White House Environmental Justice Advisory Council Recommendations: Scorecard Workgroup

December 21, 2023

Prepared by:

White House Environmental Justice
Advisory Council Scorecard Workgroup

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Acknowledgements

Disclaimer

This report of recommendations has been written as part of the activities of the WHEJAC, a public advisory committee providing independent advice and recommendations on the issue of EJ to the Administrator, The Council of Environmental Quality (CEQ), White House Environmental Justice Interagency Council (IAC), and other officials of the White House. In addition, the materials, opinions, findings, recommendations, and conclusions expressed herein, and in any study or other source referenced herein, should not be construed as adopted or endorsed by any organization with which any Workgroup member is affiliated. This report has not been reviewed for approval by the EPA or CEQ, and hence, its contents and recommendations do not necessarily represent the views and the policies of the EPA or CEQ, nor of other agencies in the Executive Branch of the Federal government.

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December 19, 2023

The Honorable Ms. Brenda Mallory, Chair
The Council on Environmental Quality
Executive Office of the President
Washington, DC 20500

Dear Chair Mallory:

The White House Environmental Justice Advisory Council (WHEJAC) submits the following recommendations to you and the White House Environmental Justice Interagency Council (IAC) to inform the development of Phase Two of the Environmental Justice (EJ) Scorecard.

The WHEJAC received three charge questions pertaining to the presentation of information, the approach for reporting on Justice40, and the qualitative and quantitative metrics that should be included in future versions of the EJ Scorecard. The enclosed recommendations respond to these questions in detail, including recommendations that should apply to all agencies as well as suggestions that are specific to each agency. This work is based on a review of the existing EJ Scorecard, meetings with seven federal agencies to hear about their challenges reporting for EJ Scorecard Phase One, and our own experiences in using the existing EJ Scorecard as environmental justice stakeholders. We wish to preface our recommendations with two overarching observations.

First, we believe strongly in the efforts of this administration to address the imperative of environmental justice, and the essential role that the EJ Scorecard can play in gauging those efforts and uncovering areas for improvement. As history and present teach us, the pursuit of environmental justice is an ongoing project, even as we envision a future free from environmental racism where fundamental rights are guaranteed for all. In this regard, we believe that the *Environmental Justice Scorecard* should be renamed as an *Environmental Justice Progress Report*, which would better capture both the spirit of the endeavor and what the tool in fact does.

Second, the recommendations contained in this report are offered with the conviction that the EJ Scorecard could be much more robust. We are convinced that if CEQ updates the design of the Scorecard from a human-centered perspective, it will help the public better comprehend the roles of various federal agencies, gain insight into their mission and work of these agencies, and learn about tangible progress and

outcomes that would affect their communities. Fully realizing the potential of the EJ Scorecard will require agencies to have a deeper understanding of how people see and experience progress on environmental justice. Agencies must internalize how environmental justice cannot be narrowly conceived, as it is intertwined with multiple domains of racial and social justice, including civil rights, housing, health, labor, and education.

Our experience in developing these recommendations reinforces our belief that much work lies ahead yet much can be accomplished. We thank you in advance for considering our recommendation and look forward to your response. Specifically, we request that responses to our recommendations be provided at the WHEJAC public meeting being planned for Spring 2024. As always, we value the opportunity to contribute to the Administration's efforts to address current and historic environmental injustice.

Sincerely,

Richard Moore, WHEJAC Co-chair

Peggy M. Shepard, WHEJAC Co-chair

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Acronyms

AmeriCorps	The Corporation for National and Community Service
ARC	Appalachian Regional Commission
BLM	Bureau of Land Management
BOEM	Bureau of Ocean Energy Management
BSEE	Bureau of Safety and Environmental Enforcement
CCS	Carbon Capture & Storage
CDC	Centers for Disease Control and Prevention
CEJST	Climate and Economic Justice Screening Tool
CEQ	Council on Environmental Quality
DACs	Disadvantaged Communities
DHS	Department of Homeland Security
DOE	Department of Energy
DOC	Department of Commerce
DOD	Department of Defense
DOI	Department of Interior
DOL	Department of Labor
DOT	Department of Transportation
DRA	Delta Regional Authority
ED	Department of Education
EDA	Economic Development Administration
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FUDS	Formerly Used Defense Sites
GSA	General Services Administration
HBCUs	Historically Black Colleges and Universities
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
IAC	White House Environmental Justice Interagency Council

IHS	Indian Health Service
IRA	Inflation Reduction Act
J40	Justice40 Initiative
LEPC	Local Emergency Planning Committee
LIHEAP	Low Income Home Energy Assistance Program
MSIs	Minority-Serving Institutions
NAAQS	National Ambient Air Quality Standards
NASA	National Aeronautics and Space Administration
NIH	National Institute of Health
NIST	National Institute of Standards and Technology
NPS	National Park Service
NSF	National Science Foundation
NOAA	National Oceanic and Atmospheric Administration
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration
OTEC	Ocean Thermal Energy Conversion
PHMSA	Pipeline and Hazardous Materials Safety Administration
RHS	Rural Housing Service
RMP	Risk Management Program
POC	Person of Color
SBA	Small Business Administration
SFFA	Students for Fair Admissions
SNAP	Supplemental Nutrition Assistance Program
TVA	Tennessee Valley Authority
USACE	U.S. Army Corps of Engineers
USDA	United States Department of Agriculture
USDS	U.S. Digital Service
USGS	U.S. Geological Survey
VA	Department of Veterans Affairs
VIPR	Virgin Islands and Puerto Rico
WHEJAC	White House Environmental Justice Advisory Committee
WIC	Women, Infants, and Children

Glossary of Key Terms

Disadvantaged Community	Disadvantaged communities are regions characterized by a convergence of challenges encompassing adverse public health outcomes, environmental pollution, susceptibility to climate change impacts, and specific socioeconomic indicators. These communities typically consist of a significant proportion of low- and moderate-income households and often coincide with areas facing environmental justice concerns. DACs grapple with the compounding effects of economic, health, and environmental disparities, making them a focal point for addressing equity and justice in various policy initiatives and interventions.
Environmental Justice	Environmental justice is the resolution to the harms caused by environmental violence and racism that have resulted in the disproportionate toxic burden on communities of color, communities experiencing low income, and fenceline communities throughout the U.S. and its territories. Environmental justice is the right and dignity of all people, regardless of race, class, gender, ability, national origin or immigration status, to a clean, healthy, and just environment where they live, subsist, work, go to school, and where they pray, and it is the fair treatment and meaningful involvement of all people with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.
Executive Order 14008	On January 27, 2021, President Biden issued Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, which outlines the Justice40 Initiative and Sec. 220 (d) requires that the IAC develop clear performance metrics to ensure accountability and publish an annual public performance scorecard on its implementation, and that the IAC do so by consulting with the WHEJAC.
Fenceline Community	A fenceline community refers to a residential area located directly adjacent to facilities that emit high levels of pollution. Typically, these communities in the United States consist of individuals with low incomes and communities of color, who often face systemic discrimination, including environmental injustice.
Indigenous Peoples	State-recognized Tribes; Indigenous and Tribal community-based organizations; individual members of federally recognized Tribes, including those living on a different reservation or living outside Indian country; individual members of state-recognized Tribes; Native Hawaiians; Native Pacific Islanders; and individual Native Americans.

Justice40 Initiative	The Federal Government has made it a goal that at least 40 percent of the overall benefits of certain federal investments flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution.
	The seven categories of investment that fall within the Justice40 Initiative are: climate change, clean energy and energy efficiency, clean transit, affordable and sustainable housing, training and workforce development, remediation and reduction of legacy pollution, and the development of critical clean water and wastewater infrastructure.
Low-Income	Populations that are characterized by limited economic resources. The US Office of Management and Budget has designated the Census Bureau's annual poverty measure as the official metric for program planning and analysis, although other definitions exist.
Covered Program	A "covered program" is a Federal Government program that falls in the scope of the Justice40 initiative because it includes investments that can benefit DACs across one or more of the seven categories of investment.
Title VI	Title VI of the Civil Rights Act of 1964 prohibits discrimination based upon race, color, and national origin under any program or activity receiving federal financial assistance.
Tribe	Federally recognized Tribes include any Indian or Alaska Native Tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian Tribe pursuant to the Federally Recognized Indian Tribe List Act of 1944, 25 U.S.C.479a. All uses of Tribe will be for federally recognized Tribes, unless specifically stated otherwise within the document.

