

# Environmental Justice: Agency Actions to Implement Past Justice40 Initiative

GAO-25-107516

Q&amp;A Report to Congressional Addressees

September 9, 2025

## Why This Matters

In 2021, Executive Order (EO) 14008 directed federal agencies to take action to address the disproportionately high and adverse human health, environmental, climate-related, and other cumulative impacts on “disadvantaged communities.” Specifically, the executive order established the goal that 40 percent of the overall benefits of certain federal investments flow to such communities. Benefits could include, for example, improved health, lower home energy costs, or restored wetlands. The executive order referred to this all-of-government effort as the Justice40 Initiative. The initiative did not itself create programs or appropriate or allocate funding. In January 2025, EO 14008 was revoked, thereby terminating the Justice40 Initiative.

By November 2023, 19 agencies had identified 518 programs—referred to by the implementation guidance as “covered programs”—that made covered investments such as grants or loans to Tribes, states, individuals, organizations, and other entities. According to the Executive Office of the President’s 2024 Environmental Justice Scorecard, Congress appropriated approximately \$613 billion total for the programs for fiscal years 2022 through 2027, including supplemental appropriations such as those made by the Inflation Reduction Act of 2022 (IRA).

The IRA included a provision for us to support oversight of the distribution and use of funds appropriated under the IRA and whether the economic, social, and environmental impacts of those funds are equitable. We were also asked, prior to the initiative’s termination, to review implementation of the Justice40 Initiative. This report provides information on the actions that three of the agencies with the most covered programs had taken, as of December 2024, to implement the initiative and related efforts, such as data collection and stakeholder engagement, as well as steps they took to assess those actions. The three agencies we examined are the Environmental Protection Agency (EPA), the Department of the Interior, and the U.S. Department of Agriculture (USDA). This report also provides information on how the Office of Management and Budget (OMB) used the three agencies’ data on Justice40 implementation as of December 2024.

## Key Takeaways

- As of December 2024, EPA, Interior, and USDA had taken similar actions to implement the Justice40 Initiative. These actions included integrating related goals and strategies into agency plans, taking steps to address barriers underserved communities face in accessing federal programs, issuing internal guidance, and making program modifications. The agencies had also taken initial steps to assess the results of their actions, such as by making plans to collect and assess relevant data.
- The overall results of agency actions taken prior to the initiative’s termination in January 2025 are unknown. By December 2024, EPA, Interior, USDA, and

OMB had not publicly reported comprehensive program-level information on what benefits resulted from each program, how those benefits were measured, or what overall amount of funding or benefits was delivered to disadvantaged communities. Further, by December 2024, neither the three agencies nor OMB had reported any assessments of agency actions to implement the initiative.

- Implementing the initiative proved to be a complex and time-consuming endeavor. The agencies were directed to examine how hundreds of federal programs—with diverse goals, funding mechanisms, target populations, and statutory requirements—invest and measure the impacts of tens of billions of dollars. The agencies conducted outreach to a variety of entities—including Tribes, state and local governments, community groups, businesses, and the public—to inform these efforts. For some programs, EPA, Interior, and USDA then modified program guidance, requirements, and evaluation criteria to align with the Justice40 Initiative and took steps to reduce barriers underserved communities face in accessing federal programs.
- The three agencies faced a variety of challenges identifying and measuring benefits across programs that operate at various geographic and time scales—benefits that may be difficult to attribute or quantify and may take years to manifest.

## Background

As directed by EO 14008 (subsequently revoked), entities in the Executive Office of the President—including the Council on Environmental Quality (CEQ) and OMB—issued guidance and tools for agencies implementing the Justice40 Initiative.<sup>1</sup> These included interim implementation guidance issued in 2021 and two Environmental Justice Scorecards, released in 2023 and 2024, that reported on selected agency actions to advance the initiative.<sup>2</sup>

Federal agencies were tasked with implementing the initiative for their programs—including those established by the IRA and Infrastructure Investment and Jobs Act—that made investments in one of seven specified areas of investment (see fig. 1).

**Figure 1: Seven Investment Areas of the Justice40 Initiative**



Sources: Justice40 Interim Implementation Guidance; Soonthorn/stock.adobe.com (top left photo); Alpegor/stock.adobe.com (top center photo); Robert Herhold/stock.adobe.com (top right photo); Monkey Business/stock.adobe.com (bottom left photo); diegorayaces/stock.adobe.com (bottom center-left photo); AKGK Studio/stock.adobe.com (bottom center-right photo); Tryfonov/stock.adobe.com and National Aeronautics and Space Administration (bottom right photo). | GAO-25-107516

Programs formerly covered by the initiative range in scope. For instance, EPA's Drinking Water State Revolving Fund provides grants to Tribes, states, and territories to support various drinking water infrastructure projects. USDA's Direct Farm Operating Loans provide loans to farms for purposes such as purchasing

farm equipment or livestock and making building repairs. Appendix I provides a list of EPA's, Interior's, and USDA's covered programs as of November 2023.

