Justice40 Walkthrough:

Tools and Metrics

February 8, 2023



OFFICE OF ECONOMIC IMPACT AND DIVERSITY

Agenda

- What is Justice40?
 - Refresher
 - Updates to guidance and reporting
- Program Design: Frameworks, Tools, Benefits, and Metrics
 - 1. NEVI: Electric Vehicle Chargers
 - 2. Example: Retrofits in Minnesota
- Question Results
- Q&A





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Justice40 Refresher



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What is the Justice40 Initiative?



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E.O. 14008, Section 223, January 27, 2021

"...the Director of the Office of Management and Budget, and the National Climate Advisor, in consultation with the Advisory Council, shall jointly publish recommendations on <u>how certain</u> <u>Federal investments</u> might be made toward a goal that 40 percent of the <u>overall benefits flow</u> to <u>disadvantaged</u> <u>communities</u>."

What are the Primary Elements of Justice40?



E.O. 14008, Sec. 223: <u>https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-</u> climate-crisis-at-home-and-abroad/ Interim Implementation Guidance for the Justice40 Initiative: <u>https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf</u>

J40: Defining Covered Federal Investments

OMB Guidance M-21-28:

Covered Investments. A "covered investment" is a Federal investment in one or more of the following categories:

- 1. Federal financial assistance as defined at 2 CFR 200,7 including both Federal grants as well as other types of financial assistance (including loans, credit, guarantees, or direct spending/benefits);
- 2. Direct payments or benefits to individuals;
- 3. Federal procurement benefits (acquisition of goods and services for the Federal government's own use);
- 4. Programmatic Federal staffing costs (e.g. federal pay for staff that provide technical assistance);
- 5. Additional federal investments under covered programs as determined by OMB.

DOE Justice40 Covered Programs | Department of Energy

"Existing and new programs, including those created by the Bipartisan Infrastructure Law (BIL), that make covered investments in any of [the previous] categories are considered Justice40 covered programs." **OMB Guidance**

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Over 140 DOE programs are covered under the Justice40 Initiative



J40: Covered Programs Across Gov (July 2022)

Justice40 Initiative | The White House

Agency	Abb.	J40 Covered Programs
Department of Energy (DOE)	DOE	144 ——
Department of Agriculture	USDA	65
Health and Human Services	HHS	13
Department of Transportation	DOT	39
Department of Housing and Urban Development	HUD	24
Department of Interior	DOI	65
Department of Veteran's Affairs	VA	1
Environmental Protection Agency	EPA	73

<u>Justice40-Covered-Programs-List_v1.1_07-15-2022.pdf (whitehouse.gov)</u> expect this list to evolve over time as new Federal programs are created or existing programs sunset DOE leading in J40 Programs with a commitment to delivering benefits in:

✓Climate change

✓ Clean energy and energy efficiency

✓ Clean transportation

✓ Affordable and sustainable housing

✓Training and workforce development

✓ Remediation and reduction of legacy pollution

✓ Critical clean water and waste infrastructure

J40: Defining Disadvantaged Communities (DACs)

DOE DAC Reporter Tool: Energy Justice Dashboard (anl.gov)



CEQ's CEJST Mapping Tool: Explore the map - Climate & Economic Justice Screening Tool



J40: DOE Resources



<u>Final DOE Justice40 General Guidance</u> 072522.pdf (energy.gov)

DOE Justice40 General Guidance



Justice40 Factsheet



Low-income commutities of color disproportionally bear the environmental horm and economic burders of the energy system and do not exploitly receive its benefits or have exploitate access to decision-racking processes. The clean energy transition presents on opportunity to transform commutities. Justice40 is the face to get there.

THE JUSTICE40 INITIATIVE

Created under the Biden-Harrin Administration, Justice40 establishes the goal that 40% of the averall benefits of certain federal investments flow to disadvantaged communities (DACs).

Justice40 Covered Program Highlights



List of Community Relevant Justice40 Programs

> Justice40 Initiative | Department of Energy

Justice40 and Inflation Reduction Act (IRA)

E.O. 14082, September 12, 2022

"In implementing the Act [IRA], all agencies...shall, as appropriate and to the extent consistent with law, prioritize... the **Justice40 Initiative**...to protect and improve the health and well-being of fence-line and frontline communities in the United States;



J40: Implementation Timeline



that fall under the Justice40 Interim Guidance.." OMB M-23-09, Addendum to the Interim Implementation Guidance for the Justice40 Initiative

Draft—Do Not Distribute

J40: DOE and CEJST DACs



What tools have you primarily used to identify communities of concern in your jurisdiction to date ?