Preamble

[Executive Order (EO) 14008,](#) directs the White House Environmental Justice Interagency Council (IAC) to develop clear performance metrics to ensure accountability and publish an annual public performance "scorecard" on its implementation by consulting with the White House Environmental Justice Advisory Council (WHEJAC). EO 14008 also directs the Office of Management and Budget (OMB), in coordination with the Center for Environmental Quality (CEQ), United States Digital Service (USDS), and relevant agency heads, to publish on a public website an Environmental Justice Scorecard detailing agency EJ performance measures. The original [charge](#) to the WHEJAC in September 2021 requested that the Scorecard Workgroup provide advice and recommendations to the IAC on performance metrics that will help evaluate and assess progress on the agencies' efforts toward addressing current and historic environmental injustice.

In September 2021, CEQ requested WHEJAC address the following question regarding development of the Scorecard: What types of indicators or data would be useful in an agency scorecard? The WHEJAC was asked to provide input in the form of general ideas or specific data and established an Environmental Justice Scorecard Workgroup to do so. On March 8, 2022, the WHEJAC submitted its [Phase One Recommendations](#) to CEQ and the IAC, which established the core principles and basis of an Environmental Justice Scorecard for federal agencies.

On April 21, 2023, OMB, CEQ, and USDS [released](#) the [Phase One Scorecard](#), which serves as a baseline for tracking agency progress over time, displaying meaningful changes in communities and the broad advancement of EJ. It focuses on agency accomplishments between 2021 and 2022 and integrates feedback from various stakeholders, including the WHEJAC, the public, and members of Congress. Phase One incorporates both quantitative and qualitative metrics, categorized into the J40 Initiative, environmental and civil rights protection, and institutionalized EJ.

In September 2023, the WHEJAC Scorecard Workgroup received three new charge questions from CEQ that offered specific considerations to help narrow down the Scorecard for Phase Two and prioritize recommendations that are most effective. Specifically, the workgroup was tasked to evaluate the information and metrics included in the Phase One Scorecard to inform future versions, including the Phase Two Scorecard.

The Charge and Approach to the Response

The questions for the Scorecard Workgroup to consider in assisting the WHEJAC with fulfilling the current charge are:

1. Based on evaluating the Phase One Scorecard, how can the Environmental Justice Scorecard data be presented in a way that is most useful for environmental justice stakeholders?
2. Based on evaluating the Phase One Scorecard, what approach should be taken on reporting out Justice40 Initiative metrics? (i.e., alongside metrics that agencies are providing on environmental justice or separately)
3. What additional qualitative and/or quantitative metrics could federal agencies include in the Phase Two Scorecard, or future versions of the Environmental Justice Scorecard, to reflect the needs and priorities of communities that face environmental injustices?

The workgroup elected co-chairs, Peggy Shepard and Maria López-Núñez, and began hosting meetings every two weeks. The workgroup assembled in an in-person workshop November 1-3, 2023, in Washington, DC, to achieve a consensus and formulate recommendations. During the workshop, the workgroup collaborated with external experts and heard from federal agency representatives on their experiences with the Phase One Scorecard. Reflecting on the discussions with the agencies, the workgroup drafted recommendations for the three charge questions and identified key steps to further explore the charge.

Overarching Recommendations

We place a strong emphasis on ensuring that the metrics featured on the EJ Scorecard include tangible outcomes that directly impact the communities served by each federal agency. Rather than applying uniform expectations for the Scorecard to all agencies, we recommend a tailored approach, allowing each agency to provide metrics that are relevant to its activities. Furthermore, we encourage adopting a whole-of-government perspective and incorporating interagency relationships into the EJ Scorecards to provide a comprehensive view of government collaboration. Importantly, we recommend adopting the term "Environmental Justice Progress Report" instead of "Environmental Justice Scorecard" to better convey the document's purpose and its focus on ongoing progress rather than final judgments.

Reiteration of Recommendations from the Phase One Scorecard Recommendations Report

The WHEJAC wishes to highlight and elevate the following recommendations that we made as part of our Phase One Recommendations report, dated March 8, 2022. We are more convinced than ever that:

- "In brief, the EJ Scorecard will follow where and how federal money is spent, and what happens as a result of federal spending to communities disadvantaged by racial and economic inequities. Federal spending and investments will be tracked to evaluate community-level impacts, benefits, improvements, and lessons learned in terms of advancing environmental justice for Black, Brown, Indigenous and low-income communities."[1]
- "The EJ Scorecard is for all environmental justice programs, including (but not limited to) Justice40."[2]
- "Agency-specific EJ Scorecards should have a data strategy for developing environmental justice indicators that map onto short- and long-term environmental justice goals. Scorecards should draw from existing data sources, develop new data, and identify data needs. Data on race and income must be used to identify racial and income inequality."[3]

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[1] White House Environmental Justice Council, *Phase One Scorecard Recommendations Report*, March 8, 2022, 10, https://www.epa.gov/system/files/documents/2022-04/whejac-phase-one-scorecard-recommendations-report.pdf.
[2] White House Environmental Justice Advisory Council, Phase One Scorecard, 11.
[3] White House Environmental Justice Advisory Council, Phase One Scorecard, 11.

Recommendations for Charge Question 1: How can the Environmental Justice Scorecard data be presented in a way that is most useful for environmental justice stakeholders?

We emphasize that the EJ Scorecard should not be confined to a J40 Scorecard. EO 14008 explicitly references an EJ Scorecard, not exclusively a J40 Scorecard, hence we should not narrow focus solely to J40-covered programs. We recommend CEQ embraces an all-encompassing approach in alignment with the broader EJ objectives of the Executive Order.

Our overarching recommendation for improving the data presentation of the EJ Scorecard revolves around enhancing its user-friendliness and accessibility. We envision a comprehensive approach that calls for the incorporation of data visualization, graphical elements like infographics, tables, and graphs for tracking progress over time, and contextual narratives that elucidate the significance of the data. Moreover, the interface should offer interactivity and links from the reporting page to more detailed program information, including spatial data visualization through maps to facilitate intuitive navigation and understanding. We recommend the EJ Scorecard landing webpage presents data in a summary format, allowing users to quickly gain insights into agency performance. In addition to summary information, the landing webpage should include agency contributions on a map interface so users can understand efforts by location. Simultaneously, we recommend users have the option to delve deeper into the data, accessing detailed breakdowns that include agency-specific information and program-specific insights. Such granularity of information ensures that stakeholders can access both overarching trends and specific agency contributions, akin to the functionality found in California's Climate Investments Project Map [tool](#).

Recommendations Across All Agencies

We recommend the following specific measures to improve the accessibility, transparency, and effectiveness of the EJ Scorecard's data presentation and utility for EJ stakeholders:

Reframe EJ Scorecard to Prioritize Clarity for Public Engagement

- Rename the EJ Scorecard to emphasize its role as a progress report.
- For each agency, provide a narrative EJ progress report that includes a summary, the main text, a section that reflects public feedback on the agency programs and investments, and conclusions with next steps. The narrative progress report should both provide complementary information and be consistent with the quantitative metrics that we request across all agencies and specific to each agency.
- Ensure the EJ Scorecard addresses the full spectrum of EJ issues (beyond the scope of J40 efforts).
- Transform the EJ Scorecard into an educational resource to inform the public about the functioning of government agencies, using a human-centered approach. Agencies should collaborate with the Executive Office of the President (EOP) to adopt that approach.

- Direct EJ Scorecard content toward the general public, emphasizing clear and comprehensible content, program details, and outcome data.
- Ensure agency community outreach and communications staff review the EJ Scorecards before public release.

