



# EQUITY ACTION PLAN

U.S. ENVIRONMENTAL PROTECTION AGENCY

February 14th, 2024

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## AGENCY EQUITY TEAM LEAD: Karim D. Marshall

### (1) Message from Administrator Regan

The Environmental Protection Agency's [2023 Equity Action Plan](#) reflects our Agency's unwavering commitment to embed equity, civil rights, and environmental justice into all aspects of our work. At EPA, we recognize that fulfilling our mission of protecting human health and the environment depends on our ability to protect and lift up communities with environmental justice concerns that have long been overburdened by pollution. In our FY 2022-2026 Strategic Plan, we renewed our commitment to the three principles articulated at the founding of the Agency: follow the science, follow the law, and be transparent, and we added a fourth foundational principle: advance justice and equity. Including this fourth principle reflects the critical need to infuse the consistent and systematic fair, just, and impartial treatment of all people into EPA's policies, practices, and programs.

EPA continues to build upon ongoing efforts under the six priority actions outlined in our 2022 Equity Action Plan, which include addressing cumulative impacts, building the capacity of communities with environmental justice concerns to share their experience with EPA and implement community-led projects, developing EPA's internal capacity to engage communities with environmental justice concerns, strengthening EPA's external civil rights compliance program, integrating participatory science into EPA's research and program implementation, and making EPA's procurement and contracting more equitable.

With this 2023 Equity Action Plan, EPA has identified additional priorities, including addressing barriers of access to information and resources affecting rural communities, protecting children from exposure to environmental contaminants, removing barriers of access and addressing disparities affecting people with disabilities, and building our capacity to assess equity and remove barriers faced by communities with environmental justice concerns.

As outlined in this updated 2023 Equity Action Plan, EPA has made significant progress advancing equity and, particularly, on the six priorities outlined in the 2022 Plan. These efforts form a critical foundation to build meaningful engagement, achieve more equitable and just outcomes, and deliver tangible benefits to the nation's communities with environmental justice concerns. This year I was proud to establish the Office of Environmental Justice and External Civil Rights (OEJECR), a new National Program dedicated to advancing equity, which works with all of EPA's regions and other national offices to reduce barriers and disparities affecting communities with environmental justice concerns. This new Office is charged with advancing and embedding environmental justice and civil rights into the fabric and culture of the Agency.

With the 2023 Equity Action Plan, we set forth a clear and ambitious mandate to guide EPA's commitment to equity. Together, we will elevate the focus and importance of advancing equity across America – to protect the health and environment of all people regardless of race, color, national origin, income, location, gender, or disability.

## **(2) Advancing Equity Through Agency Mission**

Advancing equity, environmental justice, and civil rights<sup>1</sup> compliance is integral to EPA's mission to protect the health and the environment of all people in the United States and its territories. In its Fiscal Year (FY) 2022-2026 Strategic Plan, EPA renewed its commitment to the agency's core principles - follow the science, follow the law, and be transparent - while adding a fourth principle, advance justice, and equity. To carry out its mission, EPA is committed to developing and implementing concrete policies and activities to advance equity and environmental justice across its programs. This can only be achieved by acknowledging that many communities across the country have not sufficiently benefitted from EPA's decades of progress in reducing pollution and breaking down barriers to equity. EPA strives to infuse the consistent and systematic fair, just, and impartial treatment of all individuals into all EPA programs, policies, and activities. EPA's commitment to equity and environmental justice forms a critical foundation on which to build meaningful engagement with communities with environmental justice concerns; achieve more equitable and just outcomes, including pollution reductions in communities with environmental justice concerns; and deliver other tangible benefits. In remaining faithful to these commitments, EPA is living up to the promise to protect human health and the environment made to all people in the United States and its territories when the Agency was created more than 50 years ago.

## **(3) Executive Summary of Equity Action Plan**

Under the leadership of Administrator Michael S. Regan, EPA has deepened its dedication to making equity, environmental justice, and civil rights a centerpiece of the Agency's mission and efforts. Consistent with its [FY 2022-2026 EPA Strategic Plan, Goal 2, to "Take Decisive Action to Advance Environmental Justice and Civil Rights,"](#) and building on its [2022 Equity Action Plan](#), EPA identified key priority strategies to guide its programs, policies, and engagements in this updated and revised 2023 Equity Action Plan. Executive Order 14091 directs EPA and other federal agencies to further advance equity and embed environmental justice and external civil rights in a whole-of-government approach. Through following the science and incorporating feedback from community engagement, discussions with the National Environmental Justice Advisory Committee (NEJAC) and agency senior leaders, including the Interagency Lead on the Justice40 Initiative, EPA has identified eight priority strategies, which include four previously identified priorities carried forward from the 2022 Equity Action Plan and four newly identified strategies:

- **Priority Strategy #1: *Improve Access to Federal Funding and Assistance Programs for Communities with Environmental Justice Concerns.***

EPA will remove systemic barriers and support community capacity building to ensure that as EPA provides resources to communities of greatest need, they have the ability and readiness to receive and apply those resources to make positive change on the ground in their communities.

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<sup>1</sup>Civil Rights in this context refers to EPA's responsibility to enforce several civil rights laws which, together, prohibit discrimination on the basis of race, color, or national origin (including on the basis of limited-English proficiency); sex; disability; age; and retaliation by applicants for and recipients of federal financial assistance from EPA. (Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975, respectively.) EPA is also responsible for enforcing Section 13 of the Federal Water Pollution Control Act Amendments of 1972, which prohibits discrimination based on sex under programs or activities receiving financial assistance under the Clean Water Act.

- Priority Strategy #2: *Reduce Cumulative Environmental and Health Impacts in Communities with Environmental Justice Concerns.*<sup>2</sup>**

EPA will develop and implement a comprehensive workplan to operationalize and address cumulative impacts in EPA’s programs and activities so that no community bears a disproportionate share of adverse environmental or public health consequences.
- Priority Strategy #3: *Strengthen EPA’s External Civil Rights Compliance Program and Ensure that Civil Rights Compliance is an Agency-Wide Responsibility.***

EPA will continue to strengthen EPA’s external Civil Rights program and EPA’s ability to enforce federal civil rights laws to their fullest extent, including by fully implementing EPA’s authority to conduct investigations, compliance reviews, and other compliance and enforcement activities, issue policy guidance, and secure timely and effective resolutions to address discrimination.
- Priority Strategy #4: *Protect Children Equitably from Exposure to Environmental Contaminants.***

EPA will protect children’s environmental health, especially in communities with environmental justice concerns, by consistently and explicitly considering early life exposures to environmental contaminants and lifelong health in decisions involving human health science, risk assessment, regulations, compliance and enforcement, partnerships, communications, and research.
- Priority Strategy #5: *Address Inequitable Access to Information and Resources to Improve Engagement and Health Impacts in Rural Communities.***

EPA will provide financial and technical assistance to small and rural communities to establish and improve services to lower the risk of harm to public health and protect the environment. This strategy focuses on removing barriers to resources and providing impactful improvements for rural communities.
- Priority Strategy #6: *Ensure Public Access to EPA Programs and Activities and Ensure Full Protection from Health and Environmental Harms for People with Disabilities.***

EPA will ensure that people with disabilities have meaningful access to EPA programs, activities, and services. Further, this strategy focuses EPA resources on identifying and developing appropriate indicators within the framework of EPA’s environmental health disparity indicators to ensure full protection from health and environmental

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<sup>2</sup> EPA defines cumulative impacts as the totality of exposures to combinations of chemical and non-chemical stressors and their effects on health, well-being, and quality of life outcomes. Cumulative Impacts uses “historically marginalized communities” to further connect the legacy of racism and other structural inequities that communities with environmental justice concerns currently endure.

harms for people with disabilities.

- **Priority Strategy #7: *Strengthening Community-Based Participatory Science to Achieve Environmental Equity in Communities with Environmental Justice Concerns.***

EPA will support community engagement in participatory science to facilitate community prioritization of projects, understanding, and use of data to garner resources to solve their environmental challenges. This effort will help empower communities and inform actions to benefit their health and well-being.

- **Priority Strategy #8: *Improve Data and Analytic Capacity to Better Identify and Remove Barriers Faced by Communities with Environmental Justice Concerns.***

EPA commits to removing barriers to the availability and use of equitable data<sup>3</sup> (including limitations on the disaggregation of data) within the Agency.

These strategies are not inclusive of all the actions EPA intends to pursue in our efforts to remove barriers and improve the health and environment of the historically overburdened communities with environmental justice concerns we serve and protect, but rather support and enhance our current foundation of success and efforts to increase equitable outcomes for underserved and overburdened populations. Much of EPA's ongoing work, including for example, permitting, compliance and enforcement activities, financial and technical assistance, and cleanup actions and brownfields remediation, provides daily opportunities to address pollution burdens in historically underserved and overburdened populations. With these strategies, in conjunction with our ongoing efforts and directives, we can achieve more equitable outcomes, including a myriad of pollution reductions, water infrastructure investments, accessibility improvements, capacity building for communities with environmental justice concerns, strengthened results for rural communities and for children, and increased accessibility for people with disabilities and people with limited English proficiency.

Throughout the process of updating this 2023 Equity Action Plan, EPA sought feedback from communities and key stakeholders, including assessment of current EPA efforts and input on identified priority strategies. As directed through Executive Order 14091, EPA robustly engaged the public in communities across the country through our Federal Advisory Councils and other forms of public engagement. Feedback and input were reviewed and discussed by leadership and considered in crafting this updated 2023 Equity Action Plan.

#### **(4) Equity Progress Update and Accomplishments**

##### **A. Summary of Early Accomplishments**

EPA set forth six bold priorities in the last iteration of the Equity Action Plan. These objectives aligned with EPA's Strategic Plan and furthered EPA's progress in embedding equity into the fabric of the Agency. EPA continues to assess and identify gaps that need to be addressed to further embed equity in all programs, activities, and engagements. Even as EPA frames additional priorities to fill identified

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<sup>3</sup>Equitable data are those that allow for rigorous assessment of the extent to which government programs and policies yield consistently fair, just, and impartial treatment of all individuals. Equitable data illuminate opportunities for targeted actions that will result in demonstrably improved outcomes for communities with environmental justice concerns.

equity gaps, the Agency remains steadfast in support of current forward-looking equity priorities. Below are highlights of EPA's accomplishments within the previous six identified 2022 Equity Action Plan priorities.

