

Additional Questions for the Record

**Mr. Zealan Hoover, Senior Advisor to the Administrator,
Environmental Protection Agency**

The Honorable Morgan Griffith

1. In response to my questions at the hearing, you stated that the Environmental Protection Agency (EPA) would “assign a certified project officer to manage the grant and ensure compliance with all of its terms and conditions.”
 - a. How many grants will each of these project officers be assigned to monitor?
 - b. How many project officers will be assigned to each grantee, or for each award?

EPA RESPONSE: EPA has made grant selections and as those selections were made, EPA assigned each grant a project officer in accordance with standard EPA practice. As of April 4, 2024, EPA has selected 68 grants for funding, and each grant has been assigned a project officer who has completed EPA grant project officer training and certification. The grantee workload of a given project officer will be commensurate to the scope and scale of the grant(s), and the experience of a given project officer. The project officers are supported in their duties by the Office of the Greenhouse Gas Reduction Fund and other staff at EPA.

2. In response to my questions at the hearing, you stated that “the program office will review the standard reporting and audits and conduct their own additional performance audits as necessary.” Please provide more detail about these “additional performance audits” and how the EPA will determine whether these additional audits are necessary.

EPA RESPONSE: I share your commitment to make sure that Greenhouse Gas Reduction Fund (GGRF) resources are subject to strict controls and rigorous oversight. As with any grant, EPA staff including project officers conduct ongoing reviews of recipients’ administration of financial assistance agreements, as indicated in EPA Order 5700.6. We expect that the terms and conditions of GGRF grants, as provided in 2 C.F.R. § 200.208, will authorize the project officer to closely monitor recipient performance and compliance with grant requirements. Greenhouse Gas Reduction Fund administrative monitoring will be conducted by personnel in EPA’s Office of Grants and Debarment. Further, EPA’s Office of the Chief Financial Officer will provide the universe of data for the Greenhouse Gas Reduction Fund transactions and personnel from the Office of the Greenhouse Gas Reduction Fund will conduct transaction testing using EPA procedures for verifying recipient compliance with the Payment Integrity Information Act of 2019. Improper payment concerns will be addressed by Office of Grants and Debarment award officials.

Finally, all recipients and many subrecipients will be subject to the Single Audit Act as implemented in 2 C.F.R. Part 200, Subpart F. The Single Audit Act is currently triggered when a non-federal entity expends more than \$750,000 of federal funding during its fiscal year. Specifically, a Single Audit reviews a program’s financial statements; internal controls; and compliance with federal regulations, statutes, and the terms and conditions of the grant agreement, per 2 C.F.R. § 200.514. Further, the Greenhouse Gas Reduction Fund programs qualify as Major Federal programs for additional auditing purposes per 2 C.F.R. § 200.503(e).

3. In response to my questions at the hearing, you stated that the EPA’s “Inspector General’s Office will conduct their own oversight activities and audits that are in addition to the program-led audits and the standard audits required under the yellow and green book.”
 - a. In written testimony before this Subcommittee, on March 29, 2023, EPA Inspector General Sean O’Donnell stated, “the [Inflation Reduction Act] fails to provide any funds for EPA [Office of the Inspector General] oversight.”¹ Has the EPA discussed the challenges the Office of the Inspector General (OIG) faces in conducting oversight of the Greenhouse Gas Reduction Fund and other Inflation Reduction Act programs due to the lack of additional OIG funding in that legislation?

EPA RESPONSE: In the President’s FY 2025 Budget, EPA requested an increase of \$22 million for our Inspector General’s office.

- b. In another hearing before the Subcommittee on September 13, 2023, in response to questions from Energy and Commerce Committee Chair Cathy McMorris Rodgers regarding whether the EPA has an internal auditing system, Inspector General O’Donnell replied, “So I’m not aware that the EPA has a unit internal – for internal audit. I’ve never seen it. We’ve asked. No, I don’t believe they do.”² In order to help the Subcommittee reconcile your response with the Inspector General’s, can you please describe in further detail the “program-led audits and standard audits” that you referenced in your response to me?

EPA RESPONSE: While I am not in a position to speak for Mr. O’Donnell, EPA considers the Office of Inspector General to be one of several layers of oversight at EPA that protect program integrity. As described in detail above in response to your second question, additional oversight is conducted by the grant project officer, by EPA’s Office of Grants and Debarment, and by EPA’s Office of the Chief Financial Officer.