Update EJ Scorecard Website Content for Easier Access

- Establish an at-a-glance dashboard covering all agencies, with guidance to agencies on how to share stories for effective communication on the EJ Scorecard website.
- Include a map with various agency-specific layers for high-level metrics on the landing page.
  - Overlay the Climate and Economic Justice Screening Tool (CEJST) disadvantaged communities (DACs) and indicators in the EJ Scorecard map, with funding by bureau or sub-agency within each department.
  - Integrate the Build.gov and future Inflation Reduction Act (IRA) maps with spatial information agencies present as part of their Scorecard. Include a callout for the Build.gov website (and future IRA websites) on the EJ Scorecard page.
- Ensure the EJ Scorecard landing page contains hyperlinks to facilitate navigation to related websites and resources, including links to each agency's specific J40 webpages.
- Include historical and current metrics on EJ to analyze changes over time, providing before-and-after comparisons to effectively demonstrate the impact of agency efforts.
- Include stories of agency efforts to rectify past shortcomings, using the EJ Scorecard as a tool to demonstrate progress.
- Share transparent information on the flow of financial transactions, including detailed reports on funding allocation to both EJ and non-EJ communities to enhance accountability and clarity.
  - Enable data breakdown by Census tract, city, county, and state to illustrate funding allocation by geographic location.
  - Allow distinguishing and categorizing of funds designated for emergency recovery in response to natural disasters.
- Clarify to agencies whether the data requested for the EJ Scorecard should be presented in qualitative or quantitative format.
- Highlight the significance and relevance of the data presented in the EJ Scorecard, emphasizing its importance, similar to the Centers for Disease Control and Prevention (CDC) EJ dashboard.

Update EJ Scorecard Website Design

- Update the EJ Scorecard web address for clarity and accessibility.
- Hire a graphic designer with expertise in sharing public-facing information for webpage design.
- Create visually engaging elements, including maps, graphics, and illustrations, to enhance the presentation of data in the EJ Scorecard, ensuring that it is not text heavy.

Recommendations for Charge Question 2: What approach should be taken on reporting out Justice40 Initiative metrics?

While the Supreme Court recently upended a well-established equal protection law with its decision in Students for Fair Admissions (SFFA) v. Harvard and SFFA v. University of North Carolina, these cases have not overturned legal standards for compliance with federal civil rights in other areas. As such, agencies continue to have an obligation to evaluate their regulations, policies, and practices to ensure that they do not undermine equal protections and opportunities on the basis of race or otherwise.

Accordingly, while CEQ may be reluctant to explicitly include a metric of racial/ethnic composition in the CEJST to identify DACs eligible for J40 programs and investments, CEQ should ensure that the EJ Scorecard adopted by agencies include equity evaluations which include race/ethnicity to assess the funding flows and benefits of J40.

The WHEJAC has also recommended that CEJST should be revised to ensure equity evaluations that include race/ethnicity to assess the funding flows and benefits of J40. If CEJST were to be revised in such a way, then it could also be leveraged to inform the Scorecard by facilitating equity evaluations of J40 investment flows and their environmental benefits by race/ethnicity and other socioeconomic indicators.

The Justice40 Initiative represents a critical commitment to addressing environmental and economic disparities in DACs. To provide a clear and meaningful assessment, we emphasize the necessity of tracking both short-term and long-term outcomes, clarifying the initiative's purpose, and contextualizing its impact within broader EJ efforts. The approach we suggest on reporting J40 metrics will help agencies effectively communicate the progress and goals of J40 to the public and stakeholders.

Recommendations Across All Agencies

We recommend the following approaches to report on J40 metrics:

- Define and explain J40 to ensure a collective understanding among stakeholders. This clarity will help in presenting short-term and long-term outcomes effectively.
- Clearly present "before" J40 programming and "after" J40 programming scenarios. Recognizing that J40 requires time to yield meaningful results and cannot immediately rectify long-standing disparities, agencies should acknowledge the existing conditions before the J40 implementation.
- Emphasize both short-term and long-term outcomes, where feasible. While short-term outcomes, such as increased engagement, are important steps in the *process*, strive to provide tangible, material changes that directly *impact* people's lives.
- Highlight how J40 is contributing to changes in conditions that benefit DACs. This could include improved access to federal agencies, increased access to funding opportunities, cleaner air, and others.

Recommendations for Charge Question 3: What additional qualitative and/or quantitative metrics could federal agencies include in the Phase Two Scorecard, or future versions of the Environmental Justice Scorecard, to reflect the needs and priorities of communities that face environmental injustices?

In response to a growing demand for transparency and accountability, we call upon federal agencies to provide specific, detailed, and actionable data to share with the public on environmental justice efforts. The recommendations we provide regarding additional qualitative and/or quantitative metrics to include in the Phase Two EJ Scorecard serve as vital tools for gauging agency performance, monitoring compliance with EJ principles, and ensuring equitable access to the benefits of federal investments. While the recommendations provided here are not exhaustive and are not presented in order of priority, they offer a glimpse into the types of data points that stakeholders, advocates, and the public are keen to access. These recommended metrics aim to foster greater transparency and drive more informed decision-making within federal agencies.

Demographic Breakdown data may include:
- *Age*
- *Sex*
- *Race*
- *Ethnicity*
- *Income status*
- *Unemployment*
- *Linguistic isolation*
- *Educational attainment*
- *Tribal affiliations*
- *Voter turnout*

Data should be at the most highly resolved geographic designation possible (e.g., Census tract, block group, or zip code)

In the spirit of fostering transparency and allowing the Scorecard audience to understand what agencies have done to advance environmental justice and who has benefited from those efforts, we include recommendations for providing clarity on the demographics and identities of those who are impacted. For example, in learning about an agency's hiring practices, the EJ Scorecard audience would like to understand the racial, ethnic, and gender breakdowns of those who are hired and promoted through the ranks. Where we recommend agencies provide a "demographic breakdown" of program recipients, we expect to receive data that include details on age, sex, race, ethnicity, income status, unemployment status, linguistic isolation, educational attainment, Tribal affiliations, and voter turnout, in as fine geographic resolution as available (e.g., Census tract, block group, or zip code). We recognize that these data may not be available across all activities, but we encourage agencies to "dig deep" and be thoughtful about the type of information that demonstrates commitment to the Administration's recent Executive Orders.

Agency-Specific Recommendations and Requested Responses

Overall

Across all federal agencies, we recommend that:

Regarding Justice40 Programming

- Ensure Phase Two EJ Scorecards include a comprehensive list of all J40 programs operated by each agency.
- In addition to disclosing the amount of funds allocated to J40 programs, agencies must provide their total program spending to provide a comprehensive perspective on the allocation of funds to J40 programs.

Reporting Information Across Agencies

- Agencies must include a one-sentence summary on its role and function to ensure the public has context for the EJ-focused efforts shared within the EJ Scorecard.
- Each agency must develop an agency profile that encompasses essential information such as total budget, staff count, and the total number of programs, aligned with each agency's program definition. Reference [USDA's agency profile](#) as an example.
- Ensure the Phase Two EJ Scorecard contains an easily accessible Title VI summary page for all agencies, complete with hyperlinks for quick reference.
- Agencies must provide the requested EJ Scorecard data for their current year (however they define that year consistent with their internal functions) and ensure ongoing data collection for successive years to facilitate year-to-year comparisons.
- Agencies must provide demographic information regarding the organization's staff, including promotion rates and leadership roles held by race, ethnicity, and gender. Ensure the organization captures the roles and promotion rates of Indigenous peoples. Data should be categorized by office or bureau.
- When reporting metrics, agencies must clarify whether their programs have expanded, received increased resources, or undergone changes that ensure their focus on EJ.
- Include metrics that capture long-term outcomes specific to each agency, reflecting tangible impacts. These outcomes must be tailored to the agency's mission and will vary across agencies.
- Include metrics and measures employed by each agency to evaluate and address past harms, including how the agency is actively working to repair such harm and what preventive measures have been implemented to avoid repeating these negative impacts in the future.

The Corporation for National and Community Service (AmeriCorps)

For AmeriCorps, we recommend the agency provide the following:

- Information regarding the demographics of recruited individuals.
- Deployment locations of AmeriCorps members by zip code or Census tract.
- Data categorized by the types of AmeriCorps work, including Climate Corps, FEMA Corps, education, and other work types.

Appalachian Regional Commission (ARC)

For the ARC, we recommend the agency provide the following:

Data Transparency and Demographic Insight

- Demographic information regarding the organization's staff, including promotion rates and leadership roles held by race, ethnicity, and gender. Ensure the organization captures the roles and promotion rates of Indigenous peoples and other person of color (POC) groups. Data should be categorized by office or bureau.
- Starting and current wage statistics and wage trajectory of ARC's staff categorized by demographics to understand income disparities.
- Breakdown of the funds allocated to all J40 covered programs, including the [Partnerships for Opportunity and Workforce and Economic Revitalization](#) Initiative, by zip code or Census tract, enabling a localized view of investments.

