

# JOB QUALITY AND COMMUNITY BENEFITS IN THE CLIMATE POLLUTION REDUCTION IMPLEMENTATION GRANTS: A USER GUIDE



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# INTRODUCTION

The Inflation Reduction Act—passed by Senate and House Democrats and signed into law by President Joe Biden on August 16, 2022—makes landmark investments across a host of sectors to tackle climate change and support the creation of good union jobs across the country. This includes a new program: the \$5 billion Climate Pollution Reduction Grant (CPRG) program at the U.S. Environmental Protection Agency (EPA) for states, municipalities, and Tribes to develop and implement plans to reduce greenhouse gas pollution.

This user guide is intended to support states and municipalities in crafting their applications for these implementation grants. The user guide can support applicants in understanding key components and criteria of the CPRG implementation grant application at the intersection between good jobs, a stable climate, a clean environment, and a fair and just economy. While this user guide provides a brief overview of all application criteria, it goes in depth on how to create high-quality jobs, engage communities, and develop community benefits (see Criteria #4 and #5 below).

CPRG funding is divided into two main components:

**1. Planning Grants:** \$250 million for states, territories, municipal governments, and Tribes to develop plans to reduce climate pollution. The Inflation Reduction Act directs EPA to make planning grants to at least one recipient in each state. Planning grants were awarded in the summer/fall of 2023. To see how much your state received, refer to the [EPA's list of planning grant awards](#).<sup>1</sup>

**2. Implementation Grants:** After reviewing planning grants, EPA will competitively award \$4.6 billion for the implementation of these plans. These funds can be used for a wide variety of projects, including electric vehicle (EV) charging infrastructure, public buildings, transit, natural infrastructure solutions, industrial decarbonization, and more. The application for these implementation grants is currently open, and applications are due in April 2024. We expect EPA to make awards in late spring/early summer 2024. EPA estimates that projects will begin around October 1, 2024.

The Climate Pollution Reduction Grant program is intentionally broad to support states, Tribes, municipalities, and territories develop and implement plans to reduce greenhouse gas (GHG) pollution in ways that make sense for their jurisdictions. In the CPRG's Implementation Grant [Notice of Funding Opportunity](#) (NOFO), the EPA lays out the goals of the program.<sup>2</sup> A strong applicant should ensure that these four goals are explicitly reflected in their implementation project proposal:



1. Implement ambitious measures that will achieve significant cumulative GHG reductions by 2030 and beyond;
2. Pursue measures that will achieve substantial community benefits—such as reduction of criteria air pollutants (CAPs) and hazardous air pollutants (HAPs)—particularly in low-income and disadvantaged communities;
3. Complement other funding sources to maximize these GHG reductions and community benefits; and
4. Pursue innovative policies and programs that are replicable and can be “scaled up” across multiple jurisdictions.

In addition to these four goals, applications should also meet the Biden administration's broader goal of ensuring investments translate into good jobs. The Biden administration laid out clear commitments to maximize the job quality, equity, and community benefits of this legislation and other federal spending through executive orders and initiatives. The president and his administration are seeking to deliver on their commitment to working people by advancing high-road labor standards and securing worker rights and protections. This is facilitated through multiple avenues such as [Executive Order 14063](#) on Project Labor Agreements (PLAs), the U.S. Department of Labor (DOL)'s [Good Jobs Initiative](#), and high-road labor standards and community benefits criteria in funding opportunities. To that end, the CPRG NOFO encourages applicants to work closely with labor unions and communities to build jobs and create tangible community benefits.<sup>3,4</sup>



# TIMELINE, AWARDS, AND ELIGIBILITY

## Timeline

CPRG Implementation Grant applications are due April 1, 2024. Applicants will be notified in July 2024 and awards disbursed October 2024. The EPA plans to award between 30 and 115 grants that range between \$2 million and \$500 million per award.<sup>5</sup> Lead organizations for CPRG planning grants must submit their Priority Climate Action Plan (PCAPs) to EPA by March 1, 2024, to be eligible to submit an Implementation Grant application.

## Awards

EPA established five tiers of grant ranges to reflect differences in the scope, scale, and cost of GHG reduction projects (see Table 1 for tiers and potential number of awards from [page 16 of the NOFO](#)). EPA will make awards to top ranked applications in each tier.

**Table 1: EPA's Five Tiers of Grants, Ranges, and Number of Awards<sup>6</sup>**

Tier	Grant Ranges	Funds Targeted for Each Tier	Anticipated Number of Grants to be Awarded
Tier A	\$200 million - \$500 million	\$2 billion	4-10
Tier B	\$100 million - \$199,999,999	\$1.3 billion	6-13
Tier C	\$50 million - \$99,999,999	\$0.6 billion	6-12
Tier D	\$10 million - \$49,999,999	\$0.3 billion	6-30
Tier E	\$2 million - \$9,999,999	\$0.1 billion	10-50

Data from [U.S. EPA](#).<sup>7</sup>

Given the small number of implementation grants compared to all of the states and metropolitan statistical areas (MSAs) that received planning grant awards, EPA is encouraging the formation of coalitions to apply for the implementation grants. Letters of Intent from each prospective coalition member must be included in the application. EPA is also looking for “shovel-ready projects” to show the impact of these funds in the near-term.

