

February 15, 2023

The Honorable Shalanda D. Young
Director of the Office of Management and
Budget

CC:
Chair James Comer
House Committee on Oversight

The Honorable Gene L. Dodaro
Comptroller General
U.S. Government Accountability Office

Ranking Member Jamie Raskin
House Committee on Oversight

The Honorable John Podesta
Senior Advisor to the President for
Clean Energy Innovation and
Implementation

Chair Gary Peters
Senate Committee on Homeland Security
and Governmental Affairs

The Honorable Ali Zaidi
White House National Climate Advisor

Ranking Member Rand Paul
Senate Committee on Homeland Security
and Governmental Affairs

Dear Director Young, Comptroller General Dodaro, Senior Advisor Podesta, and National
Advisor Zaidi,

On behalf of our millions of members and supporters, we write to express our strong support for
the following oversight and accountability provisions included the [Inflation Reduction Act](#):

SEC. 70005. Office of Management and Budget Oversight. *In addition to amounts otherwise available, there are appropriated to the Director of the Office of Management and Budget for fiscal year 2022, out of any money in the Treasury not otherwise appropriated, \$25,000,000, to remain available until September 30, 2026, for necessary expenses to— (1) oversee the implementation of this Act; and (2) track labor, equity, and environmental standards and performance.*

SEC. 70004. Government Accountability Office Oversight. *In addition to amounts otherwise available, there is appropriated to the Comptroller General of the United States for fiscal year 2022, out of any money in the Treasury not otherwise appropriated, \$25,000,000, to remain available until September 30, 2031, for necessary expenses of the Government Accountability Office to support the oversight of— (1) the distribution and use of funds appropriated under this Act; and (2) whether the economic, social, and environmental impacts of the funds described in paragraph (1) are equitable.*

Many of our groups supported the efforts by the House Committee on Oversight and Reform (COR) and the Senate Homeland Security and Governmental Affairs Committee (HSGAC) to ensure their inclusion in the Inflation Reduction Act. They are part of our broader efforts to include strong standards and guardrails¹ across the Inflation Reduction Act in order to ensure that federal investments reverse—rather than reinforce— existing

¹ The [resources linked here](#) offer an illustrative list of such standards.

racial, economic, and social inequities and environmental harms.

We therefore urge you to engage our groups, partners, and allies in an equitable implementation of these provisions, grounded in the principles that follow.

Principles for implementation

- 1. Equitable engagement and representation in identifying and tracking cross-cutting standards.** To uphold the congressional intent of these provisions, the Biden Administration needs to identify cross-cutting labor, equity, and environmental standards for OMB to track. This creates an opportunity for the Administration to ensure a coherent, whole-of-government approach to IRA implementation, in which multiple agencies work to uphold a core set of high-road standards that apply across agencies, offices, and programs –including and going beyond Justice40. These standards, tracked by OMB, also could inform the metrics that GAO uses to assess the distributional, economic, social, and environmental impacts of IRA funds. Impacted communities and stakeholder groups must play a central role in helping the Administration to identify standards that are sufficiently strong and reflective of on-the-ground realities, drawing from best practices among government agencies and helping to craft new standards where gaps exist. Many of our groups have worked arduously with stakeholders, including impacted communities, to develop broadly backed standards and guardrails for public investment. To ensure that those voices are heard, we respectfully request to be meaningfully engaged in discussions and decisions, alongside other allies, regarding which standards should be tracked and how investment impacts should be evaluated. We particularly strongly urge you to **allocate part of the funds of Section 70004 and Section 70005 to enable members of disadvantaged communities that are normally marginalized from such processes to participate in the identification of cross-cutting standards and the implementation of these IRA provisions, including through the creation and meaningful engagement of an Advisory Committee. The Advisory Committee should be composed of representatives of impacted communities and workers, in addition to relevant public interest stakeholder groups.** We also urge you to regularly solicit and meaningfully incorporate feedback from the public on the implementation of these provisions through public comment and public hearing opportunities, as well as other appropriate means.
- 2. Rigorous oversight above and beyond OMB and GAO’s ordinary mandate.** In Section 70004 and Section 70005, Congress charges OMB and GAO with tasks that go above and beyond their ordinary oversight responsibilities: tracking labor, equity, and environmental standards and performance, and the economic, social, and environmental impacts of IRA funds. This **funding should be utilized explicitly for the direct purpose of additional capacity, oversight, and accountability processes, including staffing at the agencies for the explicit implementation of these provisions: to track and monitor these standards and impacts of IRA programs and funds. The staff hired to implement these provisions should be qualified by training, education, and experience to track and assess these standards and impacts in a way that addresses the priorities of impacted communities.** In particular, part of the intent of these provisions is to extensively monitor the equity of distribution and impact of funds across