Data Visualization

- Geographical map highlighting the states or specific regions covered by the ARC's initiatives.
- Job placement figures, distinguishing between temporary and permanent positions, with demographic details to offer insights into the workforce impact.

Denali Commission

For the Denali Commission, we recommend the agency provide the following:

- Breakdown of investments and projects, by zip code or Census tract.
- Job placement data, distinguishing between temporary and permanent positions, with demographic details to offer insights into the workforce impact.
- Demographic information regarding the organization's staff, including promotion rates and leadership roles held by race, ethnicity, and gender. Ensure the organization captures the roles and promotion rates of Indigenous peoples. Data should be categorized by office or bureau.
- Ensure that J40 covered programs are substantive and produce tangible outcomes, not merely plans.

Department of Homeland Security (DHS)

For the DHS, we recommend the agency provide the following:

Federal Emergency Management Agency (FEMA)

- Detailed information on FEMA's disaster assistance programs for renters, people who lack formal property titles, and people with titles, including the amount of assistance provided and any changes observed over time (of total).
- Steps taken to address the impacts of its property valuation methods in the context of disaster response and recovery.
- Outline of the agency's disaster risk reduction initiatives and strategies, such as funding and support for community-based distributed renewable energy (e.g., rooftop solar coupled with battery energy storage systems).

- The number and locations of communities and community-based groups that have received technical assistance from the agency, specifying the types of technical assistance provided.
- A breakdown of FEMA's project spending by Census tract and the total number of projects, with a specific focus on those benefiting DACs.
- Demographic information regarding the organization's staff, including promotion rates and leadership roles held by race, ethnicity, and gender. Ensure the organization captures the roles and promotion rates of Indigenous peoples and other POCs. Data should be categorized by office or bureau.
- The agency's measures and policies in place to ensure that the lack of documentation does not serve as a barrier for individuals seeking access to FEMA assistance and resources.
- Data on FEMA's property acquisition investments and their locations.
- The geographic distribution of FEMA's offices, specifying the number and proportion of offices located in DACs.
- FEMA's plan to address environmental injustice issues arising from its National Flood Insurance Program.
- Description of any changes or initiatives implemented as a result of the National Tribal Strategy and the appointment of Tribal representatives within the agency.
- Outline of the agency's efforts to ensure that immigration status does not hinder individuals from accessing disaster relief and resources.
- The agency's strategy for addressing environmental injustice associated with extreme weather events, such as wildfires, tornadoes, extreme heat, floods, droughts, hurricanes, earthquakes, and others.

Climate

- A comprehensive report on the measures and strategies DHS has implemented to address climate-related risks, such as extreme heat, at its facilities.
- A detailed plan for addressing climate-induced migration, encompassing proactive measures, response protocols, and collaboration with relevant agencies and communities.

Department of Commerce (DOC)

For the DOC, we recommend the agency:

- Ensure active fostering of community-academic partnerships, including Historically Black Colleges and Universities (HBCUs), Minority-Serving Institutions (MSIs), and Tribal colleges.
- Request specifics from the NIST regarding their efforts to foster diversity among scientists.
- Provide details regarding the activities of NOAA and EDA.

National Oceanic and Atmospheric Administration (NOAA)

- The number of universities involved in NOAA programs, specifying the number of HBCUs, MSIs, and Tribal colleges among them, and funding provided by NOAA for each category of institution.
- The number and types of partners, such as community-based organizations, non-profits, HBCUs, MSIs, and Tribal colleges.
- The number of climate education grants NOAA awarded to community-based organizations (of total).

- The agency's efforts to integrate EJ considerations into climate information analysis, particularly addressing overlapping risks like toxic exposures and climate vulnerabilities.
- The agency's measures to promote diversity among scientists.

Economic Development Administration (EDA)

- Demographic breakdowns and geographic distributions of EDA's private investment partners.
- Geographic distribution of places of performance for all EDA tax credits, grants, and loans.
- Data on affordable housing obligations met and jobs created from opportunity zone credits awarded projects.

Department of Defense (DOD)

For the DOD, we recommend the agency to report on the following:

Environmental Cleanups

- The number of cleanups conducted on military bases and the status and locations of the cleanups, including the timelines for completion of cleanups.
- How the agency incorporated community-based science and Indigenous knowledge into site characterization and cleanup decisions.
- Pending community requests for cleanup (e.g., formerly used defense sites, military bases, large detonation chambers for unexploded ordnance) and how the agency is responding to these requests.
- Progress of cleaning up Formerly Used Defense Sites (FUDS), presented with geospatial details.
- Levels of funding committed and spent to clean up formerly and currently used defense sites, including quantification for individual sites across the country and collectively.
- Rather than incomplete site characterizations and cleanups, premature closures, partial excavations, natural attenuation, and/or land use controls, focus on the effectiveness of cleanup, disposal methods, use and effectiveness of innovative in-situ non-incineration technologies (including those that are effective in the Arctic).
- The independent regulatory oversight and enforcement actions taken by Tribes and EPA to hold DOD accountable for responsible cleanup.
- Create a Global Military Superfund to "invest in remediation undertaken by local communities and local governments across the world through direct payments, technology transfer, and job training at sites contaminated by U.S. and U.K. military bases and operations in all territories both international and domestic."[4]

Tribal Involvement

- DOD's conduct of government-to-government consultations with Tribes, detailing the involved Tribes, consultation methods, and consultation outcomes.
- The quantity and identifies of Tribes, as sovereign governments, who set cleanup standards that they determined to be health protective.

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[4] Patrick Bigger, Nick Pearce, Khem Rogaly, and Ketaki Zodgekar, *Less War, Less Warming: A Reparative Approach to U.S. and U.K. Military Ecological Damages* (Common Wealth, 2023), 3, https://assets-global.website-files.com/62306a0b42f386df612fe5b9/6543bc046810de2fe759cf8d_military%20emissions%20final.pdf.

- The quantity and names of Tribes that were designated as official parties to the records of decision.
- Independent measures used in consultation with Tribes and other affected communities to evaluate whether cleanup is effective in protecting human health, traditional lands and waters, and traditional foods.
- The amount and forms of compensation DOD provided Tribes and other affected communities for damage to lands, waters, traditional foods, and harm to health.

Medical and Healthcare Oversight

- Levels of funding that DOD provides for medical monitoring and healthcare for communities harmed by military contamination.
- How DOD interacts with the Department of Health and Human Services (HHS), CDC, Agency for Toxic Substances and Disease Registry, and EPA to ensure effectiveness of cleanups in protection of human and environmental health.
- How DOD provides funding and assistance to independent expert medical and healthcare teams for evaluating exposures and diagnosing and treating health issues.

Climate Initiatives

- A comprehensive list of measures taken to reduce the agency's climate footprint.
- Data on environmental and occupational health exposures for both military personnel and communities affected by DOD operations.

Diversity and Equal Opportunity

- Information on measures taken and the number of incident reports related to discrimination.
- Details on the measures in place to ensure demographic parity between officers and enlisted personnel.

Department of Energy (DOE)

We advise the DOE provide data on:

Partnerships

- The number of universities involved in DOE programs, specifying the number of HBCUs, MSIs, and Tribal colleges among them, and funding provided by DOE for each category of institution.
- The number and types of partners, such as community-based organizations, non-profits, HBCUs, MSIs, and Tribal colleges.

Funding Allocation

- The total amount and proportion of funding allocated through J40 covered programs for oil, gas, coal, carbon capture and storage (CCS), hydrogen, and nuclear energy.
- The total amount and proportion of funding allocated through covered programs for solar, wind, ocean thermal energy conversion (OTEC), biogas, heat pumps, and other sources of energy generation and the proportion of funding invested in distributed solar and other renewable energy generation such as rooftop solar and battery energy storage systems.

Household Benefits and Energy Efficiency

- The number of households benefiting from heat pump installation programs and solar water heaters, including breakdowns by zip code or Census tract, rural versus urban areas, and demographic composition.
- The number of households benefiting from energy efficiency programs such as solar water heaters, including breakdowns by zip code or Census tract, rural versus urban areas, and demographic composition.