## Eligibility

Eligible applicants to apply for implementation grants are:

- lead organizations for CPRG planning grants;
- other states, municipalities, air pollution control agencies, Tribes, and territories that directly received a CPRG planning grant from EPA;
- and groups applying for funding to implement projects contained in one or more applicable PCAP developed with funding from a CPRG planning grant.

Entities that did not receive a planning grant can still apply, but their applications need to be based on projects included in the applicable PCAP that geographically covers the applying entity. EPA's [Questions and Answers document](#) contains more details about PCAPs and eligibility.<sup>8</sup>

Eligible projects accelerate decarbonization across one or more major sectors responsible for GHG emissions including industry, electric power, transportation, buildings, agriculture/natural and working lands, and waste and materials management. Potential projects may include, but are not limited to, programs to increase the share of EVs and EV charging infrastructure on the road; projects to facilitate new or expanded public transportation infrastructure; retrofit programs for commercial, residential, municipal, and public buildings including schools and hospitals; and programs to support decarbonization of industrial facilities such as those in the iron and steel, cement, aluminum, glass, and paper and pulp sectors. The Implementation Grant NOFO includes examples of eligible sectors and projects.

EPA will perform an initial review of applications to determine if they meet what the NOFO refers to as “threshold eligibility.” During this review, EPA will evaluate whether an application meets a list of eight eligibility criteria. You can view these criteria on [pages 21-22 of the NOFO](#).<sup>9</sup>



## APPLICATION EVALUATION CRITERIA

Applications that meet the threshold eligibility criteria discussed above will receive a more substantive review and evaluation. Each application will be given a numerical score and will be ranked by a review panel against other applications in the same funding tier (see Table 1). Within a 25-page limit workplan, applications will be scored for each criterion below based on the extent to which the response meets the content requirements and the quality of the response.

### Criteria #1: Overall Project Summary and Approach

#### *Description of GHG Reduction Measures and Transformative Impact*

One of the main goals of CPRG Implementation Grants is to reduce GHG emissions. Thus, EPA puts a [significant emphasis](#) on applicants showing how a project will reduce emissions.<sup>10</sup> In this section, applicants should:

- Provide a detailed description of each of the proposed GHG reduction projects to be undertaken;
- Describe the major features, tasks, milestones, and potential risks for each measure;
- In the case of a coalition application, describe the roles and responsibilities of each coalition member in the project design and implementation, and affirmatively declare that the lead applicant will submit a Memorandum of Agreement signed by all coalition members by July 1, 2024, or provide an alternative date and justification; and,
- Explain how each GHG reduction measure relates to a priority GHG reduction measure included in the relevant PCAP, why each measure was selected as a priority, and how each measure will meet the goals of the CPRG program.

Additionally, EPA expects applicants to **clearly [demonstrate](#)** how their GHG reduction proposal has the potential to “create transformative opportunities or impacts that can lead to significant additional GHG emissions reductions.”<sup>11</sup>

#### *Applicant Need*

To meet criteria #1, EPA also expects applicants to demonstrate a strong need for CPRG implementation funding that is unmet by other funding sources. Applicants should explain if and how they have explored the availability of other federal and state grants, tax incentives, and other funding sources to implement their greenhouse gas reduction projects and why these sources are not adequate. The application should include a list of federal and non-federal funding sources (e.g., EPA’s Greenhouse Gas Reduction Fund Solar for All program, the U.S. Department of the Treasury’s Direct Pay program) that the applicant has applied for and indicate whether they secured funding or expect to secure funding from those sources. If an applicant has secured partial funding, they should explain why CPRG funds are also needed. If applicants identified other funding sources but did not pursue those sources, EPA recommends that the applicant explain their reasoning.

The BlueGreen Alliance’s [User Guide to the Inflation Reduction Act](#) and [User Guide to the Bipartisan Infrastructure Law](#) can be helpful in finding and understanding funding opportunities.<sup>12,13</sup>

## Criteria #2: Impact of GHG Reduction Measures

### *Magnitude of GHG Reduction: 2025-2030 and 2025-2050*

In addition to a description of how entities plan to reduce GHG emissions, EPA will assess applications based on the magnitude of estimated GHG emission reductions over both the short and long term, including the need for lifecycle GHG reductions of natural and working lands. This is in keeping with Congress's intent for the program: to reduce near-term GHG emissions contributing to climate change.

EPA will evaluate applications against other applications in the same tier (as in Table 1), with EPA giving priority to geographic diversity of awardees; making awards that advance the Justice40 Initiative; provide GHG reduction projects in key sectors; and/or provide greater diversity in the types of entities receiving CPRG implementation funds.

