

April 10, 2023

Michael S. Regan, Administrator
Office of the Administrator (1101A)
United States Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Request for Information on the Environmental and Climate Justice Block Grant Program (Docket ID No. EPA-HQ-OEJECR-2023-0023)

Dear Administrator Regan,

Thank you for the opportunity to submit comments for, The Environmental and Climate Justice Block Grant Program (ECJ Program) created under the Inflation Reduction Act (IRA). We appreciate the opportunity from EPA to respond to this request for information. The Center for Law and Social Policy (CLASP) is a national, non-partisan, anti-poverty organization that has advocated for policy solutions that support the needs of people with low incomes for over 50 years. We develop practical yet visionary strategies for reducing poverty, promoting economic opportunity, and addressing barriers faced by people of color. We work at the federal, state, and local levels to fight poverty and promote racial equity.

In the last several years, CLASP has strengthened our commitment to racial equity internally and externally, in all aspects of our operations, advocacy, and partnerships. Our responses to this RFI draw on our racial equity journey, including state and national policy advocacy, data analysis, and coalitions that center racial equity, as well as our deep commitment to connecting individuals with lived experience and expertise to policy design, implementation, and advocacy. We would be delighted to follow up on any aspect of these comments, including connecting federal officials to state and local partners and to individuals with lived experience.

CLASP applies a multi-disciplinary, cross-systems approach to eradicating barriers to access and imagining new policies, investments, and ways of thinking that center people with lived experience of benefits programs. We understand from our experiences in working with state and local leaders, activists with lived experiences, youth, young adults, and young parents that community engagement and racial equity are critical to any effort that seeks to advance the socio-economic mobility of individuals and families with low incomes. The suggestions below are drawn from specific CLASP partnerships with community voice in policy and program design. The three examples are:

The [Community Partnership Group \(CPG\)](#), a diverse collective of activists from across the United States who partner with nonprofits to ensure that their work is grounded in the wisdom and experiences of people directly impacted by anti-poverty policies (ex. Supplemental Nutrition Assistance Program (SNAP)). Each member of the CPG has developed their expertise through direct experience with public benefits programs whether it be participation or discriminatory exclusion--and ongoing advocacy to eliminate poverty within their communities. The CPG was convened by CLASP staff and independent consultants in the field who aimed to dismantle the transactional and often traumatizing relationship between anti-poverty nonprofits and people with lived

experiences of poverty. Staff and a consultant with lived expertise organically met CPG members at convenings, conferences and meetings and built intentional individual relationships with the members; eventually, the group convened together to build collective power and trust.

The Young Adult Engagement Strategy (YAES), built over the past three years as a way for CLASP to partner on an ongoing basis with youth and young adults. Through YAES, we have strengthened partnerships with and among young adult community stakeholders and youth-led organizations, which has helped CLASP develop a regular practice of incorporating young people in the development and implementation of our policy work. We have done this through partnership with youth development organizations and other partners, including young people in policy analysis and technical assistance, and through years of building trust and mentoring young people through workshops and co-creating materials. Our YAES work helped us lay the groundwork for our [New Deal for Youth](#) movement which is a youth-led, youth centered effort advocating for the creation of new systems, policies, investments, and structures that reimagine life for young people in America.

Community Driven Policies and Practices (CDPP) is a collaboration between CLASP's Income and Work Supports (IWS) and Youth teams, the Community Partnership Group (CPG), and youth activists. We refer to this group as the Core Collective. Together, the Core Collective is partnering with communities across the U.S. to (1) define "economic justice" from the perspective of people with lived experiences of poverty, (2) explore what policies they believe can deliver economic justice, and (3) co-design an advocacy plan to move policymakers toward change that is bold and restorative. Our project's guiding question is "What would it take to advance policies that deliver economic justice to your community?".

We respond to these questions posed in your post:

1. What should EPA consider in the design of the ECJ Program to ensure that the grants benefit disadvantaged communities?

For an agency to meaningfully engage with the individuals and communities that are most impacted—and have historically been traumatized by—benefits programs, policies, rules, processes, and operations, administrators must first acknowledge and research the racist history of these federal policies and their local implementation. Agency officials should engage in training to better understand the impact of systemic racism, implicit bias, and white supremacy to better understand current programs and regulations, as well as their origins. There should also be trainings to better understand the value and importance people with lived experience bring to conversations about policy and systems change. Only then can agencies begin to build trust within communities that have been historically excluded and/or discriminated against.