Environmental Impact and Cleanup

- Project performance, co-pollutant emissions, water use, and other environmental impacts of DOE-funded CCS and hydrogen co-firing projects, respectively, including pilot projects and Front-End Engineering Design Studies.
- Contaminated sites resulting from DOE activities and the status of cleanup efforts at those sites.

Climate Change and EJ

- DOE's actions and responses to address concerns raised by the WHEJAC Carbon Management Workgroup and other EJ groups.
- DOE's approach to considering and accounting for the impacts of climate change on energy infrastructure.
- The number of Community Benefits Plans associated with DOE-funded projects, including Regional Clean Hydrogen Hubs, that incorporate environmental health monitoring in surrounding communities.
- DOE's efforts to address households with high energy burdens.
- The number of weatherized housing units, including the geographic distribution of weatherized units and the demographic distribution of households benefiting from weatherization.
- Track communities facing carbon management projects of any sort to understand emissions increases, including co-pollutant emissions or other potential risks to the environment and human health.

Worker Training

- The number of training sessions conducted, including in DACs.
- Demographic data on individuals who received these trainings.
- Job placement numbers for trainees.
- Salary and longevity for jobs attained by trainees.

Solar Installation

- The number of housing units equipped with solar installations, including geographic distribution and demographic breakdown of beneficiaries.
- Demographic composition of developers, including community-based organizations, involved in solar installation projects, with information on their backgrounds and affiliations.

Department of Interior (DOI)

For the DOI, we provide the following recommendations for each bureau:

- Every bureau should provide a breakdown of the funds allocated to each state.

Bureau of Indian Affairs

- Provide a detailed report on the Tribes that have participated in climate-led voluntary community relocations, including the amount of funding allocated to each Tribe and the process implemented to safeguard Tribal rights.
- Outline the agency's strategies and initiatives to assist Tribes that applied for funding but did not receive it.
- Present a comprehensive overview of the broader outcomes resulting from climate adaptation planning efforts.
- Provide statistics on the number of homes in Tribal lands that have gained access to electricity and water through Tribal electrification and water programs.
  - Include data on the remaining homes in Tribal lands without access to electricity and water, contextualizing these figures with the overall need for these essential services.
- Offer a detailed report on the social services extended to Tribes by the agency, highlighting key programs, initiatives, and their impacts.
- Present information on the agency's efforts to expand co-stewardship activities with Tribes, emphasizing collaboration, partnerships, and outcomes achieved.
- Provide information on the number of Tribes that have achieved federal recognition during the reporting period.
- Detail the measures and actions taken by the agency to address the issue of missing and murdered Indigenous persons, including prevention, support, and resolution efforts.

Bureau of Indian Education

- Provide data on the schools in Indian country that are currently out of compliance with federal regulations and specify the number of schools that have successfully been brought into compliance.
- Present an update on the progress and status of school construction projects in Tribal areas.
- Disclose the financial resources allocated to support virtual learning, especially during emergency situations such as the COVID-19 pandemic. Provide clear figures and insights into the funding provided for virtual education initiatives.
- Furnish quantitative and spatial data on the subsequent metrics:
  - Schools impacted by lead contamination.
  - Drinking water quality in schools.
  - Schools that are affected by extreme heat.
  - Rates of asthma and other student health metrics.
  - Funding allocations directed towards heating and cooling in schools.
  - Maintenance and conditions of school buildings.
  - Indoor air quality within schools.
  - Outdoor air quality in the vicinity of schools.
  - The proportion of emergency-credentialed teachers in schools.

- Funding invested in community-based distributed renewable energy (e.g., rooftop solar and battery energy storage systems) for schools.

Bureau of Land Management (BLM)

- Provide a comprehensive report on the progress and steps taken for the remediation and cleanup of Tribal lands affected by nuclear and other hazardous waste.
- Identify and locate orphan wells close to DACs and ensure that the necessary measures, including capping, are promptly implemented. Share geospatial information to facilitate transparency.
- Provide a detailed breakdown of the permits submitted, approved, and rejected for the use of BLM land for oil and gas infrastructure, including their locations. Offer geospatial information for clarity.
- Furnish information on the permits submitted, approved, and rejected for the utilization of BLM land for wind and solar infrastructure. Include geospatial data to enhance transparency.
- Provide a comprehensive overview of the modifications implemented to controlled burns on BLM land, considering the heightened wildfire risk and their impact on wildfire prevention and mitigation.

Bureau of Ocean Energy Management (BOEM)

- Provide detailed information regarding offshore wind and OTEC facilities, including the number of facilities developed, the number of applications received, their locations, and the inclusion of community benefits plans in the applications.
- Describe BOEM's collaboration efforts with states to enhance community engagement in offshore wind projects and ensure sufficient involvement of local communities.
- Report on offshore drilling permits, including the total number of permits submitted, approved, and rejected, along with their specific locations, supported by geospatial data.

Bureau of Reclamation

- Report on the allocation of funding to individual states.

Bureau of Safety and Environmental Enforcement (BSEE)

- Describe the BSEE's comprehensive approach to actively involving communities in the sharing of critical information regarding local environmental conditions, with a particular emphasis on areas where these conditions may pose safety risks, ensuring effective communication and public welfare.

National Park Service (NPS)

- Report on efforts to guarantee equitable access to parks, such as creating a comprehensive report on the actions taken to establish parks within or close to DACs.
- Explain the NPS's initiatives to ensure that national monuments accurately represent the diversity of the nation.

Office of Insular Affairs

- Provide a comprehensive report detailing the conversion of dirty generators to solar and wind energy sources in US territories, and how many are community-based, distributed, and

decentralized. Include information on the total number of conversions, specific locations, and any additional relevant data pertaining to this transition.

Office of Surface Mining Reclamation and Enforcement

- Identify and provide geospatial information on the locations of abandoned mines situated near DACs, including the total number of such sites, and report on the progress made in cleaning up these sites, accompanied by specific numbers.

U.S. Fish and Wildlife Service

- Actively track and report the number of youths participating in the education and internship programs. Provide a detailed demographic breakdown of these participants. Additionally, monitor and disclose the number of program beneficiaries who secure employment, specifying the types of jobs they obtain.
- Implement and communicate proactive measures to assist individuals who may be at risk of toxic exposures resulting from the utilization of wildlife resources. Ensure that these measures are clearly outlined and readily available to the affected communities and individuals.

U.S. Geological Survey (USGS)

- Describe the measures taken by USGS to address health and safety concerns raised by EJ groups and communities regarding the implementation of geologic carbon sequestration projects.
- Elaborate on USGS's community engagement strategies aimed at sharing vital information concerning environmental conditions, with a particular focus on areas where safety concerns may arise, ensuring public awareness and well-being in or near DACs.

Department of Justice (DOJ)

For the DOJ, we recommend the agency to:

EJ Enforcement

- Provide a comprehensive report on the outcomes and results achieved through DOJ's EJ enforcement strategy.
- Disclose the details of enforcement actions done to address environmental laws and regulations violations in areas affecting DACs. This information should include geographic distribution via zip code or Census tract.
- Compile and report the total number of enforcement actions taken in response to environmental law violations impacting DACs. Include geographic details like zip codes or Census tracts to enhance transparency.
- Present data on the fines imposed as penalties for violations of environmental laws and regulations in areas affecting DACs, providing geographic breakdowns such as zip codes.

Accountability

- Maintain an updated record of open investigations related to voting rights infringements, along with concise descriptions of each case, given the relationship between advancement of environmental justice and community representation in government processes.

- Provide information on the number of police departments currently under investigation or operating under consent decrees, including their respective locations.
- Describe the agency's efforts to hold other federal agencies accountable for fulfilling their EJ obligations, ensuring transparency and cooperation.
- Provide a comprehensive account of Title VI complaints received and include updates on the status of each complaint.
- Disclose the number of criminal prosecutions initiated by the DOJ in response to violations endangering public health and the environment.

EJ Resources and Outreach

- Specify the allocated resources dedicated to supporting EJ initiatives within the agency.
- Report on the outreach efforts made by the agency to engage with overburdened communities.
- Describe the reporting schedule and the content of the reports generated by DOJ's EJ office.

Department of Labor (DOL)

For the DOL, we recommend the agency provide data on the following:

- The number of participants in the agency's worker training programs, their demographic details, and job placement outcomes.