### *Documentation and Cost Effectiveness*

EPA is also requiring that applicants demonstrate the cost effectiveness of the GHG reduction anticipated for the projects, as well as documentation of technical assumptions showing the reasonableness of GHG emission reduction estimates.

[Appendix C of the Implementation Grant NOFO](#) offers additional guidance for these technical calculations.<sup>14</sup>

## Criteria #3: Environmental Results—Outputs, Outcomes, and Performance Measures

### *Outputs and Outcomes*

EPA will evaluate how well applications identify expected outputs and outcomes for each proposed project, including listing GHG emission reductions and listing CAP and HAP emission changes as outcomes. Grant recipients will be required to track progress toward achieving these specific outcomes.

While quantified CAP and HAP emissions estimates are not required for the application, applicants should list CAP and HAP emissions reductions in general and in low-income and disadvantaged communities if they are expected. Implementation grantees will be expected to quantify CAP and HAP reductions in general and in low-income and disadvantaged communities in particular one year after receiving the grant.

### *Performance Measures, Authorities, Implementation Timeline, and Milestones*

EPA expects applicants to provide a clear description of performance criteria to track, measure, and report progress toward achieving the expected outputs and outcomes for each GHG reduction project. In this section, applicants should also identify the parties and their roles and responsibilities for implementing each GHG reduction measure. Applicants should also provide a detailed implementation timeline, including key milestones and actions to meet project goals and objectives by the end of the grant period.



## Criteria #4: Low-Income and Disadvantaged Communities

For this criterion, EPA will evaluate and score applications based on how they provide evidence of community engagement and quantify benefits for low-income and disadvantaged communities. Some entities (e.g. states) may have their own definition of low-income or disadvantaged communities, but the EPA emphasizes that applicants must use the definition as described on [pages 11-12 of the CPRG Implementation Grants](#).<sup>15</sup>

### *Community Benefits*

The NOFO requires applications to discuss and quantify direct and indirect benefits and potential impacts to low-income and disadvantaged communities, and requires that applicants:

- Provide a comprehensive discussion and assessment of expected benefits and/or avoided impacts to low-income and disadvantaged communities from the proposed GHG reduction projects;
- List Climate and Economic Justice Tool Census tract IDs or EPA's EJScreen Census block group IDs for areas that may be affected by GHG reduction projects; and,
- Describe the plan to [assess, quantify, and report](#) a more thorough quantitative analysis of associated community benefits, including co-pollutant (CAP and HAP) emission reductions.<sup>16</sup>

### *Meaningful Community Engagement*

The CPRG NOFO requires applicants to explain how input from low-income and disadvantaged communities was incorporated into the application and describe how meaningful engagement with low-income and disadvantaged communities will be continuously included in the implementation of the GHG reduction projects. Applicants should also explain how they are engaging with labor unions and other stakeholders, as explained below.

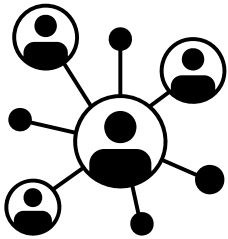
EPA encourages applicants to submit letters of support from project partners (this should include labor unions and community-based organizations) that demonstrate strong, long-term involvement throughout the project. These letters should indicate how project partners and supporting organizations will participate in or directly assist in the design and performance of the project. Letters should also explain how obtaining support from project partners will allow the applicant to perform the project more effectively. Submission of these letters or other ways of demonstrating good faith engagement with labor unions and community groups will support a strong application. Furthermore, it is critical that the unions and groups engaged in this process are those that would be most relevant and impacted to the project.

Under this section, EPA also encourages applicants to request funding for high-quality workforce development activities that benefit individuals in low-income and disadvantaged communities. A more productive, higher-skilled, and retained workforce comes from finding and partnering with union training programs, career technical education programs, labor-management partnerships, and registered apprenticeship and pre-apprenticeship programs that offer high-quality skills training that result in industry-recognized credentials, often with wrap-around services like support for childcare and transportation. EPA strongly encourages applicants to partner with worker representatives—including labor unions or worker centers—to promote worker-centric, high-quality workforce development opportunities.

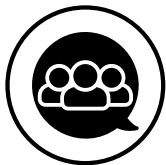
## How to Engage Communities and Develop Community Benefits

To fulfill this criteria, applicants should develop a plan to engage with and address the priorities of labor unions and other worker organizations, workforce development organizations, local government, emergency responders, Tribes, organizations representing residents and businesses, environmental justice communities, systematically marginalized communities, and community-based organizations that support or work with these communities. This engagement should result in written, legally binding commitments to deliver measurable community and job benefits through milestones and the use of tools such as local hire agreements, Project Labor Agreements (PLAs), Community Workforce Agreements (CWAs), Community Benefit Agreements (CBAs), and/or collective bargaining agreements. The agreements should identify how concerns will be mitigated, and specify the distribution of community and economic benefits, including job quality, access to jobs and business opportunities for residents, and mitigating community harms to reduce or eliminate these types of risks.