Community-based organizations, which often catalogue local histories and experiences and have earned community trust, can be strong partners in opening lines of dialogue between agencies and the people directly (or ideally) impacted by the policies they administer. It is critical that agencies seek out partnerships with organizations that are led by Black, Indigenous, Latinx, AA&NHPI, LGBTQ+, and immigrants, which have supported communities when the federal government and administering agencies have failed to do so, as well as provide adequate passthrough funding. These partnerships should be conducted with humility (rather than transactionally, as if communities owe the government something), to successfully build trust and create dialogue.

Once the relationship between administering agencies and community members has been built, agencies can formalize this process by investing in sustained stakeholder engagement throughout the entire program's lifecycle, from designing the program, to implementation, to evaluation. For community engagement practices to be properly designed and implemented, agencies should ask for consistent input from communities at every level of decision-making. It's important to not just use the stories of benefit recipients or view them as datasets, but

also accept their input on the decisions that will affect their lives. When building trust with communities, consistent engagement is critical.

A significant portion of the technical assistance funds should be provided up front, before applications are due for the programmatic funds, to support outreach and engagement in truly community-driven projects. EPA should also make data about both climate and environmental health hazards and demographic information accessible, usable, and inclusive for practitioners, families, and advocates, not just researchers, administrators, policy analysts, and policymakers.

Agencies should engage stakeholders and CBOs before grant opportunities are announced or awarded. Agencies should listen to community members when creating grants, focusing on simplifying the layers of grants, tailoring grants to actual community needs, and defining goals and objectives according to the community's definition of success.

2. Are there best practices in program design that EPA should consider in designing the ECJ Program to reduce burdens on applicants, grantees, and/or subrecipients?

EPA should create non-restrictive requirements related to who can participate and transparency about process, including the expected time commitment and compensation. EPA should ensure equitable access by accessing the technology and resources that leaders may have and filling in the gaps where necessary. Additionally, it is important to work in consultation with community members who specialize in engagement with people with lived expertise to build out the engagement model. It is important to also invest in Relationship building time to get to know one another using ice breakers or other tools. Lastly, it is important to remain flexible when plans change based on the guidance of community members.

Agencies should commit to simplifying applications and requiring less documentation; shortening applications; answering questions regarding reporting requirements and legal obligations, particularly for CBOs that work with undocumented populations; and improving language access. Materials should be made available in multiple languages, and plain language. But don't assume that written materials will be enough – people may need individualized support to weigh in.

Many of the parts of the federal grant application that are most challenging do not relate to the actual project proposal, but to procedural requirements such as obtaining a DUNS number, registering with the federal government to apply, and completing financial forms and compliance documents. As much as possible, these requirements should not be imposed on all applicants, but postponed until a preliminary selection of projects has been made. EPA should also provide applicants who reach this stage with technical assistance on the remaining steps needed to complete the grant award.

Funds should not be provided on a first-come, first-served basis, as smaller more community-based organizations will not be able to compete fairly. After an initial round of funding, projects serving communities that did not receive grants in the first round should receive priority.

While smaller CBOs should be allowed to apply for funds directly, CBOs should also be encouraged to apply for funds collaboratively, creating a network of community funding and support. Smaller CBOs may not have the same reach as larger organizations, but they do have trust and access to the specific communities they serve. Rather than asking one organization to effectively serve the needs of every community member, a network approach recognizes that multiple CBOs need sufficient funding for the entire community to thrive.

3. EPA is aware that applying for competitive Federal grants can be burdensome and that placing too much importance on written applications for projects to benefit disadvantaged communities may not be the best way

to help communities address environmental justice challenges. EPA is considering innovative techniques to replace portions of the written application process, such as an approach where EPA would invite applicants whose initial written application scored well to then provide a 30–60-minute oral presentation discussing predetermined questions or sets of issues. The purpose of the oral presentation would be to replace portions of the written application process to streamline the grant competition process and expedite the delivery of assistance for disadvantaged communities. What are your thoughts on this approach?

There is no perfect one size fits all solution to minimizing the burden of grant applications, so grantees should always have a choice between an innovative approach and the more traditional approaches. For example, an oral presentation may be a more challenging option for applicants who are not fluent in English, who live places where high-speed internet is not available, or for proposals from coalitions or partnerships where no single representative could fully speak for the project.