¹ *Follow the Money: Oversight of President Biden’s Massive Spending Spree: Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce, 118th Cong. (2023)* (written statement of Sean O’Donnell, Inspector General, Environmental Protection Agency).

² *Making the Grade?: Audit of the Environmental Protection Agency’s Clean School Bus Program: Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Energy and Commerce, 118th Cong. (2023)* (response of Sean O’Donnell, Inspector General, Environmental Protection Agency (responding to questions from Cathy McMorris Rodgers, Chair, House Energy and Commerce Committee).

- c. In response to my question about whether subrecipients would be subject to audit requirements, you stated, “I would be happy to provide more information on those standards.” Please provide any additional information you have on this.

EPA RESPONSE: Subawards are a well-established means through which a recipient can pass-through federal funds to other entities in order to carry out part of a Federal award. Subrecipients are subject to Single Audit Act requirements described above. When a recipient provides a subaward, the recipient is characterized as a *Pass-through entity*, as defined in 2 C.F.R. § 200.1. The *Subrecipient*, as defined in 2 CFR 200.1, is an entity “that receives a subaward from a pass-through entity to carry out part of a Federal award.” EPA provides extensive guidance to pass-through entities in EPA’s Subaward Policy and in related materials available on the Agency’s website. The Subaward Policy provides information to pass-through entities on how EPA oversees pass-through entity performance and includes information regarding what types of projects may be carried out through subawards. EPA also provides information on statutory, regulatory, and Executive Order requirements to assist pass-through entities who make subawards under the Uniform Grant Guidance to identify federal requirements that may apply to subrecipients on EPA funded projects. EPA pays particular attention to the capabilities of nonprofit organizations who are recipients of pass-through funding, utilizing the procedures established in EPA Order 5700.8, which prescribes uniform pre-award procedures for evaluating the administrative and programmatic capabilities of non-profit applicants and establishes uniform post-award procedures for addressing any material failures to comply by non-profit recipients.

EPA shares your commitment to make sure that Greenhouse Gas Reduction Fund resources are subject to strict controls and rigorous oversight. EPA staff conduct ongoing reviews of recipients’ administration of financial assistance agreements, as indicated in EPA Order 5700.6. Greenhouse Gas Reduction Fund administrative monitoring will be conducted by personnel in EPA’s Office of Grants and Debarment. Further, EPA’s Office of the Chief Financial Officer will provide the universe of data for the Greenhouse Gas Reduction Fund transactions and personnel from the Office of the Greenhouse Gas Reduction Fund will conduct transaction testing using EPA procedures for verifying recipient compliance with the Payment Integrity Information Act of 2019. Improper payment concerns will be addressed by Office of Grants and Debarment award officials. Finally, recipients—and, in many cases, subrecipients—will be subject to the Single Audit Act as implemented in 2 C.F.R. Part 200, Subpart F. The Single Audit Act is currently triggered when a non-federal entity expends more than \$750,000 of federal funding during its fiscal year. Specifically, a Single Audit reviews a program’s financial statements; internal controls; and compliance with federal regulations, statutes, and the terms and conditions of the grant agreement, per 2 C.F.R. § 200.514.

In terms of environmental data quality, 2 C.F.R. § 1500.12 requires that Quality Assurance (QA) applies to all assistance agreements involving environmental information. EPA QA requirements have been included in the Grant Terms and Conditions requiring submission of both a Quality Management Plan (QMP) prepared in accordance with the EPA QMP Standard and Quality Assurance Project Plan (QAPP) prepared in conformance with the EPA QAPP Standard to demonstrate compliance with the EPA Quality System and assure the quality of the environmental information received. These requirements flow down from the Prime Grantee to subgrantees. EPA will evaluate Prime Grantee conformance to QA requirements via assessments of their Quality System documentation and the data submitted to EPA. Prime Grantees will assess subgrantee conformance to EPA quality requirements via assessments of their subgrantee Quality System documentation and the data submitted to Prime Grantee.

4. As Chair Rodgers referenced in her questioning, according to *E&E News*, the EPA stated in reference to the National Clean Investment Fund and the Clean Communities Investment Accelerator competitions, “Copies of applications selected for funding under these opportunities may be made publicly available on the [Greenhouse Gas Reduction Fund] website or another public website for a period of time after the selected applications are announced.”³ Will the EPA make these publicly available? If so, when and where?