1. DOE's DAC reporter tool

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<u>www.menti.com</u> Code: **2762 0198**

2. CEQ's CJEST mapping tool

3. State developed tools and resources

4. A combination of state and federal tools

5. I haven't started yet

Process: How to Develop a Justice40 Benefits Framework?



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Examples of how to develop a **communitycentered** Justice40 framework that can inform and **drive benefits to DACs**





Meaningful community engagement can improve outcomes by helping to inform decisions with the needs, interests, and concerns of affected stakeholders and groups.



Implement a Justice40 Framework Through Meaningful Community Engagement





Examples: Electric Vehicle Chargers

Joint Office Mission and Vision



Mission

To accelerate an electrified transportation system that is affordable, convenient, equitable, reliable, and safe.

Vision

A future where everyone can ride and drive electric.

NEVI Formula Program Guidance

Program Guidance: https://driveelectric.gov/technical-assistance/

Some highlights:

- EV charging stations installed every 50 miles within 1 travel mile of the highway or Interstate
- EV charging stations must include at least four 150kW DC Fast Chargers with Combined Charging System (CCS) ports capable of simultaneously charging four EVs;
- State EV Infrastructure Deployment Plans to include information on state agency coordination, utility consultation, public engagement, labor and workforce considerations, cybersecurity, and equity and Justice40 considerations.

The goal:

• National EV charging network that is convenient, reliable, and equitable



Status of NEVI Plan Review

Initial Plan Approvals O

- 52 plans approved
- \$900M in FY22 + FY23 funding released
- Over 75,0000 miles of the National Highway System covered
- <u>State Plans for Electric Vehicle Charging</u>. <u>Joint Office of Energy and Transportation</u> (driveelectric.gov)

Joint Office Technical Assistance

• Joint Office continuing outreach to states – focusing on implementation



EV Deployment Plans - NEVI - Environment - FHWA (dot.gov)

Charging and Fueling Infrastructure Discretionary Grant Program

STATUS: \$700M Notice of Funding Opportunity expected to be released in February/March. 2023

- \$2.5B discretionary grant program in BIL assigned to U.S. DOT (FHWA) and funded over 5 years
- DOE and Joint Office coordinating with DOT on development
- Key program to President's goal of 500,000 chargers and Justice 40



Community program: (\$350M)

strategically deploy publicly accessibly EV charging, hydrogen, propane or natural gas fueling infrastructure in communities.



Corridor Program (\$350M):

strategically deploy publicly accessible EV charging, hydrogen, propane, or natural gas fueling infrastructure along designated Alternative Fuel Corridors (AFCs)



Meaningful community engagement can improve outcomes by helping to inform decisions with the needs, interests, and concerns of affected stakeholders and groups.



Electric Vehicle Charging Justice40 Map

- U.S DOT and U.S. DOE developed a joint interim definition of DACs
- Consistent with interim J40 guidance
- Updated in May

Find more at:

https://www.anl.gov/es/electricvehicle-charging-equityconsiderations



Uses publicly available data sets that capture:

- Vulnerable populations
- Health
- Transportation access and burden

- Energy burden
- Fossil fuel dependence
- Resilience
- Environmental and climate hazards.

How State DAC definitions/analysis interact with the EV Charging Justice40 Map



California: lots of overlap



Some states supplemented the EV Charging Justice40 federal map of DACs with their own state map or analysis of equity indicators.



New York: State definition more rural and not much overlap

New Jersey: local definition more expansive

Draft—Do Not Distribute

PA: Stakeholder Engagement with DACs

1. Who they met with and what they asked them

2. What they said...

- Majority of advocacy and equity groups have been involved in planning for EV charging infrastructure.
- Majority of small businesses were unsure if they would apply for grant funding if they were required to provide the 20% match.
- Advocacy and equity participants recommended splitting high-use areas and environmental justice (EJ) areas as locations of priorities after AFC build out, community meetings, public transit & micro mobility hubs in low-income communities, and small and disadvantaged business enterprise (SBE/DBE) requirements to include in the NEVI State Plan to address equity.
- Participants recommended goals for the plan to include allowing for small businesses to have access to funding, accurate electric consumption reporting and billing for consumer, a process to analyze outcomes to adjust plan on an annual basis, and to tie into other state plans for EV deployment, environmental improvements, and equitable development.
- · Provide ample opportunities for community input.
- Leverage the federal Justice40 initiative to ensure benefits are shared equally by disadvantaged population.
- · Ensure accessibility at all charging sites.