Eligible Projects

1. What types of projects should EPA focus on and prioritize under the five eligible funding categories in CAA Section 138(b)(2) listed below? Please also describe how the projects you identify would benefit disadvantaged communities:

- a. Community-led air and other pollution monitoring, prevention, and remediation, and investments in low-and zero-emission and resilient technologies and related infrastructure and workforce development that help reduce greenhouse gas emissions and other air pollutants (greenhouse gas is defined as “air pollutants carbon dioxide, hydrofluorocarbons, methane, nitrous oxide, perfluorocarbons, and sulfur hexafluoride”);**
- b. Mitigating climate and health risks from urban heat islands, extreme heat, wood heater emissions, and wildfire events;**
- c. Climate resiliency and adaptation;**
- d. Reducing indoor toxics and indoor air pollution; and**
- e. Facilitating engagement of disadvantaged communities in State and Federal advisory groups, workshops, rulemakings, and other public processes.**

We would like to highlight the importance of projects under category (e), Facilitating engagement of disadvantaged communities in public processes. Engagement in advisory groups, workshops, rulemakings, and other public processes are critical to addressing the root causes of environmental hazards, rather than simple ameliorating the harm that has already been done.

For centuries, Black and brown communities have been plagued and continue to be plagued by environmental racism. Black and brown communities are exposed to higher levels of air, noise, and water pollution and toxic substances such as lead, industrial chemicals, poisonous heavy metals, and pathogens. These communities are also more affected by natural disasters such as hurricanes, tornadoes, and wildfires, which are made worse by climate change. These communities experience environmental racism not by coincidence, but by design – industries often target minority and low-income neighborhoods for environmentally hazardous infrastructure, including hazardous waste facilities and pipelines. These communities are deemed “the path of least resistance.” Trainings, organizing, and mutual support help members of impacted communities lift up their own voices to fight back against these harms.

Facilitating engagement in public processes should be understood broadly as including supporting people impacted by toxins and climate hazards in sharing their own, their families’ and their communities’ experiences through a range of approaches, as well as in understanding the underlying causes of these threats, the public and private entities that are making decisions that affect them, and the ways that they can engage in the public processes. The projects supported under this section should also specifically facilitate directly impacted

communities participating in the processes that will decide how the billions of dollars of funding under the IRA and IIJA will be spent.

These activities should be funded both as standalone projects, and as components of all projects funded under other activities. Once grants are awarded, agencies should create advisory councils for each category of grant comprised of people engaged in all levels of the grant, including those with lived experience. Agencies should require grantees to join the stakeholder committee. The committee should meet regularly and provide ongoing feedback on supporting community needs.

Grant RFPs should also make clear that it is appropriate for projects to pay participants for their time engaged in both trainings and advocacy, as well as for expenses needed to participate including travel costs, meals, and child care, and to include these costs in their budgets. In addition, EPA should provide training to offices and state and local programs on best practices for truly engaging people from impacted communities in public processes, and hold them accountable for doing so in a meaningful way. Public engagement is too often a “check the box” exercise, with little impact on the ultimate outcomes. Administrators must co-create advisory boards, task forces, and commissions alongside community members from inception to implementation and beyond. Strategies for incorporating community input and participation from the beginning of a project include:

- Non-restrictive requirements related to who can participate and transparency about process, including the expected time commitment and compensation.
- Ensure equitable access by accessing the technology and resources that leaders may have, and filling in the gaps where necessary.
- Consultations with community members who specialize in engagement with people with lived expertise to build out the engagement model and design the outreach processes. Recognizing that there is no one size fits all approach, what are the right times, locations, or designs to get input. Traditional “town hall” meetings privilege those with time and comfort in public speaking.
- Include relationship building time to get to know one another using ice breakers or other tools.
- Flexibility when plans change based on the guidance of community members.

2. With respect to the workforce development activities under category 1(a) above:

a. Please describe what you perceive as the most significant challenges and barriers to connecting residents of disadvantaged, underserved, and under-represented communities to workforce opportunities related to addressing environmental justice and climate change, and what programs, services, and partnerships are needed to address these challenges and barriers.

For too long, the economy has only worked for a few. As a result of current and historic economic marginalization and exploitation, communities of color and those with low incomes, as well as others with marginalized identities, have been left out or left behind in building sustainable livelihoods. Millions of people work in jobs with low wages, few or no benefits or protections, and no pathways for career advancement. Women, people with disabilities, opportunity youth, and people impacted by the criminal legal system face especially egregious hiring discrimination and inequitable employment opportunities. Black, Indigenous, and People of Color (BIPOC) workers, youth, and young adults, and Latinx workers all experience disproportionately high unemployment. Building back requires solutions rooted in economic justice.