EPA RESPONSE: We have made selected applications under these two competitions publicly available on EPA’s website at <https://www.epa.gov/greenhouse-gas-reduction-fund/national-clean-investment-fund> and <https://www.epa.gov/greenhouse-gas-reduction-fund/clean-communities-investment-accelerator>.

5. Representative Duncan asked about how you would evaluate applicants that were new organizations, including coalitions of existing applicants. In response, you stated, “we have been looking at a wide range of past performance indicators and also their forward-looking investment strategies.” What specific information did the EPA request from applicants in considering these factors, and how did it evaluate past performance of coalitions that are newly formed?

EPA RESPONSE: EPA developed a two-phased strategy regarding selected applicants’ risk management capabilities. Since the National Clean Investment Fund is a grant program to financing entities whereas the Clean Communities Investment Accelerator is a grant program to entities that pass-through the funding to financing entities, EPA has taken a slightly different approach to implementing this strategy so that the risk management plans are tailored to the types of activities involved in each program. First, EPA required applicants to submit detailed risk management plans, which were reviewed and scored by teams of experts from across the federal government. Second, EPA will hold selected applicants accountable to the robust risk management plans that they submitted as well as include specific terms and conditions in the grant award agreements that set standards for all selected applicants to meet or exceed. These terms and conditions were developed in concert with interagency and cover

financial risk management, governance, consumer financial protection, and other critical risk management areas.

6. In the Notice of Funding Opportunity for the Solar for All program that the EPA released last year, the EPA states, “EPA will provide further guidance on which projects are subject to [Build America, Buy America Act] provisions and will work with grantees to support implementation as necessary.”⁴
- a. What additional guidance will the EPA provide to grantees, and when does it expect this guidance to be available to them?

EPA RESPONSE: A major focus of the Inflation Reduction Act is setting the United States up to win the clean energy, 21st century economy and the jobs that come with it. We share your focus on ensuring that this program strengthens our economic competitiveness. We are including terms and conditions in the award agreements to reinforce that all grants are subject to Build America, Buy America (BABA) by statute. Presentations and other guidance on BABA is available on an EPA web site <https://www.epa.gov/cwsrf/build-america-buy-america-baba-resources>.

- b. The Notice of Funding Opportunity for the Solar for All Program also states that applications for this program will be evaluated on the recipient’s plan to dedicate planning capacity to incorporating this forthcoming guidance.⁵ How can applicants demonstrate to the EPA they can comply with the Build American Buy America Act (BABA) requirements if they do not know yet how they will be applied?

EPA RESPONSE: BABA applies to all infrastructure projects, which is defined in the BABA statute and in OMB guidance. The quoted language from The Notice of Funding Opportunity linked applicants to EPA’s Build America, Buy America (BABA) [webpage](#), which contains cross-program information on EPA’s BABA implementation framework, links to OMB’s guidance 2 CFR 184 and M-24-02, waiver authority, EPA’s approved waivers, EPA waivers open for public comment, stakeholder presentations, points-of-contact for questions regarding BABA, and other relevant information. As awards are finalized, EPA expects to furnish recipients with additional implementation procedures specific to these programs.

7. How has the EPA assessed applicants’ abilities to comply with BABA for all three funding competitions that you referenced at the hearing?

EPA RESPONSE: Applicants to the National Clean Investment Fund and Clean Communities Investment Accelerator were required to “describe [their] plan to comply with the requirements of the Build America, Buy America Act,” which was reviewed by a panel of expert reviewers who assessed the quality and extent to which that plan identified “the activities that will be involved and the resources that will be required to execute against those activities.” Applicants were expected to come with a robust plan for BABA compliance with a clear plan for implementation—including resourcing, policies and procedures, and more.

Applicants to Solar for All were required to include “an implementation timeline narrative with clear and reasonable milestones for developing” their programs, which was reviewed by a panel of expert reviewers who assessed the quality and extent of their plan to “dedicate program planning capacity to incorporate Build America, Buy America to Solar for All program operations.” Applicants were expected to develop robust plans for BABA compliance, calibrated to relevant market conditions by coordinating with industry stakeholders including solar industry experts and federal technical assistance.

