

Additional Qs and As from EPA’s CPRG Grantee Training on Low-Income and Disadvantaged Communities Benefits Analysis

Note: This document provides answers to additional questions that were not answered during EPA’s live CPRG webinar on Low-Income and Disadvantaged Communities Benefits Analysis on August 16, 2023, due to time constraints, as well as extended answers to some questions answered during the webinar.

Q1: For defining Low-Income and Disadvantaged Communities (LIDAC), why is EPA prescribing using any census block group that is at or above the 90th percentile for any of EJScreen’s Supplemental Indexes when compared to the nation or state? EJScreen and many environmental justice (EJ) analyses use the 80th percentile.

In January 2023, the White House Council on Environmental Quality (CEQ) and Office of Management and Budget provided interim guidance about using Climate and Economic Justice Screening Tool (CEJST) to designate disadvantaged communities across all IRA programs. EPA’s EJScreen tool has more emphasis on environmental variables. EJScreen at the 90th percentile identifies a very similar (but not completely overlapping set) of areas to CEJST; however, the unit of analysis is different (i.e., CEJST uses census tracts, and EJScreen uses block group level). In doing the analysis, EPA determined that CEJST at the census tract level may miss certain block groups that EJScreen identified. Accordingly, EPA worked with CEQ to add a narrow set of additional block groups identified by EJScreen at the 90th percentile.

Q2: If states or metropolitan areas have a definition of low-income and/or disadvantaged communities, can we use that definition?

When developing the low-income and disadvantaged communities benefits analysis, grantees should use the following definition:

Any community that meets at least one of the following characteristics:

- Identified as disadvantaged by the CEJST;
- Any census block group that is at or above the 90th percentile for any of EJScreen’s Supplemental Indexes when compared to the nation or state; or,
- Any geographic area within tribal lands as included in EJScreen

In the CPRG planning grant program guidance, EPA strongly encouraged the use of CEJST 1.0 or higher. In the subsequent Technical Reference Document for Low-Income and Disadvantaged Communities Benefits Analysis, EPA provided further guidance strongly recommending CEJST with EJScreen as a supplement to CEJST. Grantees may use either CEJST or EJScreen or a combination of the two to identify communities.

EPA acknowledges that state or metropolitan areas may have alternative definitions for disadvantaged communities. Grantees may describe additional benefits to communities that do not fit EPA’s definition of low-income and disadvantaged communities elsewhere in their PCAPs and CCAPs, including in the Benefits Analysis. However, when quantifying or qualifying benefits to low-income and disadvantaged communities to satisfy the community benefits analysis requirement under the PCAP, planning grant recipients need to do so for communities identified by applying EPA’s definition for such communities under the CPRG program.

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Q3: Where can I find data of census tracts and census block groups that are low-income and disadvantaged using EPA’s definition?

EPA has provided a layer to EJScreen that combines CEJST and EJScreen data to identify whether a community is disadvantaged for the purposes of implementing EPA programs under the Inflation Reduction Act, including the CPRG program. The EJScreen layer can be found on the EJScreen tool under the “Places” tab and by selecting “EPA IRA Disadvantaged”:
<https://ejscreen.epa.gov/mapper/>.

The underlying data for this layer is available for download here:

https://gaftp.epa.gov/EPA_IRA_Public/. The database provides a list of all U.S. census tracts and identifies which are designated as disadvantaged and provides the data in two formats: text file (.csv) and geodatabase file (.gdb). An ArcGIS map identifying disadvantaged communities for purposes of EPA IRA programs is available here:

<https://epa.maps.arcgis.com/home/item.html?id=f3be939070844eac8a14103ed6f9affd>.

Q4: What is the difference between the EJScreen Justice40/IRA and EPA IRA Disadvantaged Communities layers?

The EJScreen layer labeled “Justice40 (CEJST)” includes communities identified as disadvantaged using just CEJST data.

The EJScreen layer labeled “EPA IRA Disadvantaged Communities” includes communities identified as disadvantaged using both CEJST and EJScreen datasets to include:

- Any census tract that is included as disadvantaged in CEJST
- Any census block group at or above the 90th percentile for any of EJScreen’s Supplemental Indexes when compared to the nation or state, and/or
- Any geographic area within tribal lands, as included in EJScreen.

Q5: For providing potential benefits, could you include indirect and induced jobs as well as direct?

Yes. Measures to reduce GHG emissions can provide multiple types of benefits to low-income and disadvantaged communities including: 1) direct *and indirect* benefits associated with mitigating these climate impacts; 2) public health benefits due to associated reductions in criteria and hazardous air pollution; and, 3) other benefits resulting from these measures. Therefore, indirect and induced jobs can be included as potential benefits.

Q6: Is there a point of contact for CPRG planning grantees to send questions about EJScreen?

CPRG planning grantees may submit questions about EJScreen by filling in their questions using the form found here: <https://www.epa.gov/ejscreen/forms/contact-us-about-ejscreen>. For general questions about the CPRG planning grants, grantees may email CPRG@epa.gov or [contact their EPA regional Project Officer](#).