More than 9 in 10 Americans (93 percent) favor a national initiative that creates paid work and job training opportunities as part of recovery efforts. This policy solution—a federal investment in public service, or subsidized employment—is the only workforce intervention proven to put large numbers of unemployed people to work rapidly and put income in the pockets of those who need it most. Paired with training, worker supports, and pathways to growing quality jobs within emerging green and climate sectors, these investments can have

transformational impacts on workers, communities, and the environment. Strategies like the Civilian Climate Corps, which would be anchored in the U.S. Department of Labor, can combine the opportunity of green investments with federal subsidized and transitional jobs, which have been proven time and again to support pathways to employment for people who face structural barriers to employment. Such an initiative would put people to work in areas such as conserving public resources, advancing our communities' resilience to extreme weather events, and furthering climate justice.

At the same time, these jobs can help move people into economic security by providing living wages, benefits, and critical supports such as paid leave and predictable work schedules when paired with training, skill development, education, and other worker supports. This public service would ultimately benefit us all. A federal public service jobs program grounded in the green economy can deliver on federal decarbonization targets while investing in the economic empowerment of people in marginalized communities, a key step to redressing centuries of environmental racism. To get our economy on track, we need policymakers to invest in workforce solutions like subsidized jobs that are rooted in equity and intentionally reach the jobseekers who need them most.

b. What types of jobs and career pathways should EPA prioritize to support environmental justice and climate priorities?

A federal public service jobs program grounded in the green economy can deliver on federal decarbonization targets while investing in the economic empowerment of people in marginalized communities, a key step to redressing centuries of environmental racism. To get our economy on track, we need policymakers to invest in workforce solutions like subsidized jobs that are rooted in equity and intentionally reach the jobseekers who need them most. An equity-centered national subsidized employment program can support an inclusive COVID-19 economic recovery; increase job quality; expand access to green economy jobs; and lay the groundwork for a more fair, just, and prosperous economy and environment. A national public service employment program, including components tied to the green economy, is the right solution for today's economic and climate crises.

Eligible Recipients

- 1. Eligibility for the ECJ Program grants is limited to a partnership between a community-based nonprofit organization and an Indian tribe, local government, or institution of higher education; a community-based nonprofit organization; or a partnership of community-based nonprofit organizations.**
 - a. What is and how should EPA define a “community-based nonprofit organization” for purposes of implementing ECJ Program funding?**
 - b. What is and how should EPA define a “partnership” between a community-based nonprofit organization and an Indian tribe, local government, or institution of higher education for purposes of implementing ECJ Program funding?**

Key best practices for engaging CBOs and community members around equitable grantmaking include:

- *Paying advisory board members and recognizing them as experts.*
- *Regularly reporting back on the status of suggestions.* Implement community input or explain why it was not implemented and what alternatives are being considered. Soliciting and then ignoring feedback exacerbates lack of trust. It is not enough to listen to community members; their ideas must be acted upon.
- *Working to reduce bureaucratic hurdles when engaging those with lived experience.* Change arbitrary rules and ethical guidance that limit community members or prior grantees from participating in feedback conversations. Agencies should issue guidance promoting and encouraging community feedback and clarifying any rules that may be perceived as preventing participation.

2. What characteristics and attributes do you think are important to the formation of a “partnership” for purposes of implementing ECJ Program funding?

Federal grant applications hold immense power and can create incentives and encourage organizations to invest in the professional development of their staff, build capacity, hire BIPOC staff, focus on equity outcomes, and invest in addressing root causes of poverty.

CLASP held a listening session with [A New Deal for Youth Changemakers](#) who have experience working with federal grants or who work with small community-based organizations (CBOs) and mutual aid networks. Our Changemakers identified three key barriers to equitably accessing federal grants:

- *Awareness.* Many of our Changemakers work with organizations who have never completed a federal grant application because their organizations do not know what funding opportunities exist, where to find these opportunities, and if they qualify.
- *Capacity.* Many small to mid-sized CBOs do not have the capacity to complete applications. CBOs should not need grant writers to secure government funding. Instead, agencies should create applications that any staff member can reasonably complete, ensuring nonprofits do not gatekeep professional development and that staff members who work directly with communities can apply for funding, rather than relying on a grant writer who may not understand community needs.
- *Trust.* Many organizations will still choose not to apply because they lack trust in the federal government. CBOs will choose to distance themselves from investors (including government agencies) that are contrary to their values and harm their communities. To truly move towards equitable grantmaking, agencies must intentionally work to restore trust in communities, acknowledging that the lack of trust is well-founded.