8. Does the EPA anticipate proposing any waivers under BABA for any of the three programs?

EPA RESPONSE: EPA will work with recipients if they request project-specific waivers that align with EPA’s waiver authority under BABA and are supported by robust market research. Any such waiver request will be reviewed in accordance with the statutory bases outlined in 2 CFR 184 and OMB Memorandum M-24-02, including the requirement for proposed waivers to be submitted for public comment for a period of at least 15 days, and for waivers to be targeted, conditional, and time-limited.

9. Has the EPA looked into or performed any research regarding whether complying with BABA requirements for projects funded under the Greenhouse Gas Reduction Fund programs is feasible?
- a. Has the EPA discussed this with applicants or other stakeholders?
 - b. Have applicants expressed concern about being able to meet the BABA requirements, should they be selected for an award?

EPA RESPONSE: EPA required applicants to NCIF and CCIA to explain their plan to comply with BABA requirements. Similarly, EPA required applicants to Solar for All to dedicate resources to leveraging technical assistance and develop plans to comply with BABA requirements prior to investing in projects. In their responses, applicants did not express significant feasibility challenges or concerns but rather provided robust plans for compliance and implementation. All selected applicants will need to meet BABA requirements on infrastructure projects, and EPA will hold selected applicants accountable to BABA requirements through the terms and conditions of the award agreements.

³ Jean Chemnick, *EPA Interviews Nonprofits to Run \$14B*, E&E NEWS, Jan. 23, 2024, <https://subscriber.politicopro.com/article/eenews/2024/01/23/interviews-underway-in-epa-contest-to-run-14b-green-bank-00136663>.

⁴ Env'tl. Prot. Agency, Office of the Greenhouse Gas Reduction Fund, EPA-R-HQ-SFA-23-01, Request for Applications: Solar for All 64-65 (Aug. 31, 2023) (revised).

⁵ *Id.* at 59.

10. How will the EPA make sure that organizations receiving funding through the program, either directly or as subrecipients, comply with the BABA requirements?

EPA RESPONSE: Recipients will be legally obligated to comply with BABA requirements on infrastructure projects and to enforce such compliance with subrecipients through the terms and conditions of their subawards as well as monitoring responsibilities under 2 CFR 200.332. This includes ensuring that the documentation collected for products used in infrastructure projects is sufficient to demonstrate compliance with BABA requirements. EPA has the right to access such documents to for compliance purposes, in accordance with 2 CFR 200.337, *Access to records*.

11. Will the EPA continue to monitor or track the activities of grantees and the success of projects funded after the period of performance for each grant is over?

EPA RESPONSE: Yes. After the period of performance for each grant is complete, the recipient will still be held accountable to detailed terms and conditions on the use of program income contained in close out agreements authorized by 2 CFR 1500.8(d). These terms and conditions will include reporting requirements that enable EPA to continue to monitor and track activities of the grantees and the success of projects funded—even after the period of performance for each grant is over.

12. Are there any restrictions on how grantees can use any repayments and revenue once the period of performance ends? Are there any restrictions on their activities after the performance period ends, as a condition of receiving so much government funding? If so, how will the EPA monitor this?

EPA RESPONSE: After the period of performance for each grant is complete, the recipient will still be held accountable to detailed terms and conditions on the use of program income through the close out agreements mentioned in the response to Question 11. The close out agreements are imbedded in the award terms such that they are a condition of receiving the funds. These terms and conditions will also apply to subrecipients. In the terms and conditions, there are detailed requirements on allowable and unallowable activities that align with the requirements for the period of performance. As mentioned above, there will also be reporting requirements that enable EPA to continue to monitor and track activities of the grantees and the success of projects funded—even after the period of performance for each grant is over.

13. How will the EPA make sure that organizations receiving funding through the program, either directly or as subrecipients, comply with all applicable federal and state laws and regulations governing consumer protections and institutions that lend money or offer financial services to individuals?

EPA RESPONSE: In addition to holding recipients accountable to implementing the consumer protection plans they submitted as part of the application packages, EPA has worked with consumer protection experts to develop specific requirements on consumer protection that recipients will be legally obligated to meet through the terms and conditions of their grants. These requirements will also flow-down to

subrecipients, in accordance with 2 CFR 200.332 *Requirements for pass-through entities*.

EPA is also training Project Officers on consumer financial protection so they are fully equipped to enforce these terms and conditions of the award agreements with the recipients.