### ***Priority Action #1: Developing and Operationalizing a Cumulative Impacts Framework in EPA's Programs and Activities.***

- Issued [Cumulative Impacts: Recommendations for ORD Research](#), which provides recommendations for EPA's cumulative impacts research to improve scientific methods and tools.
- Issued [Legal Tools to Advance Environmental Justice: Cumulative Impacts Addendum](#), an assessment of EPA's legal authorities to consider and address cumulative impacts.
- Released draft [Guidelines for Cumulative Risk Assessment Planning and Problem Formulation](#). These Guidelines provide technical description of broad engagement in problem formulation and conditions for inclusion of multiple stressors in cumulative assessments.
- [Awarded \\$21.4M in research grant funding](#) to 16 institutions for community-based research on how climate change may compound adverse environmental conditions and health stressors in communities with environmental justice concerns.
- Developing Agency-wide Cumulative Impacts Framework to inform efforts to operationalize and integrate cumulative impacts analysis and action in EPA's programs.
- Launched Agency-wide workgroup to establish best practices to integrate susceptibility and vulnerability information into human health risk assessments and produce a state-of-the-science report.
- Launched cumulative impacts assessments to address long-standing environmental issues in rural and urban locations, which has resulted in eight place-based demonstration efforts across the country.
- Conducted workshops on cumulative impacts with Chicago Department of Public Health, Minnesota Pollution Control Agency, and New Jersey Department of Environmental Protection.
- Incorporated community, Tribal, and academic input to cumulative impacts strategy through engagement with National Environmental Justice Advisory Council, Local Government Advisory Committee and Science Advisory Board on cumulative impacts.
- Initiated Agency-wide cumulative impacts webinar series and office hours, which involved nearly 20 sessions and has brought together approximately 3,000 total participants from all programs and regions.
- [Issued STAR grant awards](#) for *Centers for Early Lifestage Vulnerabilities to Environmental Stressors – Cumulative Health Impacts* to fund research investigating cumulative health impacts for children in rural agricultural communities with environmental justice concerns.

### ***Priority Action #2: Building the Capacity of Communities with Environmental Justice Concerns.***

- In FY 2023 established an [Environmental Justice Thriving Community Technical Assistance Center \(EJ TCTAC\)](#) program with thirteen regional technical assistance centers across the country in addition to three nation-wide centers providing capacity-constrained communities and other environmental justice stakeholders – free of charge and without the need for any application – technical assistance on basic capacity needs such as grant proposal writing, grant management, effective implementation of projects and grant resources, reporting, etc. While the EJ TCTAC network stands up in early FY 2024, it is anticipated that the services will reach tens of thousands of communities across the United States over the next five years. The EJ TCTACS are

one of twelve technical assistance programs offered by EPA as noted in the [Investing in America Technical Assistance Guide](#).

- The EJ TCTACs also supports the federal Thriving Communities Network and provide an initial access point and proactive support for communities and their partners to identify and access additional more specialized forms of support across government and private philanthropic resources.
- Designed and competed the [Environmental Justice Thriving Communities Grantmaking Program](#) (EJ TCG). The EJ TCG program is establishing a national network of Grantmakers that will make subgrants to communities in their regional coverage areas in amounts between \$100-350K. These subawards through the Grantmakers will achieve two equity goals – greatly reducing the burden capacity-constrained communities face when seeking such amounts of funding directly from the federal government through a full federal competition and assistance agreement, and also increasing the turn-around time in actually receiving an award from a Grantmaker as opposed to the federal government. EPA plans to award at least eleven (11) Grantmaker awards across the United States with \$50M, each of which must in turn directly award at least \$40M to capacity-constrained communities. EPA anticipates that over the next three years the Grantmakers will make approximately 2,000 subawards in the amounts cited. EPA has [announced the eleven \(11\) recipients of the EJ TCGM awards totaling \\$600M](#).
- [Announced \\$128M](#) for Environmental Justice Projects across the Country through the Thriving Communities EJ Collaborative Problem Solving and Government to Government Grant programs launched in FY 2023 which support communities, and their governmental partners establish strong collaborative efforts to identify solutions to priority equity and justice challenges facing the community.

### ***Priority Action #3: Developing EPA’s Internal Capacity to Engage Communities with Environmental Justice Concerns.***

- Launched new [Office of Environmental Justice and External Civil Rights](#) (OEJECR).
- Significantly increased OEJECR staffing support with a majority of full-time employees deployed in EPA’s 10 regions to advance environmental justice and integrate equity in the implementation of Agency programs and to collaborate with governmental partners on the ground in support of community environmental justice and civil rights priorities.
- Strengthened and increased contract support for language assistance services throughout EPA in addition to community engagement support for regional EJ staff.
- Developed Agency-wide implementation plans for achieving Goal 2 of Strategic Plan, *Take Decisive Action to Advance Environmental Justice and Civil Rights*.
- Launched effort to develop a set of indicators to identify disparities in environmental and public health conditions.
- Engaged in training and capacity building activities across EPA programs and regions on the fundamentals of integrating equity and justice into the agency’s mission delivery by expanding the knowledge base of EPA staff.

### ***Priority Action #4: Strengthening External Civil Rights Enforcement.***

- Initiated EPA’s first compliance review to evaluate impacts of potentially discriminatory activities by EPA financial assistance recipients in communities with environmental justice concerns.



- Revised EPA’s pre-award compliance review process for applicants and recipients requesting EPA financial assistance to ensure that all recipients of EPA funding are in compliance with procedural requirements and entered into approximately 90 agreements with recipients to come into compliance with obligations under EPA’s nondiscrimination regulation.
- In August 2022, EPA issued “[Interim Environmental Justice and Civil Rights in Permitting FAQs](#),” which gathered existing guidance, technical assistance, and other resources to assist permit writers and reviewers with integrating environmental justice and civil rights into decision-making.
- Completed jurisdictional review of 47 complaints, accepted 10 of those cases, and to date, have resolved 5, as compared to FY 2020 of only 15 cases accepted.
- Conducted multiple national public engagement technical assistance sessions, with a future public commitment to hold at least one per quarter to provide transparency of civil rights work and an opportunity for public input.
- Increased transparency by affirmatively providing information to the public including an interactive [Online Docket](#) of all external civil rights complaints filed with EPA since 2014, and corresponding documents.
- Provided civil rights compliance technical assistance and training to hundreds of EPA financial assistance recipients and other stakeholders both one-on-one and through workshops to encourage compliance.

#### ***Priority Action #5: Integrating Participatory (Community) Science.***

- Released [Using Participatory Science at EPA: Vision and Principles](#), a strategic approach to using participatory science to strengthen environmental protection.
- Produced [resource materials](#) for quality assurance to support the use of participatory science as an asset.
- Produced [Participatory Science Policy Guidelines and Checklist](#) to build internal EPA capacity to design, fund, and manage participatory science projects.
- Established the [Community-Engaged Research Collaborative for Learning and Excellence](#) (CERCLE) as a center for place-based, co-produced research.
- [Announced](#) \$53M in funding for 132 air monitoring projects in 37 states that will enhance air quality monitoring in communities across the U.S.
- EPA’s Ports Initiative partnered with EPA’s Environmental Justice Small Grant Program [to award seven ~\\$75K grants](#) to help communities to engage in collaborative efforts to reduce diesel pollution at ports and railyards.

#### ***Priority Action #6: Ensure EPA Procurement and Contracting is Equitable.***

- Implemented four policy initiatives to increase small business utilization and reduce the burden of proposal submission by socially disadvantaged and minority serving institutions.
- Oral Presentation Implementation underway to expedite the evaluation process by allowing small business teams to showcase their technical expertise and engage with Government evaluators.
- Conducted Agency outreach to provide socially and economically disadvantaged small businesses and minority-serving institutions the opportunity to learn more about EPA’s operations and mission from EPA decision-makers at conferences, industry days, public outreach events, and listening sessions while simultaneously broadening Agency awareness of capabilities of these businesses and minority-serving institutions. The outreach events reached 8,238 small businesses.

- Led process of integrating EPA organizational culture change efforts that enhance vendor diversification, procurement equity, and inclusion. A webinar was hosted during Small Business Week to amplify the use of small and socioeconomic businesses. Over 1,000 EPA personnel attended this webinar.
- Developed EPA training curriculum for small businesses, comprised of nine topics that will be offered in FY 2024.

## **B. Environmental Justice Scorecard**

In April 2023, the Office of Management and Budget, the Council on Environmental Quality (CEQ), and the U.S. Digital Service published [Phase One of the Environmental Justice Scorecard](#) (EJ Scorecard), the first government-wide assessment of federal agencies' efforts to advance environmental justice. The EJ Scorecard for EPA is a snapshot that provides transparency and accountability as the Agency continues to advance equity and justice efforts, over time, as a central focus for EPA's mission. This Phase One Scorecard focused on the following three areas:

- [Justice40 Initiative](#) (Justice40), to work towards the goal that 40% of the overall benefits of certain federal investments flow to disadvantaged communities.
- Environmental and Civil Rights Protection.
- EPA's efforts to institutionalize environmental justice.

High level highlights of EPA's EJ Scorecard include 28 open Title VI investigation(s) or compliance review(s), the unprecedented inclusion of the goal to advance environmental justice and civil rights compliance in EPA's FY 2022-2026 Strategic Plan, and approximately [70 programs](#) covered under Justice40, including the following six EPA Justice40 pilot programs:

- Drinking Water State Revolving Fund
- Clean Water State Revolving Fund
- Reducing Lead in Drinking Water
- Brownfields
- Superfund
- Diesel Emissions Reductions Act Program (DERA)

This Phase One Scorecard is not comprehensive of all of EPA's efforts but introduces the Agency's ongoing work and commitment to advance equity and justice. Please visit this link to read more about EPA's efforts to advance equity and justice in the [EJ Scorecard for EPA](#).

## **C. Additional Efforts to Advance Equity**

- Committed in EPA's Strategic Plan to increase inspections at facilities that affect communities with potential environmental justice concerns from a baseline of 27% to 45% in FY 2022, 50% in FYs 2023-2024, and 55% in FYs 2025-2026; in FY 2022, EPA exceeded the target and conducted 56% of its inspections in communities with environmental justice concerns.
- As a follow-up to the Administrator's Journey to Justice tour, deployed a multi-scale monitoring project ("Pollution Accountability Team") in overburdened Louisiana communities; also developing enforcement actions where excess emissions are identified by these monitoring efforts and unannounced inspections.
- Since FY 2021, issued over 133 orders to address drinking water violations in communities, particularly in communities with environmental justice concerns, such as Cahokia Heights, Illinois, Clarksburg, West Virginia and Jackson, Mississippi and in Tribal areas.