Occupational Safety and Health Administration (OSHA)

- OSHA's progress in prioritizing safer chemicals, including phasing out the use of ethylene oxide, and processes to improve worker health and safety.
- The measures OSHA implemented to reduce the reported 37% increase in child labor and their outcomes.
- OSHA's efforts to address the rise in child labor within food production, including farm work and food processing, and the results.
- The agency's actions to tackle the increase in child labor within warehouse operations and the outcomes.
- OSHA's strategies for addressing disparities in occupational health outcomes.
- The agency's efforts to enhance worker safety in the context of extreme weather events.

Department of Transportation (DOT)

For the DOT, we advise the agency to provide the following:

Transportation Investments and Improvements

- Breakdown of investments from the agency's various programs, including detailed distribution data by geographic location.
- Data on EV charging station deployment and ownership, analyzed by demographic categories.
- Geographic deployment of mass transit options such as zero-emissions buses, including data at the zip code or Census tract level.
- Data on the improvements made to bus routes, including their locations and the communities they serve.
- Data regarding the agency's investments in micro-transit and their proximity to communities with limited access to both public and private transportation options.

- Details on precautions reinstated and measures undertaken to increase rail safety.

Community and Environmental Impacts

- The number of communities affected by highways that have been successfully reconnected through DOT's [Reconnecting Communities Pilot](#) Program.
- Report on DOT's efforts to track and reduce infrastructure contributions to climate risks, such as increases in impervious surfaces.
- Outline of how the agency has improved public transportation for DACs and description of its tracking mechanisms for monitoring these enhancements.
- Report discussing the measures implemented to reduce diesel emissions from heavy-duty vehicles, clarifying the tracking methods for their impacts, and presenting the quantifiable outcomes of these measures for affected groups, such as communities residing near roadways and goods movement hubs.
- Outline of efforts undertaken to minimize idling in trucks near ports, an explanation of the methods employed to monitor their effects, and the tangible results observed for port communities.
- Discuss the electrification of equipment and vehicles and onsite renewable energy charging facilities at ports.
- Description of the Federal Aviation Administration's strategies for addressing the impacts of airplane fuel, noise pollution, and other effects on communities near airports. Additionally, include information on the number of schools and residences that have undergone retrofitting to mitigate the environmental effects of aviation activity.
- Metrics reflecting how DOT has improved community engagement and participation in State Implementation Plans.

Pipeline and Hazardous Materials Safety Administration (PHMSA)

- Information on programs and initiatives undertaken by PHMSA that explicitly work to incorporate meaningful community participation prior to approval of new, or expansion of existing, pipeline infrastructure.
- Quantitative data regarding the presence of pipelines near DACs, along with spatial information on these pipelines. Additionally, specify the types of materials being transported through these pipelines.
- Comprehensive report detailing the historical numbers of pipeline accidents, incidents, and failures, particularly those occurring in proximity to DACs.
- Description of any modifications or updates to PHMSA regulations that have been implemented to address the health and safety concerns of fenceline communities.

Delta Regional Authority (DRA)

For the DRA, we recommend that the agency provide the following:

Economic and Demographic Data

- Detailed demographic characteristics of the individuals trained and the families affected by DRA programs.
- A location breakdown, using zip code or Census tract information, for investments and projects.

- Starting wage statistics categorized by demographics, with a specific focus on Indigenous populations.
- Geographical map highlighting the states or specific regions covered by the DRA.
- Job placement figures, distinguishing between temporary and permanent positions, with demographic details to offer insights into the workforce impact.

Program-specific Considerations

- For the [Public Works and Economic Adjustment Assistance](#) program, report the total investment amount, the number of projects per location (preferably at the zip code or Census tract level), and provide illustrations depicting the categories/types of projects to offer a comprehensive overview.
- For J40 covered programs, what DRA currently reports in the EJ Scorecard are inadequate programs; these are just plans. Include programs with material outcomes.

Department of Education (ED)

For the ED, we advise that the agency:

- Expand the list of covered programs to include initiatives (such as Healthy Schools) to ensure a more comprehensive evaluation.
- Disclose the financial resources ED allocated to support virtual learning, especially during emergency situations such as the COVID-19 pandemic. Provide clear figures and insights into the funding provided for virtual education initiatives.
- Furnish quantitative and spatial data on the subsequent metrics:
  - Schools impacted by lead contamination.
  - Drinking water quality in schools.
  - Schools that are affected by extreme heat.
  - Rates of asthma and other student health metrics.
  - Funding allocations directed towards heating and cooling in schools.
  - Maintenance and conditions of school buildings.
  - Indoor air quality within schools.
  - Outdoor air quality in the vicinity of schools.
  - The proportion of emergency-credentialed teachers in schools.

Environmental Protection Agency (EPA)

For the EPA, we recommend that the agency:

Cumulative Impacts Considerations

- Provide a timeline for releasing guidance on cumulative impacts.
- Specify how EPA plans to incorporate cumulative impacts considerations, or direct states to incorporate cumulative impacts considerations, in its decision-making processes.

Quantitative and Geographic Metrics

- Quantify the area that has transitioned from National Ambient Air Quality Standards (NAAQS) non-attainment to attainment and delineate its overlap with DACs.
- Provide data on the number of permits denied by EPA, categorized by permitting program and geographic location.

- Disclose information regarding the location of EPA air monitors by zip code or Census tract and demographics. Incorporate data on investments made to enhance air monitoring and illustrate changes over time, including in or near DACs.
- Report on the status of Superfund sites in proximity to DACs, detailing the number of sites cleaned up and providing progress updates on cleanup efforts.
- Offer quantitative data on water system performance, covering reporting violations, health-based violations, and infrastructure improvements, categorized by geographic location and demographics of those areas, and tracked over time.
- Provide data on the number of ongoing Title VI investigations, including their up-to-date status.
- Present quantitative data on EPA's financial investments in the retrofitting of school buses and include a geographic breakdown of these investments.
- Share data on EPA grants recipients, with a demographic breakdown and categorization by types of entities.
- Offer information on the locations where EPA has granted expedited permitting for Liquified Natural Gas facilities on brownfield sites.
- Provide data regarding the deployment of EPA's new EJ staff, specifying their assigned locations and detailing their responsibilities and activities.
- Furnish data on the status of Local Emergency Planning Committees (LEPCs), particularly those that serve DACs, and how meaningful opportunities for community participation in LEPCs are advanced.

Risk Management Program (RMP)

- Explain EPA's plan and/or efforts to ensure that RMP facilities incorporate measures to address the heightened risk of catastrophic incidents resulting from climate-related events.
- Demonstrate EPA's prioritization within the RMP program regarding the implementation of safer chemicals and processes to safeguard the health of both workers and fenceline communities.

Enforcement Actions

- Share data on the geographic distribution of EPA enforcement actions.
- Offer details on these actions' outcomes, including fines imposed and facilities compelled to cease operations.

Recommendations from CEJST and Carbon Management Workgroups

- Work with CEQ to improve data collection to report on the geographical distribution, size, and classifications of Comprehensive Animal Feeding Operations nationwide.
- Disclose the quantity and types of fossil fuel infrastructure (in all its various stages) located in EJ communities, particularly oil and gas infrastructure and extraction activities, including unconventional methods such as hydraulic fracking.
- Work with CEQ, HUD, and USDA to address the lack of national data that pinpoint communities lacking access to sewage and sanitation services.
- Identify and report on EJ communities with heat island risks by assessing trends related to extreme warm degree days or nights, neighborhood green space, tree canopy, and impervious surface.

- Track communities facing carbon management projects of any sort to understand emissions increases, including co-pollutant emissions or other potential risks to the environment and human health.

Response to Stakeholder Concerns and Recommendations

- Provide a detailed plan for EPA's response to EJ concerns regarding the proposed [New Source Performance Standards](#) for greenhouse gas emissions.
- Report on EPA's actions and responses to the recommendations proposed by the National Environmental Justice Advisory Council.

General Services Administration (GSA)

We recommend GSA address the following:

- Provide the demographic makeup of GSA's contractors.
- Explain how the agency integrates EJ principles into federal procurement processes to safeguard DACs from harm when sourcing products and services.