14. In your written testimony, you noted that people from other agencies reviewed and scored applications for Greenhouse Gas Reduction Fund programs. I understand that the EPA likely coordinated and consulted with the White House and officials and staff within when designing the program. But did the EPA consult with the White House or any officials or staff within it regarding specific applications? This includes both current White House staff, or staff that were employed by the White House when you consulted them but are no longer there. If so, who, and what was each person's role in the process, or their involvement?

EPA RESPONSE: No one at the White House was involved in the evaluation and selection of these applications.

The Honorable Dan Crenshaw

1. Given the unprecedented size and nature of EPA's Greenhouse Gas Reduction Fund, how will the EPA verify the information that it receives from the grantees and subgrantees of the program?

EPA RESPONSE: EPA is implementing extensive reporting requirements that will require recipients to disclose their use of grant funds, their organizational financial statements, their organizational governance, and more to facilitate ongoing compliance with the terms and conditions of the award agreements. We have brought on a team of experienced project officers to closely oversee and monitor recipients.

2. To what extent do the EPA's compliance and oversight mechanisms rely on information submitted by grantees and sub-recipients?

EPA RESPONSE: EPA is implementing extensive reporting requirements that will require recipients to disclose their use of grant funds, their organizational financial statements, their organizational governance, and more to facilitate ongoing compliance with the terms and conditions of the award agreements. We have brought on a team of experienced project officers to closely oversee and monitor recipients. Finally, recipients—and, in many cases, subrecipients—will be subject to the Single Audit Act as implemented in 2 C.F.R. Part 200, Subpart F. The Single Audit Act is currently triggered when a non-federal entity expends more than \$750,000 of federal funding during its fiscal year. Specifically, an independent Single Audit reviews a program's financial statements; internal controls; and compliance with federal regulations, statutes, and the terms and conditions of the grant agreement, per 2 C.F.R. § 200.514. Results of Single Audits are publicly available through the Federal Audit Clearinghouse at <https://www.fac.gov/>.

3. What experience does the EPA have in evaluating grantees regarding their ability to give out loans or evaluate projects?

EPA RESPONSE: EPA has extensive experience in lending and project evaluation. For example, EPA runs the Clean Water State Revolving Fund (CWSRF), wherein state CWSRF programs use federal and state funds to provide loans for eligible projects. CWSRFs have provided \$163 billion to communities through 2022; forms of financial assistance include loans, purchase of debt or refinance, guarantees and insurance, loan guarantees, and more. Other EPA programs with deep lending and project evaluation experience include the Drinking Water State Revolving Fund, Water Infrastructure Finance and Innovation Act (WIFIA), and Brownfields Revolving Loan Fund. Experts with experience in lending and project evaluation from these programs were integral to the review and selection process for the Greenhouse Gas Reduction Fund grants.

4. How will the EPA monitor whether grantees are making sound investments of federal funds? Will the EPA monitor the repayment of loans made by grantees or subrecipients? Will the EPA monitor the status of projects funded with these taxpayer dollars?

EPA RESPONSE: EPA is implementing extensive reporting requirements that will require recipients to disclose their use of grant funds, their organizational financial statements, their organizational governance, and more to facilitate ongoing compliance with the terms and conditions of the award agreements. Reporting requirements will also include project-level and transaction-level reporting and performance metrics that will enable EPA to monitor the status of projects funded with GGRF dollars. We also will receive quarterly narrative reports from grantees that will include the amounts of loan repayments. We are reinforcing remedies for non-compliance, as authorized by 2 CFR 200.339, in the terms and conditions of the award agreements. We are also bringing on a team of experienced project officers to closely oversee and monitor recipients.

5. Does the EPA place any restrictions on how grantees can use any repayments and revenue once the period of performance ends? Are there any restrictions on their activities after the performance period ends, as a condition of receiving so much government funding?

EPA RESPONSE: After the period of performance for each grant is complete, the recipient will still be held accountable to detailed terms and conditions on the use of program income through close out agreements authorized by 2 CFR 1500.8(d). These terms and conditions will also apply to subrecipients. In the terms and conditions, there are detailed requirements on allowable and unallowable activities that align with the requirements for the period of performance. As mentioned above, there will also be reporting requirements that enable EPA to continue to monitor and track activities of the grantees and the success of projects funded—even after the period of performance for each grant is complete.