demographics, utilizing a broad set of metrics, and we encourage the agencies to utilize these funds for this explicit purpose.

3. **Transparency.** Frontline communities have experienced historic exclusion and discrimination against participating in government benefits due to discriminatory policies and practices. The assessments of OMB and GAO must be transparent and accessible to impacted communities and stakeholders in order for Section 70004 and Section 70005 to be effective in helping ensure that IRA funding advances broadly-shared economic, equity, and environmental outcomes. We encourage your offices to work closely with agencies and offices already charged with developing social, economic, and environmental standards such as the Good Jobs Initiative led by the Department of Labor, environmental standards of the Environmental Protection Agency, and the White House Justice40 Initiative development of equity standards across agencies. In addition to regular reporting to the House Committee on Oversight and Reform on the implementation of Section 70004 and Section 70005, we urge you to establish a user-friendly mechanism to regularly report to our groups and the public at large. For IRA funds already being distributed, we ask that you and the agencies responsible for allocating those funds provide detailed documentation on project selection and evaluation, including **an online information hub that centralizes OMB’s findings on whether and how IRA programs are meeting the cross-cutting labor, equity, and environmental standards identified with input from impacted communities, in addition to GAO’s findings on the distributional, social, economic, and environmental impacts of IRA programs.**

4. **Accountability.** Section 70004 and Section 70005 will only serve their oversight purpose if OMB and GAO create effective mechanisms that hold implementing agencies accountable for tracking labor, equity, and environmental standards and performance, and evaluating the economic, social, and environmental impacts of the funds they administer. **We urge you to establish such monitoring mechanisms, to report on their effectiveness, and to advise Congress and the President on enforcement as needed to deliver key outcomes: (i) a reduction in poverty, economic insecurity, and racial, economic, and gender inequities from expanded access to good union jobs, particularly in disadvantaged communities; (ii) healthy communities, free from exposure to toxic pollution, with a focus on communities facing disproportionate environmental burdens; and (iii) healthy ecosystems and a stable climate.**

Thank you for your consideration of these important matters.

Sincerely,

198 methods

350 Mass

350 Bay Area Action

350 Montana

350 Central Mass

350 New Hampshire

350 Conejo / San Fernando Valley

350 New Orleans

350 Triangle
7 Directions of Service
A Community Voice
Accelerate Neighborhood Climate Action
Action for the Climate Emergency (ACE)
Activist San Diego
Alliance of Nurses for Healthy Environments
American Friends Service Committee
Animals Are Sentient Beings Inc
Asian Pacific Environmental Network
Beyond Extreme Energy
BlueGreen Alliance
Boulder Energy Task Force
Brighter Green
Businesses for a Livable Climate
California Communities Against Toxics
California Green New Deal Coalition
Call to Action Colorado
CatholicNetwork US
Center for Biological Diversity
Center for Coalfield Justice
Citizen's Alliance for a Sustainable Englewood
Citizens Caring for the Future
Clean Energy Action
Clean+Healthy
Climate Hawks Vote
Climate Justice Alliance
Climate Reality Massachusetts Southcoast
Climate Reality Project, New Orleans Chapter
CO Businesses for a Livable Climate
CO Dem Party - Energy and Environmental Initiative
Coalition Against Death Alley
CODEPINK S.F. Bay Area
Communities United for Restorative Youth Justice
Community for Sustainable Energy
Concerned Citizens of St. John
Concerned Health Professionals of Pennsylvania
Delaware Riverkeeper Network
Demand Progress
Democratic Socialists of America - Knoxville, TN
Demos
Dogwood Alliance
Earth Action, Inc.
East Michigan Environmental Action Council
ecoAmerica
Elders Climate Action
End Climate Silence
Endangered Species Coalition
Extinction Rebellion Peace
Faith Alliance for Climate Solutions