To achieve meaningful community engagement, applicants should follow five main steps:



- 1. Define the Community.** Gather the information that turns the general concept of community into an understanding of the people, institutions, and social and economic conditions in the real place that your project will impact and plan to benefit. Communities are not homogenous, and the most impacted members of a community may not be represented by political leaders or the Chamber of Commerce. A deep dive into the profile of the affected community or communities seeks to reveal the potential disproportionate and/or cumulative impacts of the proposed project and elicit input on the priorities of the members of the community that may not be represented through traditional channels. Communities that can provide input and see their values reflected in development priorities are likely to be more supportive of proposed projects.
- 2. Identify Labor Unions.** Early identification and outreach to unions will aid in community mapping and local organizational and government outreach. Learning the labor history of a community can be a quick way to understand local political dynamics. Engaging with unions is the first step towards standardizing wages, increasing productivity, decreasing turnover, enhancing safety and compliance, and formalizing communication with employees through a collective bargaining agreement. The national and state AFL-CIOs and local Central Labor Councils in every state—including “right-to-work” states—can assist in the identification of unions and other worker-focused groups who represent the sector of workers you will need in your proposed project.
- 3. Identify Potential High-Road Workforce Development Partners.** This section of the CPRG NOFO strongly encourages applicants to consider workforce development. Retaining a more productive and higher-skilled workforce comes from finding and partnering with union training programs, career technical education programs, labor-management partnerships, and registered apprenticeship and pre-apprenticeship programs that offer high-quality skills training that result in industry-recognized



credentials, with wrap-around services like support for childcare and transportation. DOL is identifying high-road training programs that “implement demand-driven workforce strategies advancing job quality, equity, and worker voice—that can train America’s infrastructure, clean energy, and manufacturing workforce.” To assist applicants for federal grants and loans, DOL has put together a [High Road to the Middle Class](#) map, an evolving resource of training programs that meet three DOL criteria:<sup>17</sup>

- › They provide training in an occupational skill or industry relevant to the workforce needs of “Investing in America” projects.
- › They leverage one or more of the following evidence-backed training models: registered apprenticeship; pre-apprenticeship; sector-based strategies; labor-management training partnerships; or community college-based workforce training programs; and
- › They have a partnership with an employer, multiple employers, or industry consortia and organized labor or a worker organization. DOL has also launched [apprenticeship.gov](#) “the one stop source to connect career seekers, employers, and education partners with apprenticeship resources.”<sup>18</sup>

4. **Reach out to the Identified Stakeholders.** Once you’ve fully mapped out the community, begin to engage with the identified stakeholders. Engagement can be done through meetings with individual stakeholders, community meetings, public consultations, workshops, and other organized ways to gather input, feedback, and insights from community members. If sufficient resources are available, hiring or contracting with a community engagement specialist can help build the trust that is necessary for successful engagement. Community engagement can be iterative as more connections are made. Different stakeholders may have capacity for different types of engagement, including town-hall meetings and/or workshops, meetings at places of employment or worship, one-on-one meetings, phone calls, and remote meetings.
5. **Negotiate Legally Binding Agreements.** The demographic assessment, stakeholder mapping, needs assessment, impact analysis, and labor and community profiling and engagement will help project planners identify the whole community—as well as their priorities and concerns. This can enable a spectrum of issues to be addressed in legally binding documents that are designed to ensure that intentions become reality. Legally binding agreements with community and labor organizations are the strongest documentation of the intent to not only be a benign neighbor but to measurably improve lives and livelihoods. While legally binding agreements need not be fully in place for the CPRG implementation grant application, demonstration success of community engagement through letters of support from frontline community organizations, Tribes, and unions will be needed fulfill this criteria (and are strongly encouraged in the CPRG NOFO).

In addition to the specific requirements for considering community engagement and benefits for low-income and disadvantaged communities as laid out in the CPRG NOFO, applicants should also ensure that projects improve the lives of low-income and disadvantaged communities using Justice40 criteria. Justice40 is a whole-of-government effort to fully recognize communities that have historically been left behind and use federal investments to begin to correct long-standing economic and environmental injustice. Through Justice40 programs (of which CPRG is one), the federal government has committed to deliver at least 40% of the benefits of public investments to disadvantaged communities.

The term community is defined in Justice40 as either geographic or people living with a common condition, such as migrant workers or Native Americans. A disadvantaged community is measured in census tracts that have been marginalized and overburdened by climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. The CPRG NOFO requires applicants to refer to [CEJST](#) Census tract IDs or EPA's EJScreen Census block group IDs.<sup>19</sup> Applicants should use these tools to provide a description of the existing environmental burdens at the proposed project location(s) and surrounding areas. Disadvantaged communities include communities geographically near a proposed project and communities directly affected by project construction or operations, including those that are upstream in the supply chain or downstream in the disposal of project waste.

In addition to potential benefits, the CPRG NOFO also requires applicants to consider the “disbenefits” of a proposed project. This can be done through an analysis of the potential impacts of the proposed project on:

- Tribal land;
- Frontline communities;
- Cultural and historic resources and community institutions;
- Animal species;
- Land use;
- Water and air quality;
- GHGs;
- Transportation; and
- Other local concerns.