- In March 2022, reached a settlement with Chevron Phillips Chemical Company to install and operate air pollution controls at three petrochemical manufacturing facilities in Texas located in areas of environmental justice concern; monitoring results will be publicly posted, and corrective actions are required if emissions exceed certain thresholds.
- Took aggressive, early enforcement actions in communities with environmental justice concerns:
  - In August 2022, following negotiations that considered concerns voiced by the local community, secured a preliminary injunction for the Toa Alta Municipal Solid Waste Landfill to take immediate action to address urgent human health and environmental concerns.
  - Issued two Clean Air Act emergency orders to shut down the Limetree Refinery in the U.S. Virgin Islands (June 2021) where residents were sickened by excess sulfur and hydrogen sulfide emissions and to cut hydrogen sulfide emissions from the New Indy plant in South Carolina (May 2021).
- Provided more enforcement information to communities about facilities, pollution, and enforcement activities through press releases, desk statements, public meetings, and websites focused on specific communities and incidents (e.g., [Refinery on St. Croix, U.S. Virgin Islands](#), [H2S in South and North Carolina](#), [Toa Alta Landfill in Puerto Rico](#)).
- Increased efforts to obtain input from communities on potential remedies prior to finalizing settlement agreements.
- Developed analytical approaches to address environmental justice implications of major regulatory proposals and final rules. For example,
  - For the [Oil and Natural Gas New Source Performance Standard proposal](#) (November 2021) and [the Supplemental Proposal](#) (November 2022), EPA held virtual trainings (900+ participants) marketed to communities with environmental justice concerns and Tribes to assist their ability to understand and comment meaningfully on the proposal.
    - EPA’s proposal included requirements for states to undertake meaningful outreach and engagement with communities with environmental justice concerns as they develop their plans for regulating existing oil and gas sources under the emissions guidelines.
- In the final nitrogen oxides (NOx) emission standards for trucks, conducted analyses of the number and demographics of the populations living within close proximity to truck freight routes. This [final rule](#) will likely result in widespread air quality improvements across the U.S., especially in areas already overburdened by air pollution and diesel emissions, beginning with model year 2027.
- In July 2023, issued proposed rules to strengthen lead paint standards to protect against childhood lead exposure.
- Developed a [Strategy to Reduce Lead Exposures and Disparities in US Communities](#) to advance EPA’s work to protect the public from lead with an emphasis on high-risk communities.
- Announced the allotment of \$2.865B FY 2023 funds from the Drinking Water State Revolving Fund for identification and replacement of lead service lines (LSLs). As part of the Lead Service Line Replacement (LSLR) Accelerators, EPA and 4 state partners are working with 40 communities to address existing barriers and accelerate progress towards LSL identification and replacement. The new Accelerator provides targeted technical assistance services to help communities with environmental justice concerns access funds from President Biden’s Bipartisan Infrastructure Law<sup>4</sup> and this initiative will prioritize benefits to communities with EJ concerns and promote equity.
- Provided Spanish Lead Awareness Curriculum for Indian Country.

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<sup>4</sup>See, e.g., [EPA Launches New Initiative to Accelerate Lead Pipe Replacement to Protect Underserved Communities](#).

- Proposed stronger requirements<sup>5</sup> for the removal of lead-based paint hazards in pre-1978 buildings and child-care facilities to better protect children and communities from harmful effects of exposure to dust generated from lead paint.
- Released outreach and educational materials in various languages highlighting the risks of heavy metal exposures primarily to children and pregnant women in products such as spices, cosmetics and cookware.
- Announced a series of free educational sessions<sup>6</sup> on the dangers of lead and ways to reduce and prevent lead exposure in children and across U.S. communities.
- Published the [Renovate Lead-Safe Media Kit](#) to educate about the availability of lead-safe certified contractors and the importance of following do-it-yourself lead-safe work practices in removing lead-based paint.
- Released an [environmental justice toolkit](#) for lead paint enforcement programs that provides strategies, examples, and other information for federal, state, Tribal and local government enforcement practitioners to use during all stages of environmental enforcement and compliance monitoring activities designed to eliminate harmful exposures to lead paint in housing.
- Issued [principles](#) for addressing environmental justice concerns in air permitting and conducted outreach to state and Tribal partners.
- In the [New Source Performance Standards \(NSPS\)](#) and [Emissions Guidelines for Greenhouse Gas Emissions from Electric Generating Units \(EGUs\)](#), conducted pre-proposal outreach to environmental justice organizations and representatives of communities affected by pollution from the power sector.
- Awarded \$900M in funding for [Clean School Buses](#) to support replacement of existing school buses with zero-emission or low-emission buses that reduce exhaust, which is linked to asthma.
- In June 2023, conducted a public webinar on ways to make bilingual pesticide labeling accessible to farmworkers and conducted outreach and solicited feedback from stakeholders, including the National Environmental Justice Advisory Council, farmworker advocacy groups, and the Pesticide Program Dialogue Committee.
- Promoted best burn practices and cleaner technologies. Assisted partners with wood heater changeout programs to meet requirements of New Source Performance Standards (NSPS) for Residential Wood Heaters, which helps to protect low-income families and communities who rely on wood heaters from wood smoke.
- Awarded \$2M among 10 winners for the [Cool Communities Challenge](#). Hosted a national webinar to share innovative and effective communication strategies that inform people of the risks of extreme heat, providing materials in 13 languages and offering ways to keep safe during the hottest days to better reach communities with environmental justice concerns in inner cities and farmworkers, among others.
- Hosted a prize competition to protect public health, including maternal health, through the Let's Talk About Heat Challenge, focused on innovative communication strategies to warn people of the risks of extreme heat and provide solutions on how to keep safe during the hottest days. Among the winners were messages targeted to people known to be more susceptible to extreme heat, which includes those who are pregnant and children.

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<sup>5</sup>See, e.g., [Biden-Harris Administration Proposes to Strengthen Lead Paint Standards to Protect Against Childhood Lead Exposure | US EPA.](#)

<sup>6</sup>See, e.g., [EPA Launches Nationwide Series of Community Lead Awareness Sessions | US EPA.](#)

#### D. Advancing Equity Through Key Legislation:

The Bipartisan Infrastructure Law (BIL) and Inflation Reduction Act (IRA) provide needed resources to address burdens that, for too long, have plagued communities with environmental justice concerns across our country, including bearing the brunt of toxic pollution, enduring underinvestment in infrastructure and critical services, and suffering disproportionate impacts from climate change. In just one year, EPA has made tremendous progress in removing barriers affecting our most impacted communities with environmental justice concerns.

Through the historic investment of the [Bipartisan Infrastructure Law](#), EPA is delivering more than \$50 billion to improve our nation's drinking water, wastewater, and stormwater infrastructure to cities, towns, and territories across the country, many of which are in disadvantaged communities. For example, EPA awarded \$4 billion to states, Tribes, territories, and the District of Columbia in capitalization grants under the 5 Bipartisan Infrastructure Law funded State Revolving Fund (SRF) programs. These programs provide low-cost financing for a wide range of water infrastructure projects from sewage systems to drinking water with nearly half of the funding flowing to disadvantaged communities.<sup>7</sup> Additionally, EPA created a \$5 billion non-competitive grant program for small or disadvantaged communities to address emerging contaminants, including per- and polyfluoroalkyl substances (PFAS), in drinking water systems.<sup>8</sup>

With the first wave of funding announced in December 2021, EPA deployed more than \$1 billion from BIL for cleanup activities at more than 100 Superfund National Priorities List sites across the country. EPA started 81 new cleanup projects in 2022, including projects at 44 sites previously on the backlog. By starting four times as many construction projects as the year before, EPA is aggressively bringing more sites across the country closer to finishing cleanup. In February 2023, EPA announced the second wave of approximately \$1 billion in funding from the Bipartisan Infrastructure Law to start new cleanup projects at 22 Superfund sites and expedite other ongoing cleanups across the country.

Through these and other efforts, EPA is working to reach communities with environmental justice concerns throughout the Nation and advance equity and environmental justice. For a deeper dive into, and additional highlights of, EPA's momentous accomplishments for communities across the country through the Bipartisan Infrastructure Law, please [visit the Bipartisan Infrastructure Law](#) page and EPA's "Year One Anniversary Report".

Through the IRA, EPA is investing directly to reduce pollution in frontline communities. This includes, for example, [Environmental and Climate Justice Grants](#) to support community-led projects in communities with environmental justice concerns, funding for fenceline monitoring near industrial facilities, and spurring solar development in low-income communities through the [Solar for All Grant program](#). Read [highlights of the one-year anniversary](#) of this ambitious legislation and EPA's implementation of programs providing support to communities that unjustly bear the burdens of environmental harm and pollution.

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<sup>7</sup> There are five State Revolving Fund (SRF) BIL programs: Clean Water SRF, Drinking Water SRF, Clean Water SRF emerging contaminants, Drinking Water SRF emerging contaminants, and lead service line replacement.

<sup>8</sup> The Infrastructure Investment and Jobs Act (IIJA) of 2021 (P.L. 117-58) expanded provisions under SDWA 1459A, making \$5 billion in grant funding available through EPA's [Emerging Contaminants in Small or Disadvantaged Communities \(EC-SDC\) Grant Program](#).

## EPA's 2023 Equity Action Plan

In support of EPA's mission to protect human health and the environment and adhere to the core value to advance justice and equity, EPA has identified eight key priority strategies to guide programs, policies, and activities. These strategies create a framework to advance and embed environmental justice and external civil rights into the fabric of the Agency.

### Key Priority Strategies to Advance Equity

- ✓ Improve access to federal funding and assistance programs for communities with environmental justice concerns.
- ✓ Reduce cumulative environmental and health impacts in communities with environmental justice concerns.
- ✓ Strengthen EPA's external civil rights compliance program and ensure that civil rights compliance is an Agency-wide responsibility.
- ✓ Protect children equitably from exposure to environmental contaminants. (new)
- ✓ Address inequitable access to information and resources to improve engagement and health impacts in rural communities. (new)
- ✓ Ensure public access to EPA programs and activities and ensure full protection from health and environmental harms for people with disabilities. (new)
- ✓ Strengthening community-based participatory science to achieve environmental equity in communities with environmental justice concerns.
- ✓ Improve data and analytic capacity to better identify and remove barriers faced by communities with environmental justice concerns. (new)

### **Strategy #1: Improve Access to Federal Funding and Assistance Programs for Communities with Environmental Justice Concerns.**

EPA continues to prioritize removing barriers faced by communities with environmental justice concerns accessing technical assistance and resources. Our belief as stated in our FY 2022 Equity Action Plan remains true today: communities with environmental justice concerns and other overburdened communities are often deeply affected by environmental policymaking. Yet these communities with environmental justice concerns can face multiple resource and capacity challenges to engaging with EPA or accessing its programs and resources. These communities often have experienced decades of chronic underinvestment and frequently lack capacity to engage in decision-making processes, prepare competitive proposals, or manage federal awards. EPA and other federal partners may fail to coordinate funding and assistance programs, thereby transferring the burden of identifying and coordinating complementary programs onto the already capacity-constrained community. These barriers most affect communities that are smaller; have faced decades of disinvestment and overburden; are economically or otherwise disadvantaged; have limited English proficiency or populations with disabilities that prevent full access to meetings and information; and/or lack access to digital infrastructure.

