, include items such as:

- Government Approvals: If government approval (e.g., construction permits) is necessary to implement or perform a project, the applicant must demonstrate that they have obtained such approval. If such approval has not been obtained, then the applicant must demonstrate how they will obtain it immediately after award, so it does not impede grant implementation.
- Federal Requirements for Construction Projects: 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 [Clean Air Act \(CAA\) § 314](#) and the [Davis-Bacon and Related Acts](#) prevailing wage requirement, the [Build America Buy America](#) domestic preference requirement, and other cross-cutting statutory and Executive Order requirements that apply to Federally funded construction projects.
- Alignment with Existing Plans: Applicants must demonstrate that the project(s) in the Project Area are consistent with any community development, climate resilience, or hazard mitigation plans, or other comparable government land use restrictions.
- Site Control: Applicants must demonstrate that they own or control the site where a project will be performed or that they will have legally binding access or permission to the site so they can perform the project(s).
- Operations and Maintenance: Applicants must describe their operations and maintenance plan and financing approach for their project's infrastructure investments, if relevant, which may include long-term service costs, fee structures, detailed indebtedness for all properties, and other relevant information demonstrating how operations and maintenance of the investment will be assured during and after the grant award.

### TIPS

EPA wants to know that the team has planned for the unexpected. The agency wants to ensure that the grant money will be used in the timeframe. Think ahead to potential problems, clearly describe them, and propose processes for overcoming issues when they occur.

## ATTACHMENT H: COMPLIANCE PLAN – 5 PAGE MAXIMUM

Applicants must submit a Compliance Plan that expands on the compliance plan described in the Project Narrative. The plan should describe how the Lead Applicant will:

- Ensure compliance with the grant's terms and conditions, including [2 CFR § 200.302\(b\)](#) (financial management), [2 CFR § 200.303](#) (internal controls), and [2 CFR § 200.332](#) (requirements for pass-through entities); and
- Manage broader legal and compliance risks associated with the project.

EPA's Technical Assistance Provider has created a [worksheet for applicants](#) to help them create a complete and thorough Compliance Plan. The worksheet includes specific questions related to financial management, internal controls, requirements for subawards. It also contains summaries of the legal requirements related to each aspect of the plan.

### TIPS

To strengthen this section, provide examples of the results of your organization's management controls, such as clean audits, external reviews, awards of excellence, etc.