3. How it was incorporated into the NEVI State Plan Development

Using Engagement to Inform NEVI State Plan Development

The stakeholder engagement sessions and surveys were instrumental in shaping and defining the development of the NEVI State Plan and will be used to guide future plan revisions, program processes and procedures. Examples of how input from engagement was used within the current plan includes the following:

Session/Survey	Examples of How Engagement Used					
	 The plan includes specific goals and objectives for equity that were developed with support of engagement input. 					
Advocacy and Equity	 The plan expanded discussion and emphasis on equitable development, outreach, and benefits, which are essential to the NEVI Program. 					
	 PennDOT is working to further enhance ways to ensure small and disadvantage business enterprises are aware of and have opportunities to compete for NEVI formula funding. 					

Attachment: Example Equity Stakeholders and discussion questions

- Gov. Commission on Latino, APA, LGBTQ, African-American Affairs
- NAACP
- PA Developmental Disabilities Council

Advocacy and Equity

Outreach Highlights

Groups

- The African-American Chamber of Commerce of W. PA
- US EPA EJ WG

Who might you engage to meaningfully address equity in your state NEVI efforts?

- 1. Clean Cities Coalitions
- 2. Community-based or Environmental Justice Orgs
- 3. Housing or social services orgs
- 4. Minority- and women- owned businesses
- 5. Tribal governments
- 6. Workforce training orgs
- 7. Local financial institutions
- 8. Other

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Examples of how to develop a communitycentered Justice40 framework that can inform and **drive NEVI benefits to** DACs



National EV Charging Infrastructure Could Provide Multiple Benefits to Disadvantaged Communities



Example Benefits Metrics

Example Benefits	Exan	nple Metrics for Measuring Benefit
Improving clean transportation access through the	•	Number of EV charging infrastructure installed in or near DACs or the increase
location of chargers;		in density of EV chargers.
Decreasing the transportation energy cost burden	•	Net petroleum fuel reduced displaced by electric transportation in DACs [GGe]
by enabling reliable access to affordable charging;	•	Dollars saved [\$] in transportation petroleum fuel costs for DACs.
Increasing access to low-cost capital to increase	•	Dollars spent [\$] on EV charging infrastructure owned by or providing revenue
equitable adoption EVs and EV Charging		to organizations located in DACs
Infrastructure	•	Number of and % of EV charging infrastructure owned by organizations located
		in DACs
	•	Number of and % of EV charging infrastructure owned that provide revenue to
		organizations located in DACs
Increasing wealth in communities, including	•	Businesses in DACs within a certain proximity of DCFC
through enterprise creation and contracting in	•	Increase in revenue to DAC member-owned businesses
DACs;	•	Proportion of NEVI investments in DACs
	•	Number of contracts and/or dollar value [\$] awarded to small businesses that
		are principally owned by women, minorities, disabled veterans, and/or LGBT
		persons such as charging station service providers .

Sources: Joint Office; Zhou, Yan, Gohlke, David, Sansone, Michael, Kuiper, Jim, and Smith, Margaret P. Using Mapping Tools to Prioritize Electric Vehicle Charger Benefits to Underserved Communities. United States: N. p., 2022. Web. <u>https://doi.org/10.2172/1870157</u>.