#### **Whole-of-Government Equity Objective(s):**

- **Environmental Justice**

- **Economic Justice**

**Collaborating Agencies:** Department of Energy (DOE)

**Barriers to Equity:**

Communities with environmental justice concerns face capacity constraints in accessing federal assistance such as grants and technical assistance. These barriers impede efforts to identify the appropriate and most needed forms of assistance, write compelling grant applications, form multiparty collaborative partnerships, develop holistic plans with multiple project elements, and effectively implement and report on the results of grants received.

**Evidence Base to Support Strategy:**

- EPA’s ongoing engagement with communities in multiple forums provides information on challenges faced by communities navigating opportunities. These include engagement through:
  - Environmental Justice Grants and Technical Assistance programs;
  - the National Environmental Justice Advisory Council (NEJAC); and
  - additional existing channels such as monthly National EJ Community Engagement calls.
- The Government Accounting Office (GAO) has found communities with environmental justice concerns, in particular those in rural areas, Tribal lands, and financially disadvantaged, face challenges in accessing federal grant opportunities, navigating federal systems and managing federal grant funds.<sup>9</sup>

**Actions to Achieve Equity:**

To address identified barriers and to ensure equitable access to federal funding and assistance programs, as well as meaningful participation for communities with environmental justice concerns, EPA will:

- Operationalize a National Network of EJ Thriving Community Technical Assistance Centers (EJ TCTACs). The EJ TCTACs will be the backbone of EPA’s comprehensive community support efforts. The TCTACs will provide ground floor front door accessibility to thousands of capacity constrained communities across the United States free of charge and with no application to receive help. The EJ TCTACs will focus on basic capacity building assistance such as organizational development, engagement and collaboration building between communities and others such as local utilities and states, grant-writing training, and support.
- Operationalize EJ TCTACs as a one-stop shop to support communities, that will also serve as a navigator for capacity constrained communities to identify and receive additional forms of support from across government and other sources that match their needs. Traditionally the government has squarely placed the burden on communities of looking across thousands of different assistance programs (grants, assistance, other forms of support) and understanding which programs are available to meet their needs. The EJ TCTACs will be a single point of entry for capacity constrained communities into this broader constellation of assistance and will not just inform communities of different programs but facilitate access to the support that matches the needs of communities.
- Establish and operationalize a [National Network of EJ Thriving Community Grantmakers](#) (EJ TCGM). The EJ TCGM program will build a nation-wide network of Grantmakers that will provide

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<sup>9</sup> See, e.g., [Communities Rely on Federal Grants, But May Have Challenges Accessing Them](#).

subgrants to communities in their regional coverage areas in amounts between \$100-350K. These subgrants will essentially replace EPA's traditional grant programs such as the EJ Small Grants, which would provide such small levels of support directly to communities through a traditional government grant competition and award process. The subawards through the Grantmakers will achieve two equity goals – greatly reducing the burden capacity-constrained communities face when seeking small amounts of funding directly from the federal government, and also increasing the speed with which communities receive an award. EPA plans to make at least eleven (11) Grantmaker awards across the United States with \$50M each, of which at least \$40M must be directly subawarded to capacity-constrained communities. EPA anticipates that over the next three years the Grantmakers will make approximately 2,000 subawards in the amounts cited. [EPA has announced the eleven \(11\) recipients](#) of the EJ TCGM awards totaling \$600M.

- Launched a new \$2B [Environment and Climate Justice Community Change Grant](#) program with a focus on re-envisioning the application process to ensure equity. In FY 2024, EPA will compete these new Community Change Grants, which will be the vehicle through which approximately \$2B in IRA funding will flow. Community Change Grants will focus on awarding between \$10-20M to multi-faceted proposals from community-driven collaborations that bring together efforts to deal with legacy pollution, the impacts of climate change, development of local workforces, meaningful engagement, community education – all with a goal of implementing solutions that create positive change on the ground for communities. EPA is implementing several innovative solutions to increase equity through this program.
  - While the EJ TCTACs will focus on providing more basic forms of support to capacity-constrained communities, they will also facilitate communities with higher levels of capacity to access more specialized forms of technical assistance provided by contractors. This contractor-provided technical assistance will offer communities the support they need for planning, project development, financing, etc. in the development of multi-faceted proposals for the Community Change Grant program. Technical assistance by the contractor will also support proposals that receive support to ensure high quality reporting, tracking, and telling the story of how the Community Change Grants catalyzed positive and meaningful change on the ground for the recipient communities.
  - The Community Change Grant program will have a two-stage application process. The first stage will be a more traditional written application that is streamlined to the extent feasible to ease the burden on applicants. Proposals that meet minimum criteria in the paper application will then be invited to an oral presentation that will achieve two goals – minimize the role that professional grant writers play for typically better-resourced communities and allow EPA grants staff to engage directly with community leaders and their partners to investigate the authenticity of the project's community-driven nature and the sustainability ensured by different partners of the project.
  - In addition – to ease the burden on communities – the Community Change Grant will have a 12-month open application period. This will achieve several equity goals. It will provide communities significantly more time to build the partnerships and multi-faceted proposals sought through this competition. It will allow EPA program staff the opportunity to tailor the competition over the year-long window based upon feedback from prospective applicants and the actual proposals received to ensure that the competition fits the needs and purpose as closely as possible. The rolling application will



also allow proposals that do not score sufficiently high enough to have the opportunity to receive a debrief from the competition scoring panel and then resubmit a revised proposal. This final element will help communities increase their capacity and eliminate the sunk costs of competitions that only provide a single bite at the apple.

**Proposed Metrics:**

EPA will track changes in the following indicators:

**Near- to Medium-Term:**

- Number of communities that receive fundamental capacity building assistance through the EJ TCTACs.
- Number of new grantees and resources flowing to disadvantaged communities through EPA Justice40 programs.
- Number of successfully completed project elements vs. number of projects unsuccessfully completed resulting in funding returned to EPA.
- Number of new community-driven partnerships working collaboratively to implement change-making projects on the ground in communities.<sup>10</sup>

**Longer-Term:**

- Change in conditions on the ground for communities such as:
  - reduction in heat islands and other negative impacts of climate change.
  - reductions in the impact of legacy pollution on communities.
  - increase in community capacity and ability to develop and deliver multifaceted projects through multiple funding/resource streams that implement solutions on the ground for communities.
  - increase in workforce development in communities with environmental justice concerns that drives communities' resilience, wealth creation, and retention within the community.
  - increase in meaningful engagement structures and systems collaboratively developed by communities and their local, Tribal, state, and federal government partners.

**Public Participation and Community Engagement for EPA has and will include:**

- Ongoing monthly National EJ Community Engagement calls.
- Ongoing public engagement calls open to all communities to provide educational outreach and assistance regarding federal assistance programs through the Office of Environmental Justice and External Civil Rights.
- Ongoing in-person presentations to the National Environmental Justice Advisory Committee and the White House Environmental Justice Advisory Committee.
- Upcoming assistance calls at the national level regarding the Environment and Climate Justice Community Change Grant competition.
- Ongoing outreach engagement by the TCTACs and other contractor-led technical assistance providers, and regional staff that will provide feedback to EPA on efforts to improve access for communities with environmental justice concerns.
- Continuous feedback of ongoing activities through increased staffing capacity across all ten EPA regions that expands outreach and engagement efforts of regional staff with communities in their regions.

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<sup>10</sup> EPA is in the process of developing an effective evaluation framework to capture this information.

## Strategy #2: Reduce Cumulative Environmental and Health Impacts in Communities with Environmental Justice Concerns.

No community should bear a disproportionate share of adverse environmental or public health consequences from the nation’s economic and other activities. Pursuant to Executive Order 14096, historically marginalized communities overburdened by the cumulative impacts<sup>11</sup> of environmental and social stressors should be afforded the full protection of government agencies and programs. This will be accomplished by leveraging coordination and collaboration in addressing cumulative impacts, with whole-of-government approaches involving multiple programs and agencies. Such efforts will be supported by “fit-for-purpose” analytic methods and data appropriate for the decision context involved (e.g., allocation of resources, permitting, enforcement, rulemaking, and standard-setting), consistent with statutory authorities. Government decision-making should address the historical drivers of the inequitable concentration of environmental burden, such as redlining and urban renewal, as well as the inequitable impacts of climate change. These driving principles are at the core of EPA’s approach to addressing cumulative impacts in underserved, overburdened and historically marginalized communities with environmental justice concerns, and establishing a pathway to health, equity, sustainability, and resilience.

### Whole-of-Government Equity Objectives:

- **Environmental Justice**
- **Health Equity**
- **Economic Justice**
- **Housing Justice and Community Investment**

### Barriers to Equity:

- Fragmentation now systematically structured into government programs, particularly those of US EPA and its co-regulators. There is insufficient coordination and collaboration across EPA’s programs, its co-regulators, and its governmental partners.
- Need to expand the toolkit of methods for analyzing cumulative impacts to include assessment of disproportionate impacts, health disparities, and social determinants of health.
- Failure of environmental decision-making to incorporate and address historical and structural factors such as redlining, where there is a demonstrated link to negative environmental quality.
- Failure of government programs to fully appreciate how housing, health care access, transportation, economic development, green space access, climate change, and other issues result in inequitable distribution of cumulative environmental and public health hazard and harm.
- The need for funding and human resources given that cumulative impact assessment requires engagement with communities and other stakeholders.

### Evidence Base to Support Strategy:

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<sup>11</sup> EPA defines cumulative impacts as the totality of exposures to combinations of chemical and non-chemical stressors and their effects on health, well-being, and quality of life outcomes. Cumulative Impacts uses “historically marginalized communities” to further connect the legacy of racism and other structural inequities that communities with environmental justice concerns currently endure.