Florida Rising
For the Many
Fox Valley Citizens for Peace & Justice
Georgia WAND
Giniw Collective
Global Alliance for Incinerator Alternatives (GAIA)
Grassroots Global Justice Alliance
Greater New Orleans Housing Alliance
Greater New Orleans Interfaith Climate Coalition
Green New Deal Network
GreenFaith
Health Care Without Harm
Healthy Ocean Coalition
Honor the Earth
I-70 Citizens Advisory Group
Inclusive Louisiana
Indivisible Ambassadors
Indivisible Highland Park NJ
Institute for Local Self-Reliance
Institute of Common Sense
Iowa CCI
Ironbound Community Corporation
Just Transition Alliance
Kentucky interfaith power and light
Larimer Alliance for Health, Safety and Environment
League of Conservation Voters
Littleton Business Alliance
Long Island Progressive Coalition
Louisiana Bucket Brigade
Louisiana League of Conscious Voters
Maine People's Alliance
Mayfair Park Neighborhood Association Board
Media Alliance
Mental Health & Inclusion Ministries
Michigan Environmental Justice Coalition
Micronesia Climate Change Alliance
MN350
Montana Environmental Information Center
Montbello Neighborhood Improvement Association
Mothers Out Front
MoveOn.org Hoboken
Mujeres Unidas y Activas
Natural Resources Defense Council
NC Climate Justice Collective
Network for a Sustainable Tomorrow
Network Lobby for Catholic Social Justice
New Alpha Community Development Corporation
New Energy Economy
New Mexico Climate Justice
New Mexico Women's March
New York Lawyers for the Public Interest
Nicaragua Center for Community Action

NM No False Solutions

North American Climate. Conservation and Environment(NACCE)

North Range Concerned Citizens

Nuclear Energy Information Service (NEIS)

Nuclear Information and Resource Service

NY Renews

Ocean Conservation Research

Ocean Defense Initiative

Our Revolution Michigan

Parable of the Sower Intentional Community Cooperative

Partnership for Policy Integrity

Passionist Solidarity Network

Peace, Justice, Sustainability NOW

People's Action

Physicians for Social Responsibility Pennsylvania

PowerSwitch Action

Presente.org and Alianza Americas

PrimaveraZur

Progressives for Climate

Public Citizen

Pueblo Action Alliance

Putnam Progressives

RapidShift Network

Rebuild by Design

Resist the Pipeline

Right to the City Alliance

Rise Up WV

Santa Fe Forest Coalition

Save EPA (former employees)

SaverLife

Schools for Climate Action

Scientist Rebellion Turtle Island

SEIU

Sierra Club

Sisters of Mercy of the Americas Justice Team

Sisters of St. Dominic of Blauvelt, New York

Social Eco Education (SEE-LA)

Social Security Works

South Asian Fund For Education Scholarship and Training Inc

Southern Economic Advancement Project

Southwest Organization for Sustainability

Spirit of the Sun, Inc.

SPLC Action Fund

Stand.earth

Sunrise Movement

System Change Not Climate Change

Terra Advocati

Texas Impact

The Green House Connection Center

The Imani Group Inc

The Quantum Institute

The United Methodist Church - General

Board of Church and Society

Toxic Free NC

Turtle Island Restoration Network

Unitarian Universalists for a Just Economic
Community

Unite North Metro Denver

United Food and Commercial Workers Local
1445

UPROSE

Vote Climate

Wall of Women

Waterspirit

Western Slope Businesses for a Livable
Climate

Women Working Together USA

Womxn from the Mountain

Working Families Party

Working for Racial Equity