The analysis should also address:

- All potential exposures to toxic and hazardous substances;
- Increases in ambient noise, odor, heat, and wastes; and
- Other potential impacts of construction and operation to low-income and/or minority populations or otherwise systematically marginalized groups and the environment.

The analysis should explicitly address the cumulative impacts to which the project contributes—including those burdens identified above. As applicants engage communities and work to maximize community benefits, they should also develop a strategy to minimize negative impacts, including natural resource depletion and ecosystem disruption. Additionally, applications should measure, track, and report project impacts, including any community monitoring data. This strategy should be developed with and subject to review by impacted communities.

For a step-by-step guide to identifying and engaging communities and labor unions and identifying potential high-road workforce development partners, consult the BlueGreen Alliance's [User Guide for Companies to Demonstrate Community Benefits in Federal Funding Applications](#).<sup>20</sup>

The BlueGreen Alliance's [Checklist for Federal Funding Applications](#) also provides a comprehensive view of community benefits that could be integrated into applications.<sup>21</sup> While not all these criteria are mandatory, adhering to each would help applicants in showcasing the community benefits in their federal funding applications.

## Criteria #5: Job Quality

The application will be evaluated on the quality of the response and extent to which it describes concrete strategies and commitments to ensure job quality, strong labor standards, and a diverse, highly skilled workforce for the implementation of the GHG reduction projects.

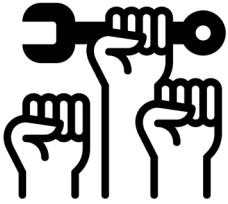
Applications should describe concrete, specific strategies to ensure CPRG implementation grant funds and the implementation of GHG reduction measures generate high-quality jobs with a diverse, highly skilled workforce and support high-road labor practices. The CPRG NOFO directs applicants to think of job quality expansively and consider opportunities to incorporate strong labor standards for all partners involved in implementing the GHG reduction measures, including contractors, sub-contractors, and sub-awardees.<sup>22</sup> The CPRG NOFO strongly encourages applicants to collaborate with partners (such as labor unions) with expertise in job quality and labor standards for this component of the application. As in the community engagement section above, applicants should attach letters of support or commitment from labor unions.

EPA also expects applicants to review and adopt the eight [Good Jobs Principles](#) developed by the U.S. Department of Labor as they respond to this criterion.<sup>23</sup> Key characteristics of a high-quality job include family-sustaining wages and benefits, the free and fair choice to form or join a union, and an emphasis on worker health and safety. Furthermore, good jobs are those where workers have equitable opportunities to progress to future good jobs within their organizations or outside them; and where workers have transparent advancement opportunities and access to quality training and education.

Applicants should consult U.S. Department of Labor resources to understand the Good Jobs Principles and implement them through federal funding programs including:

- [Good Jobs in Federal Investments: A Toolkit for Employers, Workers, and Government](#)<sup>24</sup>
- [Good Jobs Initiative Job Quality Check List](#)<sup>25</sup>
- [Good Jobs in Federal Investments: Data and Reporting Appendix](#)<sup>26</sup>

The BlueGreen Alliance’s [Checklist for Federal Funding Applications](#) provides a list of high-road labor standards that should be integrated into applications.<sup>27</sup> While not all these criteria are mandatory, adhering to each would help applicants in showcasing their commitment to job quality in their federal funding applications:



1. **Workforce:** To show a commitment to good-paying union jobs and the development of a high-road, skilled, and diverse workforce, application criteria should include:
  - › Proof of compliance of all construction contractors and subcontractors with the **Davis-Bacon Act and Related Acts (DBRA)**. Contractors and subcontractors must agree that all employees shall be paid the local prevailing wages and receive accompanying benefits as identified under DBRA. Compliance with Davis-Bacon should be considered a floor—contractors and subcontractors should be encouraged to pay a living wage.
  - › The development of a **PLA** to predict and control project timelines and labor costs. A PLA establishes the terms and conditions of employment for workers on specific construction projects, including wages, hours, working conditions, and dispute resolution methods. These agreements can be utilized at the state and local level to ensure high-road labor standards and timely project completion.
  - › A **CBA** to take into account community interests in large development or construction projects. By requiring or incentivizing CBAs, agencies can hold developers accountable to providing the benefits they promise, and community groups can have a say in the development process.
  - › **Targeted Hire** benchmarks to support the hiring of workers on a project from certain communities, which may include women, people of color, veterans, the formerly incarcerated, dislocated workers, indigenous people, low-wealth communities, communities heavily impacted by climate change, pollution, energy transition, or deindustrialization, and many others. These communities may be prioritized or targeted for funding opportunities through contracting requirements, hiring requirements, or the use or establishment of pre-apprenticeship programs. Ideally, these provisions establish long-lasting pipelines for members of these communities to access good jobs and careers in the clean economy.
  - › **Local Hire** benchmarks to support the hiring of workers from within the state or local community. Without this provision, work crews from out of state can be brought in, minimizing the job creation benefits for the local community. Local hire provisions may mandate a certain percentage of local workers be used, they may offer incentives to hire local workers, or they may simply require that local employment impacts are considered alongside other benefits of projects being evaluated.
  - › The use of **Union-Affiliated Training, Registered Apprenticeship, and Pre-Apprenticeship Programs**, many of which offer wrap-around services to support