Department of Health and Human Services (HHS)

We recommend HHS provide the following data:

Health Outcomes

- Include various health outcomes, specifically focusing on issues like low birthweight, small-for-gestational age births, preterm births, and severe maternal morbidity. Collect these data with a particular emphasis on identifying and addressing persistent disparities rooted in social and environmental factors, particularly those related to race and economic status.
- Community health insurance coverage status by analyzing the proportion of individuals receiving Medicaid in relation to the total population eligible for Medicaid in that community. In addition to the data HHS retains, the U.S. Census Bureau can be a valuable source for obtaining other necessary data points for this metric.
- Track communities facing carbon management projects of any sort to understand emissions increases, including co-pollutant emissions or other potential risks to the environment and human health.

Low Income Home Energy Assistance Program (LIHEAP)

- Total funding allocated to [LIHEAP](#), including historical funding trends.
- The number of households that have received assistance through LIHEAP, including geographic distribution and a demographic breakdown of beneficiaries.
- The amount and proportion of LIHEAP funds specifically allocated for cooling assistance. Include geographic distribution, differentiation between rural and urban areas, and a demographic breakdown of beneficiaries.

National Institute of Health (NIH)

- A list of all NIH institutes and the number of covered programs within each of them. Currently, none of the NIH institutes have covered health research programs.

- For all NIH institutes, the quantity and types of partnerships established, including community-based organizations, non-profits, HBCUs, MSIs, and Tribal colleges.

Funding

- Breakdown of individual grant recipients by demographics and by the type of institution to which the recipient's home institution belongs (HBCU, MSI, Tribal college, community-based organization, non-profit organization) for each disciplinary area the NIH funds.
- Breakdown of reviewers by demographics, the type of institution to which the reviewer's home institution belongs (HBCU, MSI, Tribal college, community-based organization, non-profit organization), and experience with community engagement for each disciplinary area that NIH funds.
- The total amount of funding allocated to Community Services Block Grants and its detailed distribution among different regions, states, or communities.
- The number of Federally Qualified Health Centers awarded in DACs.

Investments

- Investment in CDC's National Center for Environmental Health, including historical changes in funding over time.
- Investment in CDC's National Environmental Public Health Tracking program, including historical changes in funding over time.
- Investment in the Indian Health Service, with historical funding changes over time.
- Investments made by HHS in substance abuse and behavioral health, with a focus on changes in funding since the onset of the COVID-19 pandemic.
- Investment in addressing the health impacts of climate change.

Feedback and Initiatives

- Feedback received from EJ communities regarding CDC's new cumulative Environmental Justice Index and the methods and strategies CDC employed to engage with these communities.
- Follow-up actions taken in response to the recommendations from the National Conversation on Public Health and Chemical Exposures report.
- Measures and initiatives undertaken by HHS, including CDC, to address environmental pollution and contamination as a public health issue.

Department of Housing and Urban Development (HUD)

For the HUD, we recommend the agency address the following:

Relocation and COVID Assistance

- Describe the process for relocation and how HUD coordinates with other agencies.
- Report the number of households that have been relocated, specifying their original and new locations.
- Share details, with quantitative data, about the assistance HUD has provided to households displaced due to financial hardship during the COVID-19 pandemic, including information by Census tract.
- Outline the long-term plans to address the impact on housing stability resulting from COVID-19.

Public Housing

- Provide data on HUD's total investment in public housing, including the trend over time.
- Report the number of approved demolitions of public housing, both aggregated and disaggregated geographically.
- Share information about the current public housing stock, both aggregated and disaggregated geographically, and how it has changed over time.
- Detail the number of public housing units that have been transferred to private development, both aggregated and disaggregated geographically, and explain, with quantitative data, how this has changed over time.
- Furnish data on the number of individuals on the waitlist for public housing, both aggregated and disaggregated geographically.
- Provide data on the number of individuals on the waitlist for Section 8 housing, both aggregated and disaggregated geographically.
- Describe HUD's plan for public housing in climate-vulnerable areas.
- Disclose HUD's investment in retrofits for public housing due to climate impacts.

Lead

- Provide a detailed account of HUD's financial commitments to lead hazard reduction initiatives.
- Disclose HUD's expenditure on educational efforts aimed at preventing lead poisoning.
- Report the number of housing units that have undergone lead remediation under HUD's initiatives and specify the number and percentage of units by Census tract or zip code.
- Provide data on the number and percentage of lead water service lines and infrastructure that federal agencies have replaced, specifying the locations of the projects.

Equity and Climate Considerations

- Provide statistics on fair housing investigations, including the number of open investigations, findings of discrimination, and findings of no discrimination, broken down by zip code or Census tract.
- Provide information on HUD's strategy for housing in areas susceptible to climate-related risks such as flooding, wildfires, extreme heat, and others.
- Present data on the agency's financial contributions to the Title VI Loan Guarantee program, including both aggregated and disaggregated geographical information.
- Disclose the agency's investments in homeless housing initiatives, presenting both aggregated figures and detailed geographic distributions.
- Work with CEQ, EPA, and USDA to address the lack of national data that pinpoint communities lacking access to sewage and sanitation services.
- Identify and provide information on regions facing severe deprivation where community members are residing in housing without access to essential amenities such as electricity, plumbing, or sewage systems. Give particular attention to addressing these challenges in rural locations, unincorporated areas, and colonias situated along the US-Mexico border.

National Aeronautics and Space Administration (NASA)

For NASA, we recommend the agency provide data on:

- The number and types of partners, such as community-based organizations, non-profits, HBCUs, MSIs, and Tribal colleges.
- The number of climate education grants awarded to community-based organizations.
- The number of universities involved in NASA programs, specifying the number of HBCUs, MSIs, and Tribal colleges among them, and funding provided by NASA for each category of institution.
- The agency's efforts to integrate EJ considerations into climate information analysis, particularly addressing overlapping risks like toxic exposures and climate vulnerabilities.
- The agency's measures to promote diversity among scientists.

National Science Foundation (NSF)

For the NSF, we recommend the agency:

EJ Integration Plan

- Incorporate EJ dedicated personnel into NSF and provide a timeline for this incorporation.
- Develop and EJ strategic plan and provide a timeline for its development.
- Detail the steps taken to ensure that funded research remains accountable to the communities in which the research is conducted.

Demographic and Institutional Breakdown for NSF Programs

- Break down individual grant recipients by demographics and by the type of institution to which the recipient's home institution belongs (HBCU, MSI, Tribal college, community-based organization, non-profit organization) for each disciplinary area the NSF funds.
- Break down reviewers by demographics, the type of institution to which the reviewer's home institution belongs (HBCU, MSI, Tribal college, community-based organization, non-profit organization), and experience with community engagement for each disciplinary area that NSF funds.
- Provide a breakdown of academic partnerships by type of institution (HBCU, MSI, tribal college, community-based organization, non-profit organization).
- Provide information on the Smart and Connected Communities program, including details on the geographic distribution and demographic composition of the participating communities.

Small Business Administration (SBA)

We direct the following recommendations to SBA:

- Identify and designate covered programs within its operations.
- Provide a demographic breakdown and geographic distribution data for recipients of [Guaranteed Loans](#) and [Disaster Loans](#).
- Offer detailed demographic breakdowns and geographic distribution information regarding beneficiaries of SBA's various programs to enhance transparency and accountability.

Tennessee Valley Authority (TVA)

For TVA, we recommend the agency:

Transparency and Reporting

- Identify and designate covered programs within its operations.
- Include a map illustrating the states or specific regions included under TVA initiatives for better contextual understanding.
- Present job placement figures, distinguishing between temporary and permanent positions, with demographic details to shed light on workforce impact.
- Share starting and current wage statistics and wage trajectory broken down demographically to understand income disparities among TVA personnel.
- Provide demographic data on TVA staff, including breakdowns by demographics and rates of promotion to promote diversity and inclusivity.
- In demographic breakdowns, include specific data regarding Indigenous populations.

Community and Environmental Impact

- Offer detailed location breakdowns, by zip code or Census tract, for investments and projects for increased transparency.
- Disclose data on the location and status of cleanup activities, including the disposal of waste related to energy infrastructure.
- Describe TVA's efforts in creating energy affordability and advancing energy justice to ensure equitable access to energy resources.
- Specify the number of community-based distributed renewable energy projects (such as onsite or rooftop solar) funded or supported by TVA and the number of homes that are served by those projects.

