GGRF Accomplishment Reporting

Specific Instructions

1. Necessity of Collection

This is a new Information Collection Request (ICR). This ICR covers the collection of information from those organizations that receive grants funding from the Environmental Protection Agency (EPA) under the authority of Section 134 of the Clean Air Act (CAA). CAA 134 was enacted as part of the Inflation Reduction Act (IRA) and authorizes EPA to make competitive grants to States, municipalities, Tribal governments, and eligible non-profit recipients to implement the Greenhouse Gas Reduction Fund, a historic \$27 billion investment to combat the climate crisis by mobilizing financing and private capital for greenhouse gas- and air pollution-reducing projects in communities across the country. CAA 134 requires that EPA obligate the \$27 billion in grant funding by September 30, 2024. EPA anticipates awarding grants and/or cooperative agreements depending on the level of federal involvement.

Through the GGRF program, EPA is conducting three competitions. This ICR covers the collection of information under awards for all three competitions, described below:

- The \$14 billion **National Clean Investment Fund** competition will finance clean technology deployment nationally. Specifically, it will provide grants to 2–3 national non-profit financing entities to create national clean financing institutions capable of partnering with the private sector to provide accessible, affordable financing for tens of thousands of clean technology projects nationwide.
- The \$6 billion **Clean Communities Investment Accelerator** competition will finance clean technology deployment in low-income and disadvantaged communities while simultaneously building the capacity of community lenders that serve those communities. Specifically, it will provide grants to 2–7 hub non-profit entities that will provide funding and technical assistance to specific industry networks of public, quasi-public, not-for-profit, and non-profit community lenders, supporting the goal that every community in the country has access to the capital they need to deploy clean technology projects in their homes, small businesses, schools, and community institutions.
- The \$7 billion **Solar for All** competition will spur adoption of clean distributed solar energy that lowers energy bills for millions of Americans in low-income and disadvantaged communities. Specifically, it will provide up to 60 grants to states, territories, Tribal governments, municipalities, and eligible non-profit entities to expand the number of low-income and disadvantaged communities primed for distributed solar investment—enabling millions of low-income households to access affordable, resilient, and clean solar energy.

With this ICR, EPA seeks authorization to collect information from GGRF grant recipients (Recipients) using several standard forms that will streamline the data collection effort and improve the quality of information collected.

The information collected under this ICR supplements the minimum reporting and record keeping requirements that Recipients are subject to under 2 CFR Part 200 and 2 CFR Part 1500 that are covered by ICR 0938.22, EPA's General Administrative Requirements for Assistance Agreements. EPA estimates that all parties who voluntarily respond to this information collection by electing to participate in the GGRF program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

2. How, By Whom, and For What Information is Collected

While the EPA collects basic grant Recipient information as part of its federal stewardship responsibilities to manage and oversee Recipient activities and expenditures, EPA requires additional information from Recipients to be reported in a consistent manner to evaluate the effectiveness of the GGRF program and to report on program activities and accomplishments to Congress and other program stakeholders. EPA will use the information collected from Recipients to oversee the activities carried out using GGRF funds, to evaluate program implementation and effectiveness, and to meet the EPA's responsibilities under the Government Performance and Results Act to report on GGRF program accomplishments. Without the information collection, EPA would have limited access to information needed to effectively assess the relationship between those activities funded by the GGRF grants and the intent of Congress with the passage of the Inflation Reduction Act.

In accordance with 2 CFR § 200.329, each grantee will be subject to program performance reporting requirements. EPA will require each grantee to submit quarterly performance reports within 30 days after the end of each reporting period (and with additional requirements every fourth quarterly report i.e., annually) as well as a final performance report within 90 days after the end of the period of performance. EPA will use information from these reports as part of programwide public reporting as well as in response to Freedom of Information Act (FOIA) requests, except to the extent such information includes confidential business information (CBI) or personally identifiable information (PII) pursuant to 2 CFR § 200.338. Note that EPA will only collect reporting information from each Recipient (rather than from any subrecipients), but each Recipient may need to collect reporting information from subrecipients in order to meet these reporting requirements.

The types of information below will be collected from GGRF Recipients, which may be collected at various levels—from the program level to the project level (i.e., each project funded under this program):

- **Program activities/grant expenditures:** EPA will collect information on program activities and grant expenditures, which will include reporting data on:
 - o Grant funds deployed, by type of cost;
 - Funds for financial assistance deployed to projects, with details at the project level (e.g., origination date, origination fees, funding amount, financial product type,

¹ Information claimed as CBI in accordance with this Notice will be disclosed only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B.