trainees through the programs and help ensure that workers have a clear path towards skills advancement and career development. Federal agencies should encourage or—where statutory authority permits—require the use of these programs to promote workforce development and ensure that workers receive appropriate training and education. Requiring the use of these programs can also help promote equity and fairness in the workplace by providing training and career advancement to individuals from underrepresented groups.

**2. Worker Rights and Protections:** To ensure workers' rights, benefits, and health and safety on the job, applications must include:

- › Information describing how the applicant will support and protect **workers' free and fair chance to form or join unions** of their choosing and exercise their collective voice in the workplace, in both construction and ongoing operations. By supporting workers' rights to organize and bargain collectively, agencies can promote fair and safe working conditions, protect workers' interests, and foster a more inclusive and equitable society.
- › **Collective Bargaining Agreements:** Applicants should demonstrate or explain whether the applicant or sub-applicants have existing collective bargaining agreements or how they will execute them.
- › **Prohibition on Spending:** Agencies should prohibit award recipients or any sub-recipient from using grant funds—directly or indirectly—to oppose union organizing.
- › **Retirement Contributions and Fringe Benefits:** High-road benefits like retirement contributions and fringe benefits can support employer recruitment efforts, motivate existing employees to increase and maintain high performance, and reduce employee burden with certain free and money-saving accommodations like transportation assistance or meal stipends. Promoting retirement contributions and fringe benefits can enable workers to thrive both in and outside of the workplace and can contribute to a more stable and prosperous society.
- › **Title VI of the Civil Rights Act of 1964:** Agencies should require compliance with Title VI in order to promote equal opportunity and prevent discrimination in all federally funded programs and activities. This can help to ensure that all individuals—regardless of their race, color, or national origin—have access to the benefits of federally funded programs and are not subjected to discrimination.
- › **Preventing Worker Misclassification:** Agencies should require that applicants prevent misclassification to guarantee workers' benefits and protections. Applicants should explain how projects will properly classify employees and notify all workers of their rights—including workers treated as independent contractors.
- › Activities and policies that engage **workers in the design and execution of workplace safety and health programs** that include a comprehensive analysis and management

plan for all risks. These plans should address:

- › How hazards will be identified and controlled;
- › How open communication about safety and lessons learned will be encouraged;
- › How workers will be protected from harassment and discrimination;
- › How retention rates will be measured; and
- › How worker and workplace concerns will be addressed.
- › **Occupational Safety and Health (OSH) Act and the Contract Work Hours and Safety Standards Act (CWHSSA):**
  - » Agencies should require applicants to express commitment to the CWHSSA and OSH Act at the time of the application, and during the use of program funds.
  - » Agencies should require evidence of a workplace safety and health program that is designed and implemented with workers and their representatives and in compliance with state and federal Occupational Safety and Health Administration (OSHA) regulations to ensure safe and healthy working conditions.
  - » Compliance with OSHA regulations helps prevent workplace injuries and illnesses and promotes a culture of safety in the workplace.
  - » Requiring compliance with CWHSSA **prevents** workers **from exposure** to unsanitary, hazardous, or dangerous working conditions on federal and federally financed and assisted construction projects.
  - » Frequently, workers in the construction industry are subject to overtime hours and the CWHSSA offers an avenue for intervention by the workers if the contractor violates the overtime requirements.

## Criteria #6 and #7: Programmatic Capability, Past Performance, and Budget

This user guide will not go into detail on the final two criteria (#6 and #7) that EPA requires in the workplan. These criteria are administrative in nature, asking applicants to detail their programmatic capability, past performance, budget management, and timely expenditure of grant funds. Refer to [pages 40-49 of the CPRG NOFO](#) for details.<sup>28</sup>



# RESOURCES

## EPA Resources

- EPA CPRG landing page: <https://www.epa.gov/inflation-reduction-act/about-cprg-implementation-grants>
- EPA CPRG Implementation Grants Q&A (January 2024): <https://www.epa.gov/system/files/documents/2023-12/cprg-implementation-grants-general-competition-questions-and-answers.pdf>
- EPA CPRG Training Tools and Technical Assistance: <https://www.epa.gov/inflation-reduction-act/about-cprg-training-tools-and-technical-assistance>
- CPRG Implementation Grant NOFO: <https://www.epa.gov/system/files/documents/2023-09/CPRG%20General%20Competition%20NOFO.pdf>
- Qs and As from the Climate Pollution Reduction Grants (CPRG) Technical Assistance Forums: <https://www.epa.gov/system/files/documents/2024-02/qs-and-as-from-the-climate-pollution-reduction-grants-cprg-planning-grants-february.pdf>
- CPRG Training, Tools and Technical Assistance: <https://www.epa.gov/inflation-reduction-act/about-cprg-training-tools-and-technical-assistance>
- Questions regarding all aspects of the CPRG implementation grants NOFOs (including evaluation criteria and required application requirements) should be directed to this EPA email address: [CPRG@epa.gov](mailto:CPRG@epa.gov)