6. Back in March of last year the EPA's Inspector General testified in front of the Energy and Commerce Committee and raised concerns that newly created programs that provide funding to new grantees creates an increased risk of fraud and abuse. Has the EPA discussed the program with the Inspector General? If so, what changes were made to the program as a result?

EPA RESPONSE: The Office of Inspector General is one of several layers of oversight at EPA that ensure program integrity, including oversight by the grant project officer, oversight by EPA's Office of Grants and Debarment, and oversight by EPA's Office of the Chief Financial Officer. Senior Agency leadership met with the Office of Inspector General on June 7, 2023, to discuss financial and performance reporting, identify vulnerabilities and payment integrity risks. As a result of the meeting, the Office of Greenhouse Gas Reduction Fund developed a risk assessment that was shared with the Office of the Chief Financial Officer. In the President's FY 2025 Budget, EPA requested an increase of \$22 million for our Inspector General's office, which includes funding for their work on the Greenhouse Gas Reduction Fund.

7. There are concerns that the EPA will be giving taxpayer money to groups where employees may have a conflict of interest, are politically aligned or have previous ties to the Biden Administration. What protocols are in place to safeguard against the EPA from awarding funds to grantees that have ties to current officials at the EPA? How do the EPA's conflicts of interest policies address this situation?

EPA RESPONSE: The GGRF evaluation and selection process was conducted in line with the high standards of the Federal ethics rules and the EPA Competition Policy, which ensures the fair and impartial treatment of all applicants to the GGRF competitions. The entire evaluation and selection process was conducted in line with the publicly disclosed evaluation criteria, and every individual involved in evaluating and scoring applications was screened for conflicts of interest by EPA Ethics officials. That screening included a financial review to ensure that reviewers did not have any financial conflicts of interest as defined under the federal criminal conflict of interest statute. The screening also protected against any loss of impartiality under federal ethics rules (e.g., family, business relationships, recent prior employment). Additionally, as an added precaution, all individuals reviewing GGRF applications signed certifications—backed up with potential penalties under the False Claims Act and Program Fraud Civil Remedies Act—attesting that they have no conflict of interest.

8. In written testimony provided by Mr. Zealan Hoover, he noted that people from other agencies reviewed and scored applications for Greenhouse Gas Reduction Fund programs. Did the EPA consult with any current or previous White House staff or any officials regarding specific applications? If so, who, and what was each person's role in the process, or their involvement?

EPA RESPONSE: No one at the White House was involved in the evaluation and selection of the GGRF applications.

9. Several of the coalitions that applied for the National Clean Investment Fund were created specifically to apply for this funding and lack a track record of managing this amount of taxpayer funds. Does the EPA have concerns about granting large sums of money to organizations that have no experience in administering such funds?

EPA RESPONSE: The selected applicants to the National Clean Investment Fund all have a deep track record of managing this amount of funding. Each of the selected applicants are being provided award amounts that are significantly less than the amount of private funds that they and their partners have historically managed. Given their track record managing tens to hundreds of billions of private funds, EPA is confident that the coalitions of selected applicants will effectively and efficiently manage these public funds, and the Agency has put in place strong oversight controls.

10. One component of the Greenhouse Gas Reduction Fund is the “Solar for All” grant program. Part of the requirement for projects under this grant is the “Build American Buy America” sourcing requirements. How does the EPA plan to verify Build American Buy American compliance by grantees and subrecipients? Has the EPA consulted with any other agencies in developing a strategy for implementing these requirements?

EPA RESPONSE: A major focus of the Inflation Reduction Act is setting the United States up to win the clean energy, 21st century economy and the jobs that come with it. We share your concern about ensuring that this program strengthens our economic competitiveness. We have two major tools to address this priority: First, all infrastructure projects funded through these grants are subject to Build America, Buy America provisions. EPA has extensive expertise in applying domestic content preferences through our Office of Water and we have been drawing on this internal expertise to inform this program. Second, we are including terms and conditions in the award agreements to reinforce that all grants are subject to Build America, Buy America by statute. Throughout the program design, Solar for All has worked extensively with the Department of Energy, leveraging experts in the Solar Energy Technologies Office.

11. Given China’s total dominance in the solar panel supply chain, can you guarantee that all solar panels financed by this fund will be independent of Chinese manufacturing and raw materials?

EPA RESPONSE: EPA will include a term and condition in all award agreements to protect against federal funds flowing to entities with certain connections to the People’s Republic of China.