U.S. Army Corps of Engineers (USACE)

For the USACE, we advise that the agency:

Diversity and Community Engagement

- Report on the agency's progress and measures to diversify staff, considering both demographic diversity and disciplinary training.
- Detail the investments, whether in infrastructure or personnel, that the USACE has made to facilitate community engagement, including information regarding the opening of the agency's South Atlantic Division's Task Force Virgin Islands and Puerto Rico (VIPR).
- Identify the agency's partners and categorize them by types, including community-based organizations, non-profits, HBCUs, MSIs, and Tribal colleges.

Environmental Justice Impacts

- For the [Formerly Used Defense Sites Remedial Action Program](), present data on the number of sites, progress made in cleaning up FUDS, and provide geospatial information related to DACs.
- Explain the measures USACE is implementing to ensure equitable and just community relocations and describe the agency's collaboration efforts with other agencies to achieve this goal.

- Share information about the geographic and demographic distribution of communities benefiting from Civil Works projects, including the amounts received, under the following programs:
  - CAP 165 (Continuing Authorities Program) for small communities and DACs
  - [Tribal Nations Program](#)
  - [Flood Plain Management Services](#)
  - [Planning Assistance to States](#)
- Specify the number of projects that were denied based on EJ concerns and how many projects (of total) were amended to address these concerns.

Department of Agriculture (USDA)

We commend USDA for including agency profile information and offer the following recommendations for improvement:

- Address concerns regarding USDA's disclaimer in the list of covered J40 programs, which states, "These programs and funding line items are listed as covered under the Justice40 Initiative because of the inclusion criteria set. In practice, these items fund a broad array of different activities, and therefore will likely not be subject to the development of a comprehensive benefits methodology or reporting."[5]
- Provide information on USDA's support for Black farmers, specifically through loans, grants, or other measures.
- Describe how USDA is monitoring the effects of climate change on food costs, production, and scarcity, focusing on qualitative information.
- Instead of merely reporting the number of consultations with Tribal nations, provide explanations of the topics covered in these consultations and highlight concrete outcomes.
- Work with CEQ, HUD, and EPA to address the lack of national data that pinpoint communities lacking access to sewage and sanitation services.
- Provide data on initiatives by USDA to fund or support distributed renewable energy alternatives for small farmers, and how or whether those initiatives ensure preservation of agricultural land, particularly in places with food insecurity such as Puerto Rico and other island territories.

Supplemental Nutrition Assistance Program (SNAP) and Women, Infants, Children (WIC)

- Include metrics related to the Supplemental Nutrition Assistance Program (SNAP) and women, infants, and children (WIC), even if they are not covered under J40 programs.
- Report the total funding allocated to SNAP and WIC, along with changes in funding amounts over time.
- Offer a demographic breakdown of program recipients and provide data on their locations, including zip codes or Census tracts.

The following recommendations are tailored to each category of USDA's 65 [covered programs](#):

Agricultural Research Service

- Determine the funding allocation to HBCUs, MSIs, and Tribal colleges, providing a breakdown for each type of institution.

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[5] United States Department of Agriculture, *Justice40 Covered Programs List*, accessed November 17, 2023, 1, https://www.usda.gov/sites/default/files/documents/usda-justice-40-programs.pdf.

- Gather data on the number of students and faculty members who receive research funding, including their demographic characteristics for a comprehensive analysis.

Farm Service Agency

- Provide a demographic breakdown of farmers who receive the three types of loans offered by USDA: Direct Farm Operating Loans, Farm Storage Facility Loans, and Guaranteed Conservation Loans.

Forest Service

- Provide location data for activities contributing to the reclamation of mines and wells and specify the beneficiaries involved.
- Include details regarding the hazardous fuels being addressed in the Fuels Management Program and their specific locations.
- Collect geospatial data to adequately respond to the two recommendations above.

National Institute of Food and Agriculture

- Offer transparency regarding the nature and outcomes of the Bioproduct Pilot Program, identified by the USDA as a J40 covered program. Specifically, provide details about the program's scope and the specific bioproducts it generates.

Natural Resources Conservation Service

- Present the number and locations, by zip code or Census tract, of community gardens and urban farms supported.
- Provide details about reforestation efforts, including the amounts of funding allocated and the specific locations where these funds were directed. Additionally, share information about the outcomes of these efforts, such as changes in tree canopy and other relevant metrics.
- Report data regarding flood prevention initiatives, specifying the amounts of funding allocated and the locations where these funds were directed.

Rural Business-Cooperative Service

- Provide a demographic breakdown of loan and grant recipients, including their location.
- Specify the type of energy projects funded through grant and loan programs, including the location of each project and whether they ensure preservation of agricultural land, especially in places with food insecurity such as Puerto Rico and other island territories.

Rural Housing Service (RHS)

- Provide a breakdown of the demographics and locations of loan and grant recipients.
- Identify the locations of community facilities.

Relocation and COVID Assistance

- Describe the process for relocation and how RHS coordinates with other agencies.
- Report the number of households that have been relocated, specifying their original and new locations.

- Share details, with quantitative data, about the assistance RHS has provided to households displaced due to financial hardship during the COVID-19 pandemic, including information by Census tract.
- Outline the long-term plans to address the impact on housing stability resulting from COVID-19.

Public Housing

- Provide data on RHS's total investment in public housing, including the trend over time.
- Report the number of approved demolitions of public housing, both aggregated and disaggregated geographically.
- Share information about the current public housing stock, both aggregated and disaggregated geographically, and how it has changed over time.
- Detail the number of public housing units that have been transferred to private development, both aggregated and disaggregated geographically, and explain, with quantitative data, how this has changed over time.
- Furnish data on the number of individuals on the waitlist for public housing, both aggregated and disaggregated geographically.
- Describe RHS's plan for public housing in climate-vulnerable areas.
- Disclose RHS's investment in retrofits for public housing due to climate impacts.

Lead

- Provide a detailed account of RHS's financial commitments to lead hazard reduction initiatives.
- Disclose RHS's expenditure on educational efforts aimed at preventing lead poisoning.
- Report the number of housing units that have undergone lead remediation under RHS's initiatives.

Equity and Climate Considerations

- Provide statistics on fair housing investigations, including the number of open investigations, findings of discrimination, and findings of no discrimination, broken down by zip code or Census tract.
- Provide information on RHS's strategy for housing in areas susceptible to climate-related risks such as flooding, wildfires, extreme heat, and others.
- Present data on the agency's financial contributions to the [Title VI Loan Guarantee program](#), including both aggregated and disaggregated geographical information.
- Disclose the agency's investments in homeless housing initiatives, presenting both aggregated figures and detailed geographic distributions.
- Work with CEQ, EPA, and USDA to address the lack of national data that pinpoint communities lacking access to sewage and sanitation services.
- Identify and provide information on regions facing severe deprivation where community members are residing in housing without access to essential amenities such as electricity, plumbing, or sewage systems. Give particular attention to addressing these challenges in rural locations, unincorporated areas, and colonias situated along the US-Mexico border.

Rural Utilities Service

- Break down the funding allocations by the type of operations, such as family farms, corporate-owned farms, and non-profits, for the programs in this category.

- Provide detailed information on the allocation of investments for indoor plumbing and sanitation services, including demographic breakdowns, location data, and the number of families benefiting from these services.
- Similarly, offer comprehensive data on the allocation of investments for electricity provision, including demographic breakdowns, location specifics, and the number of families benefiting from these services.
- Ensure that demographic breakdowns include specific figures for Indigenous populations.

USDA Climate Hubs

- Provide descriptions of the Climate Hubs and their locations.
- The number of universities involved in these programs, specifying the number of HBCUs, MSIs, and Tribal colleges among them, and funding provided by USDA for each category of institution.

Department of Veterans Affairs (VA)

For VA, we recommend the agency provide data on:

- The number, percentage, and demographics of veterans who are experiencing health conditions as a result of environmental exposures experienced while in service and the number, percentage, and demographics of veterans who are being treated for those health impacts.
- The number of veterans receiving assistance for rent and the amount they received.
- The number of veterans who are homeless, their locations, and the measures taken to reduce veteran homelessness.
- The quantity and types of resources provided for education for veterans, along with a demographic breakdown and geographic distribution of these recipients.
- The agency's efforts to disseminate information about benefits and healthcare to veterans and their families.