## Department of Labor Resources

- Good Jobs Principles: <https://www.dol.gov/general/good-jobs/principles>
- Good Jobs in Federal Investments: A Toolkit for Employers, Workers, and Government: <https://www.dol.gov/sites/dolgov/files/OPA/GoodJobs/Toolkit/Good-Jobs-Toolkit.pdf>
- Good Jobs Initiative Job Quality Check List: <https://www.dol.gov/general/good-jobs/job-quality-check-list>
- Good Jobs in Federal Investments: Data and Reporting Appendix: <https://www.dol.gov/sites/dolgov/files/OPA/GoodJobs/Toolkit/Good-Jobs-Toolkit-Data-Appendix.pdf>

## BGA Resources

- BlueGreen Alliance Checklist for Federal Funding Applications: <https://www.bluegreenalliance.org/wp-content/uploads/2023/08/Federal-Funding-Checklist-1.pdf>
- BlueGreen Alliance Guide to Community Benefits in Federal Funding Applications: <https://www.bluegreenalliance.org/wp-content/uploads/2023/12/Companies-Succeed-Communities-Benefit-User-Guide-vFINAL.pdf>
- BGA Buildings Roadmap: [https://www.bluegreenalliance.org/wp-content/uploads/2023/07/BGA-MUSH-Report\\_FINAL.pdf](https://www.bluegreenalliance.org/wp-content/uploads/2023/07/BGA-MUSH-Report_FINAL.pdf)
- Building Clean Product Search Portal: <https://buildingclean.ecomedes.com/>
- BGA User Guide to the Inflation Reduction Act: <https://www.bluegreenalliance.org/site/a-user-guide-to-the-inflation-reduction-act/>
- BGA User Guide to the Bipartisan Infrastructure Law: <https://www.bluegreenalliance.org/site/a-user-guide-to-the-bipartisan-infrastructure-law-bil/>

## Other Resources

- Environmental Protection Network (EPN), Suggested Step-by-Step Guides to Apply for EPA's Climate Pollution Reduction Competitive Implementation Grants: <https://www.environmentalprotectionnetwork.org/cprg-application-guides/>
- RMI & Evergreen Collaborative, IRA Implementation Guidance for States: CPRG Implementation Grants General Competition: <https://www.evergreenaction.com/state-guidance/ClimatePollutionReductionGrants-March2023.pdf>
- American Society of Civil Engineers, America's Infrastructure Report Card: State Infrastructure Facts: <https://infrastructurereportcard.org/state-by-state-infrastructure/>



## APPENDIX A: EXAMPLE—BUILDINGS SECTOR PROJECT

Below is an example of how an applicant with a buildings-focused project might begin to address select criteria from the EPA's CPRG Implementation Grants NOFO. Applicants should tailor their application to project/geographic area.

High-road labor standards are key to maximizing energy efficiency investments to support and create good, union jobs. Studies have shown that poor installation of energy efficiency measures often results in energy savings losses of up to 50%.<sup>29</sup> Investing in a qualified workforce that will install these technologies properly ensures that stakeholders realize the full potential of their investments and building occupants receive the full expected economic and health benefits.

### 1b. Demonstration of Funding Need (10 points):

*"The application will be evaluated on the quality of the response and extent to which it:*

- *Demonstrates a strong need for EPA CPRG implementation funding;*
- *Explains if and how other funding streams have been explored, and why these sources are not sufficient; and,*
- *Lists federal and non-federal funding sources the applicant has applied for, has secured, and/or will secure to implement the GHG reduction measures, if applicable."*

#### *Buildings Sector:*

- Hospitals and other public buildings have no funding earmarked within the Bipartisan Infrastructure Law or Inflation Reduction Act.
- \$80 billion in funding for school infrastructure was allocated in the Build Back Better Act but was not included in the final bill of the Inflation Reduction Act. The Bipartisan Infrastructure Law included only \$500 million for Renew America's Schools grants over five years. The first round was oversubscribed by \$5 billion and—due to high demand and overwhelming evidence of public need—DOE more than doubled the funding for round one of the competition, from \$80 million to \$178 million..
  - › The average age of school buildings was calculated at 55 years old.<sup>30</sup> The EPA found that approximately a quarter of energy used in U.S. schools is wasted and facilities in low-income areas are often the least efficient.<sup>31</sup> According to the General Accountability Office 2020 report, thousands of the nation's 100,000 public K-12 schools and many of our Tribal schools are in highly deteriorated condition. Not surprisingly, most of these schools are situated in low-income areas.<sup>32</sup>
  - › Nationally, school districts face a deficit of \$85 billion every year for spending and investments needed just for their K-12 facilities.<sup>33</sup>