Example Benefits Metrics

Example Benefits	Example Metrics for Measuring Benefit
Increasing the clean energy jobs, job pipeline, job training in DACs;	 Dollars spent [\$] on job training programs for participants from DACs Number of participants from DACs in job training, apprenticeship, and STEM education programs. Number of hires or jobs created resulting from DAC installation or related job growth opportunities.
Increasing energy resilience;	 Number and size (in megawatt hour) of community resilience infrastructure deployed in DACs (e.g., potentially pairing EV charging infrastructure with distributed solar and/or battery energy storage or as part of a microgrid).
Increasing equitable access to the electric grid; and	 Stakeholder investments in increased electrical service to DACs to prepare sites for NEVI investments in EV charging infrastructure (e.g., dollars spent [\$], # of EV charging infrastructure locations affected, utility filings to increase electrical service in DACs) Stakeholder investments in electrified transportation hubs in DACs co-located with NEVI investments in EV charging infrastructure such as shared electric micromobility devices (e.g., dollars spent [\$], # of EV charging infrastructure locations affected)

Sources: Joint Office; Zhou, Yan, Gohlke, David, Sansone, Michael, Kuiper, Jim, and Smith, Margaret P. Using Mapping Tools to Prioritize Electric Vehicle Charger Benefits to Underserved Communities. United States: N. p., 2022. Web. <u>https://doi.org/10.2172/1870157</u>.

OH: Identified Potential Benefits from Early Engagement

Table 32: Benefits, Metrics and Data Sources

Benefit	Metric	Data Source
Improve clean transportation access through the location of chargers	Distance to nearest charger from DAC Charger utilization by user's home zip code	Justice40 mapping tool (for DAC locations); EV charger locations from NEVI plan/implementation
Reduce environmental exposures to transportation emissions	Air quality metrics Emissions reduction actual/potential based on shift from ICE to EVs	ODOT traffic volumes/projections for AFCs
Provide charging infrastructure for shared-ride vehicles	Chargers located at or near vehicle bases/along routes?	EV charger locations from NEVI plan/implementation; ride share location/route data
Increasing community cohesion through program design and public involvement	Number of meaningful public involvement activities engaging members of disadvantaged communities	ODOT engagement records; community organization feedback
Establishing community-based partnerships	Number of partnerships developed / maintained with community-based organizations for NEVI program	ODOT/JobsOhio records
Increase the clean energy job pipeline, job training, and enterprise creation in disadvantaged communities	Number of clean energy-related job training/upskilling opportunities leveraging charger planning, installation, operation and/or maintenance	JobsOhio, community colleges/education partners, community organizations/MPOs

Arizona, California, New Jersey, Oregon also provide specific metrics and potential data sources.

•

•

Arizona included a unique benefit category of *"increasing access* through alternative payment options" ³⁴ Which benefits of building EVSE might be of highest priority to DACs in your state?

- 1. Access to clean transportation
- 2. Energy democracy
- 3. Decreasing transportation cost burden
- 4. Disadvantaged business opportunities
- 5. Energy resilience
- 6. Jobs and job training
- 7. Reducing transportation emissions
- 8. Other

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DriveElectric.gov

- Request technical assistance via the contact form
- Find data and tools
- Sign up for events or view recorded events
- Find career opportunities
- Sign up for office alerts
- Phone: <u>833-600-2751</u>



U.S. Department of Energy U.S. Department of Transportation

FuelEconomy.gov Alternative Fuels Data Center

A modernized and interagency approach to support the deployment of zero-emission, convenient, accessible, equitable transportation infrastructure The Joint Office of Energy and Transportation was created through the Bipartisan Infrastructure Law (BIL) to facilitate collaboration between the U.S. Department of Energy and the U.S. Department of Transportation. The Joint Office will align resources and expertise across the two departments toward leveraged outcomes. The office will be a critical component in the implementation of the BIL, providing support and expertise to a multitude of programs that seek to deploy a network of electric vehicle chargers, zero-emission fueling infrastructure, and zero-emission transit and school buses. The scope of the Joint Office will continue to evolve as directed by both departments.

Contact us Technical assistance

Examples:

Retrofits



OFFICE OF ECONOMIC IMPACT AND DIVERSITY Goals should be Specific, Measurable, Achievable, Relevant, and Timely.