- Growing body of empirical studies that quantitatively demonstrate the inequitable distribution of environmental and other hazards and harms in multiple societal sectors and their relationship to social vulnerability, the legacy of racism, and health outcomes.<sup>12</sup>
- Narratives and qualitative information from communities overburdened with environmental hazards and harms, as well as lack of services and protections in other societal sectors.<sup>13</sup>
- A growing body of work by EPA's programs and regions on cumulative impacts in terms of science research, methods and tools development and application, community-based demonstration projects, and exploration of innovative concepts and practice. This includes 94 research projects under EPA Office of Research and Development's Strategic Research Action Plans, development of new analytic tools to quantify cumulative impacts such as matrices, and application of comprehensive community action plans.

#### **Actions to Achieve Equity:**

- Build internal capacity by developing policies, procedures, and practices to improve coordination, collaboration, and adoption of cumulative impacts approaches across programs. A formal workgroup will promote continuous learning opportunities across EPA programs and their governmental partners by identifying and facilitating development and use of promising practices and ensure accountability by tracking activities across EPA.
- Create forums to explore emerging tools and methodologies, innovative ideas, and promising practices. The workgroup will use multiple venues, such as focus groups, webinars, and workshops, to advance understanding of topics related to cumulative impacts. These include but are not limited to quantitative and qualitative methods, community engagement, community participatory science, disproportionate burden, historical drivers, intersectional issues, significant projects, and emerging practice.
- Develop a logic model for operationalizing and integrating efforts to assess and address cumulative impacts in EPA's programs.
- Increase internal capacity by building a network of practitioners in EPA's programs and regions to support cumulative impact assessment actions and share data, information resources, best practices, and legal tools.
- Promote capacity building by developing and delivering training materials on cumulative and disproportionate impacts; identify opportunities for delivering training and sharing resources.
- Advance the development and implementation of performance metrics on assessing and addressing cumulative impacts in EPA's Strategic Plan Goal 2 Annual Performance Goals.
- New recommendations regarding outcome metrics to demonstrate progress on operationalizing and integrating cumulative impacts in EPA's programs.

#### **Proposed Metrics:**

EPA will track changes in the following indicators:

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<sup>12</sup> See, e.g., [Toxic Wastes and Race in the United States: A National Report on the Racial and Socio-Economic Characteristics of Communities with Hazardous Waste Sites](#); see also, e.g., [Dumping in Dixie: Race, Class, and Environmental Quality](#); see also, e.g., [Separate and unequal: residential segregation and estimated cancer risks associated with ambient air toxics in U.S. metropolitan areas](#); see also, e.g., [The Relationship of Historical Redlining and Present-Day Neighborhood Environmental and Health Outcomes: A Scoping Review and Conceptual Model](#).

<sup>13</sup> Community testimony at meetings of the National Environmental Justice Advisory Council since its inception in 1993 has spoken to the cumulative impacts issue.

#### Near to Medium-Term:

- Increase in the number of cumulative impacts assessments or actions initiated, in progress, and/or completed.
- Increase in the number of activities to: (1) facilitate discourse on emerging approaches and tools, innovative ideas, and promising practices; (2) develop and apply methods and tools; (3) implement research projects; (4) build expertise, consensus, and capacity; (5) develop and implement demonstration projects; and (6) improve cross-program, cross-agency and multi-stakeholder collaboration and coordination.

#### Longer-Term:

- Reduction in cumulative impacts and measurable health disparities in vulnerable and overburdened communities.

#### **Public Participation and Community Engagement EPA has conducted and will include:**

- Systematic engagement with EPA advisory bodies, including the Science Advisory Board, Science Advisory Committee for Chemicals, National Environmental Justice Advisory Council, Local Government Advisory Committee, Board of Scientific Counselors, Farm, Ranch and Rural Communities Committee, and the Pesticide Program Dialogue Committee.
- Continuing engagement with overburdened communities with environmental justice concerns while implementing place-based projects, methods and tools development, and development of policies and regulations.
- Regular engagement with overburdened communities, governmental partners, stakeholders, and researchers through a variety of forums, including webinars, focus groups and symposiums.

### **Strategy #3: Strengthen EPA’s External Civil Rights Compliance Program and Ensure that Civil Rights Compliance is an Agency-Wide Responsibility.**

An effective civil rights compliance program creates accountability to ensure that the actions, policies, and practices of recipients of federal financial assistance comply with civil rights requirements.

#### **Whole-of-Government Equity Objective(s):**

- **Civil Rights**

#### **Barriers to Equity:**

- Historically, civil rights enforcement in the environmental sector has been insufficiently resourced, and resource constraints have hindered EPA’s ability to fully use its civil rights implementation and enforcement authority to vigorously enforce federal civil rights laws.
- EPA’s civil rights compliance efforts have not fully engaged with internal and external stakeholders and had not fully integrated civil rights compliance throughout EPA programs and activities.

#### **Evidence Base to Support Strategy:**

- Research literature associating greater exposure to pollution and adverse health outcomes with race and national origin, as well as with historic discriminatory practices such as redlining.<sup>14</sup>
- Input from ongoing engagement with stakeholders including the National Environmental Justice Advisory Council and quarterly through National EJ Community Engagement calls.

#### **Actions to Achieve Equity:**

To address the identified barriers and to ensure equitable, meaningful, and improved health for communities with environmental justice concerns through civil rights compliance efforts, EPA will:

- Strengthen its external civil rights workforce through hiring, onboarding, and training of dedicated civil rights staff, both in headquarters and the regions, and retaining the services of contract staff to support the civil rights mission, and the various underlying initiatives outlined below.
- Initiate and complete proactive pre-award and post-award civil rights compliance activities, including affirmative compliance reviews.
- Operationalize clear and strong civil rights guidance and provide corresponding training and technical assistance to increase recipients’ compliance with civil rights laws.
- Conduct timely and effective civil rights complaint investigations and resolutions, even as we work to address a record number of new incoming complaints, and simultaneously meet deadlines.
- Strengthen federal interagency collaboration and coordination on complaints, compliance reviews, and policy guidance.
- Increase transparency, enhance engagement with environmentally overburdened communities, and engage all EPA program and regional offices in civil rights compliance activities.

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<sup>14</sup> See, e.g., [2022 Historical Redlining Is Associated with Present-Day Air Pollution Disparities in U.S. Cities](#); see also, e.g., [Disparities in Air Pollution Exposure in the United States by Race/Ethnicity and Income, 1990-2010](#); see also, e.g., [Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts](#); see also, e.g., [Disparities in Distribution of Particulate Matter Emission Sources by Race and Poverty Status](#).

- Partner with the EPA Conflict Prevention and Resolution Center to refine the informal resolution process to increase opportunities for complainants and communities to participate in resolving complaints.

**Proposed Metrics:**

Near- to Medium-Term:

EPA will hold itself accountable through its direct alignment with Agency-wide long-term and annual performance goals and objectives in Goal 2 of EPA’s FY 2022-2026 Strategic Plan. In addition, EPA made several commitments to the Office of the Inspector General in response to its audit titled [\*Improved EPA Oversight of Funding Recipients’ Title VI Programs Could Prevent Discrimination\*](#). Specific near to medium term metrics include tracking increases in the following:

- Number of civil rights post-award affirmative compliance reviews initiated annually.
- Number of civil rights audits initiated annually to ensure compliance with procedural requirements.
- Percentage of state recipients of EPA financial assistance that have civil rights procedural safeguard elements in place.
- Number of information sharing sessions and outreach and technical assistance events with communities with environmental justice concerns, community groups, and other partners on civil rights and environmental justice issues.
- Number of opportunities identified and implemented by program and regional offices to achieve civil rights compliance in their planning, guidance, policy directives, monitoring, and review activities.

Longer-Term:

- Increase in the number of recipients and applicants of EPA financial assistance with procedural safeguards.
- Increased compliance with civil rights requirements by recipients of EPA funding as a result of a robust affirmative enforcement program, including compliance reviews, pre-award reviews, and post-award compliance activities.

**Public Participation and Community Engagement for EPA has and will include:**

- Engagement with stakeholders including the National Environmental Justice Advisory Council and quarterly through National EJ Community Engagement calls.
- Quarterly meetings with environmental justice and civil rights advocates regarding efforts to strengthen civil rights compliance among recipients and applicants of EPA financial assistance.
- Participation as requested at national and regional convenings regarding environmental justice and civil rights.

## Strategy #4: Protect Children Equitably from Exposure to Environmental Contaminants.

EPA recognizes the need to protect children’s environmental health,<sup>15</sup> especially in communities with environmental justice concerns. EPA strives to protect children from exposures to environmental contaminants by consistently and explicitly considering early life exposures and lifelong health in all human health decisions. Such decisions are made in the context of human health related science, risk assessment, regulations, compliance and enforcement, partnerships, communications, and research.

### Whole-of-Government Equity Objective(s):

- **Health Equity**
- **Educational Equity**
- **Environmental Justice**

**Collaborating Agencies:** U.S. Department of Health and Human Services (HHS), President’s Task Force on Environmental Health Risks and Safety Risks to Children (established by Executive Order 13045), Centers for Disease Control and Prevention (CDC), U.S. Department of Housing and Urban Development (HUD)

### Barriers to Equity:

Children are at greater risk to environmental health impacts due to biological, behavioral, and social factors. Children eat more food, drink more water, and breathe more air in proportion to their body size as compared to adults. Breastfeeding, crawling, and hand-to-mouth contact increase children’s exposure to contaminants. Exposures for even a very short duration at critical life stages can cause adverse health effects. Early life exposures may also result in adverse health impacts later in life or in later generations.

Further, children live in social contexts that affect their cumulative exposures and physiological resilience. Social determinants of health, including poverty and cumulative impacts from environmental exposures in communities with environmental justice concerns, reduce resiliency of children to recover from exposure, which further restricts their ability to develop into healthy and productive adults. Lack of federal resources and self-advocacy exacerbates negative health impacts.

### Evidence Base to Support Strategy:

Environmental exposures cause and contribute to harmful health effects in children.<sup>16</sup> Research shows that social inequities create substantial environmental health disparities that result in pregnancy-related complications that affect the unborn child, adverse health outcomes, and disease.<sup>17</sup> Adverse health impacts on pregnant women and children are exacerbated by climate change, which demonstrates the need to give particular attention to children’s environmental health in climate resilience and adaptation planning.<sup>18</sup>

### Actions to Achieve Equity:

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<sup>15</sup> Children's environmental health refers to the effect of environmental exposure during early life: from conception, infancy, early childhood and through adolescence until 21 years of age. See, e.g., <https://www.epa.gov/system/files/documents/2021-10/2021-policy-on-childrens-health.pdf>.