## 1c. Transformative Impact (15 points)

*“The application will be evaluated on the quality of the response and extent to which it demonstrates that the GHG reduction measures have the potential to create transformative opportunities or impacts that can lead to significant additional GHG emissions reductions.”*

### *Buildings Sector:*

- **Climate:** The building sector accounts for almost a third of the country’s GHG emissions. New buildings are increasingly subject to efficiency standards, but it’s critical that existing ones are upgraded to keep pace.
- **Jobs:** The BlueGreen Alliance estimates that for every \$250 million invested in energy-efficient public buildings more than 16,700 jobs are created over 10 years. This breaks down to 6,562 direct, 4,225 indirect, and 5,937 induced job-years.<sup>34</sup> Done right, these will be good, family-sustaining jobs created in domestic manufacturing, construction, and professional trades.
- **Money saved:** Municipal governments spend up to 10% of their budgets on energy and schools’ energy use is the second highest budget item after salaries.<sup>35,36</sup>
- **Health:** Building retrofits that improved the indoor environment of a building have reduced instances of communicable respiratory diseases by 9-20% and allergies and asthma by 18-25%, and other health and discomfort by 20-50%.<sup>37</sup>

## 2a. Magnitude of GHG Reductions from 2025 to 2030 (20 points)

*“The application will be evaluated on the magnitude of cumulative GHG emission reductions and the durability of the reductions to be achieved by the proposed GHG reduction measures from 2025 through 2030, using appropriate methodologies and assumptions. Applications will be assessed on the estimated emission reductions that will directly result from EPA CPRG implementation grant funding.”*

### *Buildings Sector:*

- The American Society of Civil Engineers Infrastructure Report Card documents that public K-12 schools are the second largest sector of U.S. public infrastructure spending after highways. The carbon emissions from the nation’s school buildings are estimated to be 42 million metric tons of CO<sub>2</sub>—equivalent to 2018 carbon emissions for the state of Nevada.<sup>38</sup>
- The healthcare sector contributes 10% of total GHG emissions in the U.S.<sup>39</sup>

## 2c. Cost-Effectiveness of GHG Reductions (15 points)

*“The application will be evaluated on the quality of the response and the:*

- *Cost effectiveness of the GHG reduction measures in terms of the CPRG implementation grant dollars requested divided by cumulative GHG metric ton of CO<sub>2</sub>-equivalent emission reductions to be achieved from 2025 through 2030 for the set of measures in the application, and*
- *Qualitative narrative explaining any factors that may affect the cost-effectiveness calculation.”*

### *Buildings Sector:*

- The longer that buildings deteriorate the more expensive it is to upgrade them.
- Utilizing CPRG funds as upfront capital for clean energy tax credits will allow for reimbursements from the IRS for up to 60% for tax-exempt entities such as public schools and non-profit hospitals.<sup>40</sup>
- On a practical level, refurbished green schools can save billions of public dollars annually in the long term by being more energy- and water-efficient, contributing to reduced healthcare costs and reducing maintenance and repair expenses.
- Green schools, which achieve the maximum level of water and energy efficiency and are built with the health of occupants in mind, utilize an average of 33% less energy and 32% less water, lowering utility costs of a typical green school by around \$100,000 annually.<sup>41</sup>

## **4a. Low-Income and Disadvantaged Community Benefits (25 points)**

Each measure should be assessed based on the anticipated benefit to communities, particularly low-income and disadvantaged communities. Examples of expected benefits include “creation of high-quality jobs and new workforce training opportunities in low-income and disadvantaged communities with an emphasis on expanding opportunities for individuals that face barriers to employment” and “decreased energy costs and improved energy resilience.”

### *Buildings Sector:*

- Within the buildings sector, there is significant potential to address racial and economic inequality, to advance environmental justice, and to tackle climate change while creating good, union jobs. This can be done by a) prioritizing investments in communities that are disproportionately burdened with older, inefficient, and unhealthy buildings and b) creating targeted job and career opportunities across the energy efficiency sector for disadvantaged workers.
- The Justice40 (J40) Initiative calls for a minimum of 40% of all benefits of climate and clean energy federal investments—including workforce development—to go to communities that are marginalized, underserved, and overburdened by pollution.

In addition to implementing J40 for training and workforce development programs, additional high-road labor standards can be used specifically to support disadvantaged communities. This includes targeted and local hire provisions, often included in Community Workforce Agreements (CWA) or Community Benefits Agreements (CBA), as well as pre-apprenticeships with comprehensive wraparound services such as childcare and transportation.

*\*Applicants may consider consulting <https://buildingclean.ecomedes.com/> for building products that can help improve the physical and economic health of communities by making it easier to source building products that won't create or exacerbate health conditions for residents and will help support local economies through the creation of good-paying union jobs.*

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