J40: An Accounting and Accountability Framework

One way to think about what your goals are with a J40 program is to think in an XYZ format:

Achieving [X] as measured by [Y] by doing [Z]

- X = policy priority in DACs
- Y = metric
- Z = program functions



Examples of how to develop a **communitycentered** Justice40 framework that can inform and **drive benefits to DACs**



Example: Building Retrofit Program in MN



J40: DOE Policy Priorities in DACs (the "X")

Policy Priorities

- 1. Decrease in energy burden
- 2. Decrease in environmental exposure and burdens

What

- 3. Increases in jobs/training
- 4. Increases in enterprise creation
- 5. Increases in energy democracy
- 6. Increases in low-cost capital
- 7. Increases in clean energy access and adoption
- 8. Increases in energy resilience



J40: Example metrics (Y) for selected activities (Z)

Retrofits	Transp.	Government, Schools	Financial Instruments	Renewable Energy	Building Codes and Standards	Energy Policy and Planning	Energy Audits	Training and Education	Stakeholder Engagement
Number of buildings retrofitted	Number of alternative fuel vehicles purchased	Number of energy efficient: HVAC units purchased, streetlights,	Number of loans given	Number of PV, wind, or solar thermal systems installed	Number of new building codes adopted	Number of CAPs updated or completed	Number of audits performed (investment and non-investment)	Number of orgs receiving TA (Tribal, rural, DAC?)	Number of community engagement events
Estimated retrofit savings	Number of new alternative refueling/st ations installed	Number of energy efficient lights purchased	Value of grants provided	Total capacity of systems installed		Number of policies developed or updated (DACs?)		Number of employees hired to further EE or sustainability	Community attendance
Reduction in fuel consumption	Length of sidewalks installed (linear feet)	Number of energy efficient water heaters purchas ed	Total value of money raised	Number of geothermal or hydropower		Number of GHG inventories completed		Number of workshops or training sessions held	Community benefits agreement

Don't Forget! Where can these numbers be attributed? Who is benefitting?

Example: Building Retrofit Program in MN

v ·							
Х Ро	olicy Priorities		Retrofits	Energy Audits	Government, Schools	Financial Instruments	Renewable Energy
1.	. Decrease in energy burden						
2.	. Decrease in environmental exposure and burdens	Υ	Number of buildings retrofitted	Number of audits	Number of energy efficient:	Number of loans given	Number of PV, wind, or solar
3.	. Increases in jobs/training			performed	HVAC units purchased, streetlights,		thermal systems installed
4.	. Increases in enterprise creation		Count	Count	Number of	Value of	Total capacity of
5.	. Increases in energy democracy		retrofit savings		energy efficient installations/ appliances/	grants provided	systems installed
6.	. Increases in low-cost capital		Model		lights purchased		
7.	. Increases in clean energy access and adoption		Reduction in fuel consumption		Number of energy efficient water	Total value of money raised	Number of geothermal or hydropower
8.	. Increases in energy resilience		Model		heaters purchas ed		

+ Metric

Example Finding and Understanding DACs (MN Example)

Place-based information can help prioritize recipients

CEJST DACs



Why are they classified as DACS?

Explore the map - Climate & Economic Justice Screening Tool (geoplatform.gov)

Thresholds Triggered:

<u>Kitteson:</u>

Climate Change - Expected Building Loss Rate + Low Income Energy - Energy Cost + Low Income

<u>Beltrami #2</u>

Climate Change – Expected Ag Loss Rate + Low Income Energy – Energy cost + Low Income Health – Asthma, Diabetes, Heart Issues, Low Life Expectancy + Low Income Transportation – Transport Barrier + Low Income

Workforce Development – Unemployment + HS education

Using the DOE tool to learn about DACS- Energy Burden

Energy Justice Dashboard (anl.gov)

Report for: 27069090100 (**Kittson**) Report for: 27007940001 (**Beltrami**)



Using the DOE tool to learn about DACS - Renters



This information can help in program

Explore 36 DOE Indicators to learn about a place

ENERGY BURDEN (5)

Transportation Burden Energy Burden Non-grid connected home heating fuel Power outages Duration of outages

FOSSIL DEPENDENCE (2)

IWG coal jobs ratio IWG fossil energy jobs ratio

VULNERABLE POPULATIONS (19)

Housing burden Food desert Job access (-) Park access (-) Commutes > 30 mins* No vehicle* Unemployed Low Income* No GED* Linguistic Isolation* Renters* No internet Uninsured Disability Incomplete plumbing Single parents Mobile homes Unhoused Age over 65*

ENVIRONMENTAL/ CLIMATE HAZARDS (10)

Lead paint Diesel particulates Cancer Traffic volume Water discharge NPL sites RMP facilities TSD facilities FEMA climate risk PM 2.5