<sup>16</sup> See, e.g., <https://www.epa.gov/children/childrens-environmental-health-facts>; <https://www.epa.gov/children/childhood-lifestages-relating-childrens-environmental-health>; <https://www.epa.gov/americaschildrenenvironment/key-findings-americas-children-and-environment>; <https://www.nationalacademies.org/our-work/childrens-environmental-health-a-workshop-on-future-priorities-for-environmental-health-sciences>.

<sup>17</sup> See, e.g., <https://www.epa.gov/children/childrens-health-research-regarding-prenatal-and-early-life-exposure-and-long-term-health>; <https://www.epa.gov/children/childrens-health-scientific-journal-articles>.

<sup>18</sup> See, e.g., <https://www.epa.gov/cira/climate-change-and-childrens-health-and-well-being-united-states-report>.

To address the identified barriers and to ensure equitable, meaningful, and improved health for children in communities with environmental justice concerns, EPA will:

- Use available science, research, and policy to strengthen protection for children from the health effects resulting from harmful environmental exposures and reduce environmental disparities for socially vulnerable children. For example, consider available children’s environmental health science in conducting risk assessments, including cumulative risk assessments, and other analyses that drive decisions on pollution reduction rules, environmental standards, and guidance.
- Identify, prioritize, and conduct research to better understand the impact of environmental exposures on children and inform decisions that are protective of children’s health for socially vulnerable communities.
- Devote compliance and enforcement resources to address areas with potential lead exposures to children as noted in the Biden-Harris fact sheet: [New Actions and Progress to Protect Communities from Lead Pipes and Paint](#) and in support of the [EPA Strategy to Reduce Lead Exposures and Disparities in U.S. Communities](#).
- Collaborate with federal partners to advance children’s health protections under the [President’s Task Force on Environmental Health and Safety Risks to Children](#).<sup>19</sup>
- Integrate children’s health considerations into the work of EPA’s regional offices to advance environmental justice.
- Support actions to protect women and children through implementation of EPA’s Action Plan as part of the White House Gender Policy Council’s [National Strategy on Gender Equity and Equality](#). EPA actions relate to promoting gender equity in mitigating and responding to climate change and regulating and reducing exposure to environmental contaminants that pose risks to maternal and children’s health.
- Support actions to protect children’s health through EPA’s implementation of the [White House Blueprint for Addressing the Maternal Health Crisis](#). EPA actions relate to women’s reproductive health risks associated with lead, wildfire smoke, extreme heat, chemical and non-chemical stressors, and the provision of adequate and equitable community-level health care for environmental exposures.
- Support actions to address health disparities in childhood cancer through EPA’s implementation of the [Cancer Moonshot](#). Harmful environmental exposures during childhood, particularly at key life stages (in utero, childhood, adolescence), can impact health later in life and into the next generation. EPA actions relate to preventing exposure to carcinogens and other toxins by compiling data and providing analysis on children’s health used to inform Agency risk assessments and regulations and using partnerships and outreach to increase awareness.

#### **Proposed Metrics:**

Near- to Medium-Term:

EPA will track changes in the following indicators:

- Number of EPA actions that include assessment and consideration of environmental health information and data for children at all life stages to the extent relevant data are available.
- Number of EPA regions with sustainable children’s environmental health programs to engage stakeholders in communities with environmental justice concerns.

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<sup>19</sup> The U.S. Department of Housing and Urban Development (HUD) proposed inclusion of children’s work in their Equity Action Plan. HUD is a partner of EPA under the President’s Task Force on Environmental Health and Safety Risks to Children.



- Number of Pediatric Environmental Health Specialty Unit (PEHSU) consultations to healthcare professionals and community members in communities with environmental justice concerns.
- Number of research products that address children’s environmental health considerations.
- Milestones and metrics enumerated in EPA’s [Strategy to Reduce Lead Exposures and Disparities in US Communities](#) to reduce lead exposure to children.

Longer-Term:

- Improvement in children’s environmental health, based on reduction in environmental exposures to children, particularly children in communities in environmental justice concerns.<sup>20</sup>
- Reduced environmental impacts to children in communities in environmental justice concerns using new data sources and indicators (to be identified) to track national trends in children's environmental health and inform policy decisions.

**Public Participation and Community Engagement for EPA has and will include:**

- Systematic engagement with EPA’s Children’s Health Protection Advisory Committee,<sup>21</sup> the National Environmental Justice Advisory Council, the National Environmental Youth Advisory Council, and other relevant EPA advisory bodies.
- Continued engagement with representatives and members of national non-governmental children’s health organizations that engage with communities to raise awareness and implement place-based solutions on lead, asthma triggers, extreme heat, wildfire smoke, and other relevant environmental health topics.
- Continued engagement with public health practitioners in the Pediatric Environmental Health Specialty Unit (PEHSU),<sup>22</sup> a national network of experts in the prevention, diagnosis, management, and treatment of health issues that arise from environmental exposures from preconception through adolescence.
- Regular engagement with federal partners as part of the *President’s Task Force on Children’s Environmental Health and Safety Risks to Children*,<sup>23</sup> state and local governmental partners, academicians, and researchers through a variety of forums, including symposiums and webinars.

<sup>20</sup> See, e.g., <https://www.epa.gov/americaschildrenenvironment>.

<sup>21</sup> See, e.g., <https://www.epa.gov/children/chpac>.

<sup>22</sup> See, e.g., <https://www.pehsu.net/index.html>.

<sup>23</sup> See, e.g., <https://ptfcehs.niehs.nih.gov/>.

## Strategy #5: Address Inequitable Access to Information and Resources to Improve Engagement and Health Impacts in Rural Communities.

EPA provides financial and technical assistance to small and rural communities to establish and improve services to lower the risk of harm to public health and protect the environment. This strategy continues EPA's work to focus on providing impactful improvements for rural communities.

### Whole-of-Government Equity Objective(s):

- Environmental Justice
- Economic Justice
- Health Equity

**Collaborating Agencies:** U.S. Department of Agriculture (USDA), U.S. Department of Health and Human Services (HHS), U.S. Department of Housing and Urban Development (HUD), Multi-agency Regional Commissions

### Barriers to Equity:

- Gaps in capacity and coordination within the federal family to support economic revitalization, infrastructure improvements, and other community-specific needs.
- Rural communities can include underserved persons who experience inconsistent access to safe drinking water and sanitation services, due to either personal resources (e.g., homeowner well or septic system) or lack of ratepayers for public system maintenance or improvements.
- Rural economies are more dependent on natural resources, which may be disproportionately affected by pollution, chemical exposures, and from climate change.
- Rural communities may receive inequitable access to information and EPA opportunities (e.g., unreliable internet access).
- When equity screening information is needed or encouraged for competitive funding opportunities, a lack of robust data can inadvertently disadvantage rural communities' ability to successfully compete for these resources (e.g., identification of communities in EJScreen and other screening tools).
- Requirements of funding opportunities, imposed through statute, regulation, or practice, can create additional burdens on rural communities (e.g., to perform a feasibility study).
- Limited access to resources (materials, skilled labor, expert consultants, etc.) in rural communities can result in more costly project expenses, delayed timelines, and/or incorrectly scoped projects.

### Evidence Base to Support Strategy:

- Existing information demonstrates that there is a lack of equitable access to adequate wastewater sanitation service in rural areas.<sup>24</sup>
- Existing information shows that rural communities tend to have adverse health disparities compared to non-rural areas.<sup>25</sup>

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<sup>24</sup> See, e.g., <https://www.epa.gov/water-infrastructure/closing-americas-wastewater-access-gap-community-initiative>.

<sup>25</sup> See, e.g., <https://www.ruralhealthinfo.org/topics/rural-health-disparities>; <https://www.cdc.gov/ruralhealth/about.html>; <https://www.cms.gov/blog/addressing-rural-health-inequities-medicare>; [https://www.americanbar.org/groups/crsj/publications/human\\_rights\\_magazine\\_home/the-state-of-healthcare-in-the-united-states/health-equity-challenges-in-rural-america/](https://www.americanbar.org/groups/crsj/publications/human_rights_magazine_home/the-state-of-healthcare-in-the-united-states/health-equity-challenges-in-rural-america/).

- Children in agricultural communities can be disproportionately exposed to certain pesticides based on where they and their families reside.<sup>26</sup>

### **Actions to Achieve Equity:**

To address barriers and to ensure equitable, meaningful, and improved health to rural communities with environmental justice concerns, EPA will:

- Work to provide financial and technical assistance to small and rural communities to establish and improve wastewater treatment services, lower risk of harm to public health, and protect the environment (e.g., *Closing America’s Wastewater Access Gap Community Initiative* – EPA/USDA partnership to help historically underserved communities with environmental justice concerns identify and pursue federal funding opportunities to address their wastewater needs and eliminate harmful exposure to backyard sewage).<sup>27</sup>
- Support water infrastructure using technical, managerial, and financial assistance opportunities in rural communities.<sup>28</sup>
- Provide technical assistance to rural communities to increase access to water and wastewater infrastructure, and other projects that in turn can reduce public health concerns.
- Participate in the USDA-led Rural Partners Network, “an alliance of federal agencies and commissions working directly with rural communities to expand rural prosperity through job creation, infrastructure development, and community improvement.”<sup>29</sup>
- Implement the Agency’s long-term commitment to modernize its financial assistance programs to encourage climate-smart investments in communities across the United States, including rural communities. EPA has established a Resilient Infrastructure Subgroup on Climate to (1) support the agency’s offices with integrating climate adaptation into their financial assistance programs, and (2) make EPA’s tools, training, data, and technical assistance programs discoverable and accessible to applicants and funding recipients.
- Expand grant programs to further address concerns related to farmworkers and their children with the goal of addressing human health impacts in these communities.
- Work to provide access to bilingual (particularly Spanish) labeling on pesticide products with the goal of increasing the availability of pesticide safety information and reducing adverse health impacts.

### **Proposed Metrics:**

EPA will track changes in the following indicators:

Near- to Medium-Term:

- Number of rural community environmental and health indicators added to EPA’s information systems (e.g., [EJScreen](#)).

<sup>26</sup> See, e.g., <https://www.epa.gov/children/childrens-health-protection-advisory-committee-chpac-comment-letters-and-meeting-materials>.