Reporting and Oversight

3. What metrics should EPA use to track relevant program progress and outcomes including, but not limited to, how the grants benefit disadvantaged communities?

Agencies can move towards equitable grantmaking by adopting new definitions and metrics of success that focus on authentic community change. This includes:

- *Allowing communities to define success for themselves.* CBOs should provide their own metrics and data that they believe best emphasize equity outcomes and indicates program success, recognizing both quantitative and qualitative data. Definitions and metrics of success may differ from grantee to grantee.
- *Creating community-aligned objectives.* Agencies force CBOs to jump through hoops to meet objectives they believe are evidence-based but are not community-aligned. [Agencies should move away from a reliance on](#) random assignment studies as the sole criteria for evidence-based practices and towards a new understanding of evidence that is both data-driven and community-informed.
- *Focusing on root causes.* Agencies should evaluate whether grants have addressed the root causes of inequity, rather than surface-level solutions.
- *Requiring all grantees to design equity measures.*
- *Improving data tracking, including Tribal data.* Better data tracking requires data disaggregation across identities including racial and ethnic identities, nationality, and language. Once disaggregated, agencies can better understand which communities are not being served. Agencies can then be proactive by reaching out to the CBOs who serve those identities or even creating identity-specific grant opportunities.

- *Supporting capacity building and learning.* The evaluation process should be collaborative and used to strengthen grantees over time. Agencies should conduct strengths/deficits analysis on all grantees, but carry the deficits piece with explicit offers of support. For CBOs to be honest about their deficits, agency staff must establish trust with their grantees. The grantee’s honesty should not negatively impact future funding.

Technical Assistance

1. What types of technical assistance would be most helpful to the ECJ Program’s eligible entities to help those entities successfully perform the ECJ Program grants?

Agencies should provide free resources to bolster the capacity of CBOs and mutual aid networks, helping to close the equity gaps for organizations who cannot afford a grant writer. Examples of free resources include:

- Regular workshops and office hours.
- Pro-bono grant writers who can help CBOs with their application process.

EPA should also provide grantees with free materials to use and adapt in their programs, including mapping software and training in its use, and curriculum for helping participants understand the opportunities for public comment and how to engage.

An example of the types of resources that should be provided is the Policy 101 training developed by CLASP’s Youth Policy Team. This training was developed and implemented through facilitated workshops. These workshops are designed to demystify policy, introduce the concept of systems of power and their influence on policy, provide an overview of the basic elements of a policy agenda, and provide participants the opportunity to draft an advocacy strategy for an issue that they care about. A virtual self-paced asynchronous version of the Policy 101 workshops that includes virtual discussion boards, videos, online activities, and more is available at [this link](#).

General Comments

1. Besides the questions above, do you have any other comments on the design, structure, and/or implementation of the ECJ Program including your views on ways EPA can simplify the application process for applying for the ECJ Program grants?

Building Community Trust through Unrestricted Funds

There are currently three major challenges to building trusting relationships between community organizations and federal agencies:

- CBOs often need to jump through hoops to describe their work in the terms of a grant, rather than grants allowing them to use the funds according to community needs.
- Agencies tend to invest in band-aid solutions rather than looking upstream to address root causes, which can often lead to community members becoming even more reliant on government aid and services, exacerbating a lack of trust.
- CBOs must focus first on meeting basic needs, recognizing that they cannot produce positive outcomes unless basic needs are met; meeting these basic needs is often not an allowable cost under Federal grants.

To truly be equitable, federal grants must address both long-term thriving and immediate survival. Agencies can respond to these three barriers by:

- *Revising Federal guidelines that prohibit/limit spending on meeting basic needs* such as food and transportation and by trusting CBOs and mutual aid networks to spend grant funding according to community needs. All grants should include discretionary funding that can be used to meet basic needs, and grant applications should ask how organizations meet the basic needs of community members.
- [*Awarding multi-year unrestricted funding*](#). This shifts decision-making power from agencies to communities and builds trust by validating the work of CBOs and mutual aid networks. Unrestricted funding helps combat silos by recognizing that people do not lead single-issue lives and need a full range of support to thrive. Further, it allows communities to invest in long-term sustainable community-level changes.

Thank you for providing us the chance to respond to this RFI and we appreciate your commitment to and interest in advancing equity in the climate justice grant program. If you have any additional questions, please reach out to Priya Pandey (ppandey@clasp.org) or Elizabeth Lower-Basch (elowerbasch@clasp.org).

Sincerely,

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