* Denotes that these variables are not inherently negative, but increase the vulnerability of the population to climate, environmental, and energy hazards

Additional Tools – To compare locations

- Own State Information
- LEAD data tool

Beltrami – SVI: 77.71

Avg. Energy Burden (% Income) for Minnesota vs Census Tract 9400.01 vs Census Tract 9400.02





- You may have to ask your recipients for data build it into your contracts
- You may need to model, estimate or count
- DOE is making tools available to make this possible, but you may have your own tools
- We focused on the where (place-based) due to the nature of the program ("Z"= retrofits) --- sometimes the demographic information for the "who" will be more important (for example with job training as the objective or policy priority to achieve or number of jobs created.

Additional Data Analysis Tools

- State and Local Planning for Energy (SLOPE) tool (<u>https://maps.nrel.gov/slope</u>).
- Low-Income Energy Affordability Data (LEAD) -(<u>https://www.energy.gov/eere/slsc/maps/lea</u> <u>d-tool</u>).

Data and Tools - Alphabetical Listing | NREL



Share an XYZ example for your state

Achieving [X] as measured by [Y] by doing [Z]

Policy Priorities

- 1. Decrease in energy burden
- 2. Decrease in environmental exposure and burdens
- 3. Increases in jobs/training
- 4. Increases in enterprise creation
- 5. Increases in energy democracy
- 6. Increases in low-cost capital
- 7. Increases in clean energy access and adoption
- 8. Increases in energy resilience

- X = policy priority in DACs
- Y = metric
- Z = program functions

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Who might you engage to meaningfully address equity in your state NEVI efforts?



1

Go to www.menti.com and use the code 1781 1383

Which benefits of building EVSE might be of highest priority to DACs in your state?

Mentimeter



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Go to www.menti.com and use the code 1703 0425

Share an XYZ example for your state: "Achieving [X] as measured by [Y] by doing [Z]"?

Mentimeter

Appendix



OFFICE OF ECONOMIC IMPACT AND DIVERSITY **Question:** My state has its own tools and definition to identify DACs or communities of concern (e.g., "environmental justice community", etc.), can we use our tools and definitions?

OMB M-23-09: Federal agencies should identify ways to encourage use of the CEJST. If the use of other environmental justice screening tools, such as those developed by some states, would be allowed, then the relevant agency should ensure that there are <u>robust safeguards and minimum criteria in place that</u> <u>conform to the Justice40 Interim Guidance</u>.



Federal and State Tools and Definitions Alignment Recommendations:

 The communities of concern identified by the state tool or definition conform to the definition of communities established in OMB guidance (<u>https://www.whitehouse.gov/wp-</u> content/upleads/2021/07/M-21-28.pdf):

"Community" is defined as either a group of individuals living in geographic proximity to one another, or a geographically dispersed set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions."

3. The communities of concern identified by the state tool or definition is currently mapped in software or can be easily overlayed in GIS so that communities can be easily identified by stakeholders.

- 2. The state tool or definition considers two or more of the OMB Guidance indicators when identifying communities that should be classified as "disadvantaged" for the purposes of directing federal investments under Justice40:
 - · Low Income,
 - · High unemployment and underemployment,
 - Disproportionate environmental stressor burden and high cumulative impacts, etc.,
 - · High housing cost burden and substandard housing,
 - Disproportionate impacts from climate change
 - High energy cost burden and low energy access
 - Jobs lost through the energy transition
 - Access to healthcare
 - Racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities
 - High transportation cost burden and/or low transportation access







OMB M-23-09: Addendum to the Interim Implementation Guidance

Climate and Economic Justice Screening Tool



M-23-09 (whitehouse.gov)

"Agencies shall use best efforts to transition to using the CEJST as expeditiously as possible. By the start of fiscal year 2024 (i.e., October 2023), agencies are expected to use the CEJST for any <u>new</u> covered investments that fall under the Justice40 Interim Guidance.."

"For these existing covered programs with open funding announcements, agencies are not expected to switch to using the CEJST. Rather, as agencies issue new funding announcements for covered programs, agencies are expected to use the CEJST to geographically identify disadvantaged

communities, to the maximum extent permitted by law." OFFICE OF ECONOMIC IMPACT AND DIVERSITY