<sup>27</sup> See, e.g., <https://www.epa.gov/newsreleases/biden-harris-administration-launches-epa-usda-partnership-provide-wastewater>; <https://www.epa.gov/water-infrastructure/closing-americas-wastewater-access-gap-community-initiative>; <https://www.epa.gov/small-and-rural-wastewater-systems>; <https://www.epa.gov/septic>.

<sup>28</sup> See, e.g., <https://www.epa.gov/small-and-rural-wastewater-systems/training-and-technical-assistance-ta-program-rural-small-and#overview>; <https://www.epa.gov/small-and-rural-wastewater-systems/lagoon-wastewater-treatment-systems>; <https://www.epa.gov/dwcapacity/training-and-technical-assistance-small-systems-funding>; <https://www.epa.gov/waterfinancecenter/efcn>.

<sup>29</sup> See, e.g., <https://www.rural.gov/>.

- Number of grant application requirements identified for revision to better reflect rural communities.
- Increases in the number of grant applications received from rural areas.
- Changes in the number and type of grants awarded to rural communities.

#### Longer-Term:

- Reduction of health disparities affecting rural community members, including, but not limited to, the health improvement of farmworkers and the children of farmworkers.
- Access to water and wastewater infrastructure, as well as other projects relevant to these communities.
- Changes in the number of rural community environmental health and environmental quality indicators included in EPA's information system (e.g., EJScreen).
- Increases in the number of grant applications that were received from rural areas after any necessary revisions are made to grant application requirements.

#### **Public Participation and Community Engagement for EPA has and will include:**

- Presented draft Equity Plan to EPA's Farm, Ranch & Rural Communities Federal Advisory Committee (*July 2023 ongoing semiannual meetings*).
- EPA participation and interagency coordination in the Biden-Harris Administration's Rural Partners Network, including Community Network Forums (*ongoing*).
- Multiple community engagements occurred in each of the eleven participating communities in the Closing America's Wastewater Access Gap Community Initiative. (*January – July 2023*).
- Other meetings that informed development and implementation of the Equity Plan, including identifying additional barriers and solutions, along with continued engagement in developing new initiatives:
  - Presented bilingual labeling charge questions regarding farmworker access to the National Environmental Justice Advisory Committee (*March 2023, ongoing workgroup*).
  - State FIFRA Issues Research and Evaluation Group Meeting (*April 2023, ongoing semiannual meetings*).
  - Farmworker Advocacy Stakeholder Call (*April 2023, August 2023, ongoing quarterly meetings*).
  - Crop Life America, Reasonable Industry for Sound Environment Conference (*April 2023, August 2023, ongoing quarterly meetings*).
  - Association American Pesticide Control Officials Worker Protection Standards Committee Meeting (*April 2023*).
  - Cross-agency calls with EPA regional offices. (*April – May 2023, ongoing monthly and quarterly calls*).
  - Pesticide Program Dialogue Committee Meeting with Equity and EJ Panel (*May 2023, typically meets semiannually*).
  - [National Webinar](#) regarding Bilingual Pesticide Labels (*June 2023*).
  - Continued community engagement through participation in crop tours, visits to farmworker communities will gauge effectiveness of efforts.
- Continue to identify opportunities for commitments and engagements as resources allow for ground-truthing visits.

## Strategy #6: Ensure Public Access to EPA Programs and Activities and Ensure Full Protection from Health and Environmental Harms for People with Disabilities.

Recent Executive Orders 14091 and 14096 recognize that people with disabilities have historically been vulnerable and disproportionately harmed by exposures to environmental pollution and excluded from critical processes. People with disabilities are likely to be more susceptible to pollution exposure, and often face barriers to meaningful involvement in environmental decision-making. With this strategy, EPA is committing to provide equitable public access for people with disabilities to Agency resources, activities, and services.<sup>30</sup> In addition, EPA is committed to include people with disabilities within the framework of EPA’s Disparity Indicators to ensure full protection from environmental harms for people with disabilities.

### Whole-of-Government Equity Objective(s):

- **Civil Rights**
- **Environmental Justice**

### Barriers to Equity:

- EPA has lacked the capacity to ensure consistent, effective, and well-coordinated reasonable modifications and/or auxiliary aids and services to ensure open access to EPA programs and activities.
- People with disabilities are more likely to have social and economic risk factors, such as poverty and unemployment, that put them at greater risk and exposure to disproportionate and adverse human health and environmental effects. These effects include those related to climate change, the cumulative impacts of environmental and other burdens, and the legacy of racism or other structural or systemic barriers.

### Evidence Base to Support Strategy:

- Executive Order (EO) 14096, *Revitalizing Our Nation’s Commitment to Environmental Justice for All*, broadens the definition of “environmental justice” to include the “just treatment and meaningful involvement of all people, regardless of . . . disability.” The EO includes persons with disabilities, especially children, among the vulnerable communities that must be “protected from disproportionate and adverse human health and environmental effects,” including “cumulative impacts”.
- EPA hosted two internal-facing Accessibility Listening Sessions in spring 2022 as part of its DEIA effort. A report was prepared by an external consultant summarizing accessibility issues employees described that also included a lack of disability access for the public to EPA’s external-facing programs.
- Research affirms that people with disabilities are more likely to experience social and economic risk factors, such as poverty and unemployment, that put them at greater risk and exposure to disproportionate and adverse human health and environmental effects.<sup>31</sup>

### Actions to Achieve Equity:

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<sup>30</sup> EPA also committed in its FY 2022-2026 Strategic Plan that, by September 30, 2026, all its programs and regions will implement program and region-specific disability access plans, as required under [EPA’s Section 504 Regulation at 40 CFR Part 12](#) (EPA responsibilities to ensure access to “federally conducted” programs services and activities).

<sup>31</sup> See, e.g., [Climate Change and the Health of People with Disabilities](#); see also, e.g., [Proximity to extremely hazardous substances for people with disabilities.: A case study in Houston Texas](#); see also, e.g., [Hurricane Harvey and people with disabilities: Disproportionate exposure to flooding in Houston Texas](#).

To address the identified barriers for equitable, meaningful, and improved health and to achieve equity outcomes for people with disabilities, EPA will:

- Develop a clear EPA Directive/Order on Section 504 Procedures for Ensuring Meaningful Access for Persons with Disabilities to EPA Programs Services and Activities, to put into place a clear, consistent, and well-coordinated process for ensuring meaningful access for persons with disabilities.
- Develop program and region-specific disability access plans pursuant to the long-term performance goal under the Strategic Plan to ensure open access (i.e., digital and physical) to all programs, activities, and services conducted by EPA.
- Seek meaningful input from internal and external stakeholders in the development of the directive, including for implementing a fair and prompt public complaint process.
- Identify all necessary resources, including contractual vehicles, EPA must put in place to ensure consistent EPA-wide provision needed services, or “reasonable modifications and/or auxiliary aids and services,” for persons with disabilities.
- Develop and deliver comprehensive training for all EPA staff to ensure meaningful access for persons in the public with disabilities.
- Include in performance evaluations accountability for promoting disability access to EPA’s programs, activities, and services.
- Conduct a physical assessment of EPA facilities to identify disability access issues (including contractor-operated facilities).
- Initiate research on the intersectionality of people with disabilities and other vulnerabilities to equitable access to environmental benefits.

To address disability-based health and environmental disparities, EPA will:

- Initiate research on the intersectionality of people with disabilities and other vulnerabilities and exposures to adverse stressors in the environment, including climate-related stressors.
- Determine whether additional databases and tools for identifying vulnerabilities need to be developed (i.e., research, modifications to EJ Screen, fact sheets, trainings etc.).
- Develop “disability disparity indicators” that EPA can target for mitigation (e.g., reduction in environmental exposures and harms leading to childhood asthma; reduction in exposure to PM2.5 which lead to negative diabetic outcomes, such as oxidative stress and inflammation, etc.).

#### **Proposed Metrics:**

EPA will track changes in the following indicators:

#### **Near- to Medium-Term:**

Progress in addressing *public disability access barriers* will be measured by:

- Increase in the number of events or engagements that include information for members of the public to request reasonable modifications and/or auxiliary aids and services, or about disability access and accessible materials.
- Increase in the number of EPA programs and regions that have implemented program and region-specific disability access plans by FY 2026.
- Increase in the number of reasonable modifications and/or auxiliary aids and services requested versus provided once tracking system is in place.
- Timeliness of providing reasonable modifications and/or auxiliary aids and services to members of the public.

Progress in addressing *disability-based health and environmental disparities* will be measured by:

- Identification of indicators to determine where and how to address disparities affecting people with disabilities.
- Framing of the decision context for considering disproportionate impacts on persons with disabilities to aid in relevant decision-making processes.

Longer-Term:

Long-term outcomes in addressing *public disability access* barriers:

- Improved process for ensuring accessibility for people with disabilities based on number of accessibility complaints received and resolved.

Long-term outcome in addressing *disability-based disparities*:

- Reduction in environmental and health disparities, as reflected in EPA's disparities indicators.

**Public Participation and Community Engagement for EPA has and will include:**

- EPA hosted two internal-facing Accessibility Listening Sessions in spring 2022 as part of its DEIA effort. A report was prepared by an external consultant summarizing accessibility issues employees described that also included a lack of disability access for the public to EPA's external-facing programs.
- Plans to engage people with disabilities in their communities to identify and resolve public access barriers to EPA resources activities, and services.
- Actively partnering with people with disabilities in their communities to identify key research needs and address concerns related to disproportionate health impacts and environmental harms.

## Strategy #7: Strengthening Community-Based Participatory Science to Achieve Environmental Equity in Communities with Environmental Justice Concerns.

EPA envisions a future where all parts of society are increasingly engaged in science and use these data to inform environmental public health and environmental protection actions on local, regional, and national scales. Community-based participatory science is defined as scientific research designed, implemented, and used by the community, often in collaboration with scientists. These efforts facilitate community prioritization, understanding, and use of data to garner resources and inform actions to solve their environmental challenges. Participatory science results in an increase in place-based connections, environmental stewardship, and scientific literacy. Community based participatory science projects engage community members in problem solving and lead to better outcomes for communities.<sup>32</sup> Community-based participatory science is a core component of the [EPA Participatory Science Vision](#).