- transaction characteristics, project type, basic counterparty information, private capital mobilization) and ultimately aggregated for all the projects supported by each grantee;
- o Funds for technical assistance deployed to projects, with details at the project level and ultimately aggregated for all the projects supported by each grantee;
- o Reports on program feedback from stakeholders participating in the program;
- o Planned program activities, including current transaction pipeline; and
- Other pertinent information, including information specific to each competition
- Environmental outputs and outcomes: EPA will collect information on environmental outputs and outcomes, which will include reporting the following types of outputs and outcomes aligned to the three GGRF program objectives as well as disclosing the methodologies, inputs, and assumptions used to track and report outputs and outcomes:

• Climate and air pollution:

- Details on projects financed (e.g., number of homes retrofitted, number of electric vehicle chargers financed, etc.);
- Details on projects deployed (e.g., solar capacity installed, storage capacity installed);
- Greenhouse gas emissions reduced and avoided (carbon dioxide, hydrofluorocarbons, methane, nitrous oxide, perfluorocarbons, and sulfur hexafluoride);
- Other air pollutants reduced and avoided; and
- Other pertinent information, including information specific to each competition.

o Equity and community benefits

- Details on projects financed (e.g., by benefit type, by community type);
- Details on projects deployed (e.g., by benefit type, by community type);
- Number of businesses receiving financing for projects;
- Total investment in low-income and disadvantaged communities;
- Clean energy and energy efficiency outcomes (e.g., reduction of energy burden; deployment of clean energy; establishment of communitywide microgrids);
- Clean transportation outcomes (e.g., access to clean, high-frequency transportation; access to affordable electric vehicles, charging stations, and purchase programs);
- Affordable and sustainable housing outcomes (e.g., improved indoor air quality; reduced housing cost burden);
- Training and workforce development outcomes (e.g., increased participation in clean energy good job training and subsequent good job placement/hiring, including providing the free and fair chance to join a union and collectively bargain);
- Other types of outcomes (e.g., community wealth/ownership, resilience benefits, entrepreneurship); and
- Other pertinent information, including information specific to each competition.

• Market transformation:

Details on grant funds deployed to projects;

- Capital mobilization details, including private capital mobilization and mobilization ratios;
- Details on market-wide changes to financing emissions- and air pollutionreducing projects;
- Details on support for community lenders and resulting capacity-building;
 and
- Other pertinent information, including information specific to each competition.
- **Program evaluation and other evidence-building activities:** EPA will collect findings from evidence building activities on program operations, impact, outcomes including but not limited to program evaluation reports, in adherence with ORDER 1000.33 03/25/2022 U.S. Environmental Protection Agency Policy for Evaluations and Other Evidence-Building Activities, including timely publication of findings.
- Organizational financial statements and disclosures: EPA will collect organizational information through financial statements and disclosures, which may include:
 - Management's discussion and analysis of financial condition and results of operations;
 - Consolidated financial statements and notes;
 - o Scope 1 and 2 emissions; relevant categories of Scope 3 emissions;
 - o Executive and board compensation disclosures;
 - o Additional board disclosures (e.g., board meeting records); and
 - Other pertinent information, including information specific to each competition
- Other pertinent information: EPA may collect other categories of pertinent information, including information specific to each competition.

In addition, EPA will require each Recipient under the National Clean Investment Fund and Clean Communities Investment Accelerator to:

- Provide timely disclosure of the Recipient's events including, for example, completion of
 acquisition or disposition of assets; material impairments; changes in certifying
 accountants; non-reliance on previously issued financial statements; election, appointment,
 or departure of directors or management; and new contractor or subrecipient contracts
 substantially related to program execution; and
- Respond to reasonable requests from EPA, from time to time, pursuant to 2 CFR § 200.337(a), for information regarding the Recipient's operations, business affairs, plans, financial condition and projections, and compliance with the terms of the award agreement to the extent that this information is pertinent to the EPA financial assistance award.

3. Electronic Submission

EPA will provide additional information to assist Recipients with compliance against financial and program performance reporting requirements.

EPA will allow Recipients to charge the grant awards for costs that support data reporting to ensure that respondents with limited resources are able to comply with reporting requirements without undue burden.

4. Non-duplication

There is no other known source for the scope of information that EPA seeks under this ICR. Moreover, this ICR supplements, and does not duplicate, the information that EPA collects as part of its reporting and record keeping provisions under the EPA's grant requirements. This ICR addresses the burden imposed on Recipients and EPA associated with the reporting requirements that are unique to grants awarded by EPA under authority of GGRF competitions.

5. Impact on Small Businesses

This information collection request is expected to affect Recipients and subrecipients of GGRF funding. EPA has considered whether to establish different reporting requirements for small entities and has determined that: (1) different reporting requirements among Recipients will result in inconsistent data that may lessen the EPA's ability to oversee and report on program activities and accomplishments; (2) the GGRF program is voluntary and parties who elect to participate in this program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

6. Consequences of Non-Collection or Less Frequent Collection

The information collection schedule is consistent with the Agency's reporting schedule for general assistance agreements. Less frequent collection may not enable EPA to oversee and manage GGRF grants effectively and would lessen GGRF's ability to report up-to-date and accurate information on program activities and accomplishments.

7. Special Reporting Requirements

In general, the information collection requirements covered by this ICR adhere to the guidelines stated in the 1995 Paperwork Reduction Act as amended, OMB's implementing regulations, EPA's Information Collection Review Handbook, and other applicable OMB guidance. This ICR does not exceed any of the OMB guidelines found 5 CFR 1320.5(d)(2).

8. Federal Register Notice and Consultation

Consultation with staff from other Federal agencies with similar reporting requirements will be undertaken. EPA will also directly consult with applicants to ask them specific questions about the burden associated with completing the data collection covered in this ICR. Recipient responses will form the basis of EPA's calculations of the burden hours and costs.

These consultations will include discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden. Additional efforts to consult with potential respondents to obtain their views on the availability of data, clarity of instructions, etc., may be undertaken in finalizing reporting systems.

9. Payment or Gift to Recipients

No payment or gift is given to Recipients.

10. Assurance of Confidentiality

EPA will use information from these reports as part of program-wide public reporting, except to the extent such information includes CBI or PII pursuant to 2 CFR § 200.338. Information claimed as CBI in accordance with this Notice will be disclosed only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B.

11. Questions of Sensitive Nature

Sensitive questions are not associated with the information collection activities.

12. Hour Burden

A variety of instruments and platforms will be used to collect information from Recipients. EPA will estimate the total annual cost burden after consulting with relevant parties on the reporting framework.

EPA anticipates that this estimate will include:

- Indicating the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.
- Providing separate hour burden estimates for each form and aggregating the hour burdens.
- Providing estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The estimated Recipient burden will be incurred by the following activities:

- Quarterly report submission with details on program performance, including:
 - o program expenditures
 - closed financial transactions
 - o current pipeline of financial transactions
 - o financial reporting (including)
 - consolidated financial statements and notes
 - performance against specified financial ratios/covenants
 - board disclosures
- Annual report submissions with details on program performance, including:
 - o program expenditures
 - closed financial transactions
 - o current pipeline of financial transactions
 - o climate and environmental outputs and outcomes
 - o equity and community benefits outputs and outcomes
 - o market transformation outputs and outcomes (including)
 - illustrative case studies
 - financial reporting (including)

- consolidated financial statements and notes
- performance against specified financial ratios/covenants and board disclosures
- scope 1 and 2 emissions
- scope 3 emissions
- compensation disclosures
- Final reports focused on program performance focused on program performance, including:
 - o program expenditures
 - closed financial transactions
 - o current pipeline of financial transactions
 - o as well as climate and environmental outputs and outcomes
 - o equity and community benefits outputs and outcomes
 - o and market transformation outputs and outcomes (including)
 - illustrative case studies

13. Estimate for total annual cost burden (not including hour burden)

EPA will estimate a total annual cost burden after consulting with relevant parties on the reporting framework.

EPA anticipates that this cost estimate will include:

- a total capital and start-up cost component (annualized over its expected useful life)
- a total operation and maintenance and purchase of services component.

14. Annualized Costs to the Federal Government

EPA will estimate a total annualized cost to the federal government after consulting with relevant parties on the reporting framework.

EPA anticipates that this cost estimate will include the quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

15. Reasons for Program Changes or Adjustments on Burden Worksheet

This is a new collection, and so does not involve any program changes or burden adjustments.

16. Published Results

To enable more transparent public examination of federally funded activities, the information collected under this ICR will be published in three ways:

- GGRF will post it on EPA public websites.
- EPA will collate program-level information for inclusion in public reports such as the Annual Performance Report mandated by the Government Performance and Results Act

- (GPRA) and annual reports on progress of activities supported by supplemental funds (e.g., Bipartisan Infrastructure Law, Inflation Reduction Act).
- EPA will use this information to respond to requests from the Executive and Legislative branches for data and information.

Information will be reported in anonymous and aggregated form where necessary to protect CBI and PII. Location identifiers will be used to fulfill federal reporting requirements (e.g., DATA Act, Justice40 Initiative) to document results in different communities. EPA will follow best practices in stating the source of the data (e.g., grant progress reports) and the methodology used to collect the information (e.g., self-report).

17. Approval for not displaying OMB Expiration Date

N/A

18. Exceptions to the "Certification for Paperwork Reduction Act Submissions"

N/A