### Whole-of-Government Equity Objective(s):

- Environmental Justice
- Health Equity

### Barriers to Equity:

Initial barriers were summarized in the [2022 EPA Equity Action Plan](#), Priority Action #5: *Integrate Community Science into EPA's Research and Program*. Implementation must address continuing barriers primarily relating to resourcing and receptivity:

- Access to scientific and technical assistance is often necessary for successful implementation of community science projects. Many communities with environmental justice concerns lack access to resources (such as funding, training and guidance, equipment loan programs, etc.) to develop and implement community-based participatory science programs. Examples listed below illustrate the benefits to communities of partnering with academic, NGO, or government scientists for technical support.
- Investment is needed in planning, data infrastructure, and technical support to strengthen data quality and data management to support the use of community-generated data.
- Anticipated receiving organizations in state, Tribal, and local governments need to be consulted and resourced to integrate and use community science in decision-making.
- Connecting hubs are needed between communities, technical support providers, and receptors in local, state, and federal government for the creation and use of community science.
- Resources (e.g., staff, financial, technical) are needed along the full data pathway from community, universities/technical support, to local, state, and federal entities to enable successful integration of participatory science into decision-making.

### Evidence Base to Support Strategy:

Systematic review of participatory science projects shows that when communities engage in place-based research they can develop beneficial solutions for their local environment and community health. Community science has successfully informed EPA, state, local, and non-governmental decision-making that has improved lives in overburdened communities. The following examples offer models for implementation, emphasizing community capacity building through technical assistance.

- Community-generated and community-led/co-created science has been successfully used to address community public health and to impact decision-making on their behalf, such as

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<sup>32</sup> See: [Participatory Research for Environmental Justice: A Critical Interpretive Synthesis](#).



[Pleasantville Community Air Monitoring](#) (Houston, TX), [Health Impacts of I-10](#) (New Orleans, LA), and [WE ACT Emissions Monitoring](#) (New York (Harlem), NY).

- [California Air Resources Board](#) (CARB; AB 617) supports community steering committees in developing community air monitoring plans for the deployment of monitors. CARB technical support helps to ensure that community air monitoring campaigns produce meaningful results to address community air quality and related environmental public health concerns.
- The EPA [Chesapeake Bay Program](#) collaborated with the [Chesapeake Monitoring Cooperative](#) (CMC) to develop a strategy for providing technical support to volunteer and community scientists. The CMC is also focused on increasing representation and engagement with diverse stakeholders in alignment with the [Bay Program's DEIJ priorities](#). Since 2017, CMC has worked with 117 communities, supporting the generation and integration of 850,000+ data points.
- EPA's Air Sensor Toolbox, established in 2014, provides the latest science on air sensor monitoring systems for technology developers, air quality managers, community scientists and the public. The air sensor [Loan Program](#) provides technical support and sensor loans for community scientists. Since January 2022, the website has been visited 81,000+ times.
- [Pennsylvania's Department of Environmental Protection](#) (PADEP) grants have expanded the number of community-based volunteer watershed associations from 125 to over 560, including funding the Consortium for Scientific Assistance to Watersheds, a team of technical support providers who emphasize a community-based approach. Since 2001, CSAW has assisted 756 communities (57,258 Pennsylvanians) to develop and implement community-driven water quality assessments and supported these communities in putting data to use for local change.

#### **Actions to Achieve Equity:**

To address the identified barriers and support community-based participatory science implementation actions, EPA will:

- Charter a Participatory Science Implementation Workgroup under EPA's Science and Technology Policy Council (STPC) to develop approaches, guidelines, tools, and training to implement the EPA Participatory Science Vision.
- Develop a participatory science implementation guide to serve as a facilitative resource to support the integration and use of data collected by community and volunteer scientists at EPA.
- Conduct outreach to technical support, and local, state, and federal government receiving agencies and community science groups to ascertain their needs with respect to data quality, data management, and resourcing of technical and staff needs.
- Conduct research in and with communities through the Community-Engaged Research Collaborative for Learning and Excellence (CERCLE) in Edison, NJ.
- Fund community science actions through Inflation Reduction Act and/or the Bipartisan Infrastructure Law grant solicitations such as the opportunity for community-driven partnerships to fund monitoring, sampling, and other scientific projects related to reducing pollution and increasing climate resilience through the Environment and Climate Justice Community Change Grant program.

#### **Proposed Metrics:**

EPA will track changes in the following indicators:

#### Near- to Medium-Term:

- STPC Participatory Science Implementation Workgroup is chartered, and the Agency has finalized the Participatory Science Data Management and Assessment Plan by end of calendar year 2023.
- Review of research implementation by the Board of Scientific Counselors (BOSC) Social and Community Science Subcommittee completed by end of FY 2024.
- CERCLE will be staffed and operational by end of FY 2024.
- Percentage and/or number of EPA community grant funds that support science to address environmental justice and equity concerns, including Tribal community science projects.

#### Longer-Term:

- Expanded capacity of communities and local, state, Tribal, and federal governments to share in embracing community science as a valued and routine asset in environmental management as a result of support for community science policies, methods, and data.

#### **Public Participation and Community Engagement for EPA:**

Public engagement builds on recommendations from the [National Advisory Council for Environmental Policy and Technology, 2018](#), consultation, and public comment on barriers. Highlights of recent engagements and ongoing plans include:

- Participatory Science Data Management Workshop (November 2021) engaged community and non-profit organizations, state, Tribal, and federal environmental professionals, and academics.
- Preparation of a report (2023) that identifies success factors based on ten case studies, to support participatory science environmental justice efforts.
- National Water Quality Monitoring Council (2022-2023) hosted five webinars examining participatory science data use at local, state, regional, and national levels.
- Participatory Science Learn and Share (July 2023) explored lessons learned and successes with participatory science from Tribal and state governments.
- On-going engagement with state agencies, Tribal Nations, technical support networks, and community partners, facilitated through the E-Enterprise Leadership Council (EELC) and BOSC Subcommittee on Social and Community Science.

## Strategy #8: Improve Data and Analytic Capacity to Better Identify and Remove Barriers Faced by Communities with Environmental Justice Concerns.

EPA recognizes that our ability to conduct equity assessments (i.e., to understand the impact of our policies on equity outcomes) and identify and remove barriers faced by communities with environmental justice concerns is contingent on gathering and analyzing the necessary data. Disaggregated data, which can be broken down and analyzed by race, ethnicity, gender, disability, income, veteran status, age, or other key demographic variables, is essential to this task. This strategy intends to remove barriers to the availability and use of equitable data<sup>33</sup> (including limitations on the disaggregation of data) within the Agency.

### Whole-of-Government Equity Objective(s):

- **Civil Rights**
- **Environmental Justice**
- **Health Equity**

**Collaborating Agencies:** Agencies covered by the [Evidence Act Title III CIPSES](#) provisions.

### Barriers to Conducting Equity Analyses:

- Limitations on the ability to develop statistical estimates of exposure to environmental hazards at the relevant geographic scale and socioeconomic and demographic characteristics.
- Lack of clarity or guidelines on how to assess progress over time in equity.
- Limitations to data on identifying the geographic scope of the ultimate beneficiaries of EPA actions and the actions of recipients and subrecipients of EPA grant funding.
- Insufficient real-time, continuous monitoring of actual ambient concentrations of pollutants in multiple communities as opposed to a few monitors for an entire metro area.
- Limitations in the statistical, evaluation, and data science capabilities needed to design and conduct equity assessments.
- Limitations on the ability to share data pertinent to equity assessment within and beyond the federal community.

### Evidence Base to Support Strategy:

- Input from external and internal stakeholders on the need for data to track the distribution of Agency benefits and for civil rights enforcement.
- Data skills survey of EPA staff under the Foundations for Evidence-Based Policymaking Act of 2018 ([Evidence Act](#)) highlighted a need for data literacy and skills training, improved awareness of existing data assets and improved culture that focuses on building a data and evidence focus.
- Initial capacity assessment suggesting limitations in our ability to perform robust program evaluation and statistical analyses.

### Actions to Achieve Equity:

To address the identified barriers and improve EPA's capacity to assess, identify, and remove barriers to equitable outcomes, EPA will:

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<sup>33</sup> Equitable data are those that allow for rigorous assessment of the extent to which government programs and policies yield consistently fair, just, and impartial treatment of all individuals. Equitable data illuminate opportunities for targeted actions that will result in demonstrably improved outcomes for communities with environmental justice concerns.

- Identify and aim to fill gaps in data collected by relevant partners and other agencies, that limit our ability to perform robust equity assessments (e.g., compare/combine media data with demographic data to determine a model to map).
- Partner with statistical agencies that have relevant survey or administrative data to develop robust statistical estimates of exposure to environmental hazards disaggregated across relevant dimensions and at an appropriate spatial scale.
- Partner with federal, state, local, and Tribal agencies, and other stakeholder groups to share data where appropriate to build larger more robust interoperable data for equity analyses.
- Strategically invest in human capital to advance equity assessments including, leveraging EPA data skills training program with additional resources specific to equity analysis.
- Leverage our community-based participatory science partners to enhance communities' capacity to understand and use data and tools relevant to their specific concerns.
- Develop equity evaluation guidelines for conducting EPA program evaluations supported by equitable data approaches.
- Improve ways we share the data EPA manages and the tools that allow external parties to view, analyze or otherwise interact with our data, especially in an equity context (e.g., EJScreen).
- Develop and manage a [new cooperative agreement program](#) designed to assist EPA grant recipients representing small, underserved, and/or Tribal communities with data, reporting and evidence-building.

**Proposed Metrics:**

EPA will track changes in the following indicators:

**Near- to Medium-Term:**

- Identification of data gaps that limit our ability to perform equity assessments, and number of those data gaps addressed through data collection, data sharing, or statistical estimation.
- Use of data in program evaluations to assess the equity outcomes of EPA programs.
- Number of equity-aligned data and analytics training sessions given, or modules provided.
- Number of cooperative agreements supporting the data, reporting, and evidence-building of EPA grant recipients representing small, underserved, and/or Tribal communities.
- Number of EPA grant recipients provided assistance through EPA's cooperative agreement program designed to assist small underserved, and/or Tribal communities with data, reporting, and evidence-building.

**Longer-Term:**

- Expanded EPA staff capacity to identify data gaps and engage in equity assessments.
- Expanded capacity of EPA grant recipients representing small, underserved, and/or Tribal communities in responding to EPA grant data and reporting requirements and engaged in evidence-building.
- Measurable reduction in disparities as reflected by identified indicators of health disparities.

**Public Participation and Community Engagement for EPA in this strategy is often incorporated within our previously mentioned key equity strategies and includes:**

- Interviews and discussions with external parties designed to help us improve our support to grantees from small and/or underserved communities as they address data, reporting, and evidence-building.

- Implementing Community-Based Participatory Science (Strategy #7 above), as an example of other community engagement activities that will promote increased capacity for equity assessments.