Additionally, in November 2022, CEQ released a screening tool that identified 27,248 census tracts as "disadvantaged" for the purposes of the Justice40 Initiative, representing about one-third of the U.S. population across 50 states and territories.<sup>3</sup> The tool identified these communities on the basis of factors such as poverty, loss of agriculture or population, and proximity to hazardous waste sites. Federally recognized tribal entities, regardless of whether they have land, were also considered to be disadvantaged communities for the purposes of the Justice40 Initiative.<sup>4</sup>

#### **Terminology for Disadvantaged, Underserved, and Overburdened Communities**

Federal agencies, statutes, and executive orders use a variety of terms, such as underserved, overburdened, or economically distressed, to describe communities that may align or overlap with those identified as disadvantaged communities under the Justice40 Initiative.

For example, the Agricultural Improvement Act of 2018 directed certain USDA programs to prioritize historically underserved producers—socially disadvantaged, beginning, limited resource, and Veteran farmers and ranchers. The Infrastructure Investment and Jobs Act and the IRA directed agencies to prioritize or direct funding to low-income or underserved communities for certain programs, but the acts do not define such terms in all contexts.

In this report, we use the term "disadvantaged communities" when referencing specific language in EO 14008 or related agency guidance and documents because those documents use that term. In instances not referring to specific provisions in those documents, we use the term "underserved communities" or the language used by the relevant agency in the context of specific efforts or programs.

Source: GAO analysis of agency materials, statutes, and executive orders. | GAO-25-107516

### **What direction had the Executive Office of the President given agencies as of December 2024 to implement the Justice40 Initiative?**

The Justice40 Initiative's 2021 interim implementation guidance directed agencies that managed covered programs to deliver to OMB a (1) description of the types of benefits that result from covered programs, such as the replacement of lead service lines, increased participation in job training programs, or improved flood mitigation; and (2) methodology for calculating the benefits, including metrics for measuring them.<sup>5</sup> The interim guidance stated that agencies should consult with tribal, state, and local governments as well as other stakeholders when determining these benefits.

The interim guidance also directed agencies to annually report certain information to OMB, such as the amount of funding and percentage of benefits directed to disadvantaged communities. To facilitate the collection of data, from 2021 to 2024, OMB issued five data requests asking agencies for various types of information on covered programs. For example, among other things, the first data request asked agencies to describe how each program's activities benefit (or could benefit) disadvantaged communities. The fifth and final request, in September 2024, asked agencies to report obligations made by each covered program that benefited (or were anticipated to benefit) disadvantaged communities.

Alongside the Justice40 Initiative, as of December 2024, other executive orders and legislation directed agencies to take actions related to their efforts to implement the Justice40 Initiative.<sup>6</sup> Such related efforts included assessing and addressing aspects of policies and processes that may pose barriers to underserved communities' access to federal programs, integrating equity efforts into strategic plans, conducting community engagement, and enhancing data identification and collection. The executive orders directing these efforts were revoked in January 2025.<sup>7</sup>

Further, as directed by several executive orders, beginning in 2021, agencies also participated in interagency efforts related to Justice40 implementation. As of

December 2024, these efforts included the Interagency Working Group on Equitable Data, the White House Environmental Justice Interagency Council, and the Environmental Justice Subcommittee of the National Science and Technology Council.<sup>8</sup> The executive orders directing these efforts were revoked in January 2025.<sup>9</sup>

### What actions had EPA taken as of December 2024 to implement the Justice40 Initiative?

As of December 2024, EPA had taken several actions to implement the Justice40 Initiative and related efforts, including integrating goals and strategies to implement the initiative and related efforts into its agency plans. In fall 2024, EPA officials we interviewed described the initiative as a methodology for identifying and allocating benefits for programs that complemented other administration policies.

In May 2025, EPA officials told us that, following the revocation of EO 14008 and related executive orders in January 2025, the agency terminated any associated evaluations or requirements, including the Justice40 Initiative.

#### Environmental Protection Agency's (EPA) Justice40-Covered Programs, as of December 2024

EPA identified 79 programs that were covered under the former Justice40 Initiative. The programs focused on issues ranging from air pollution to sewage treatment. EPA received approximately \$83.4 billion in total appropriations for these programs for fiscal years 2022 through 2027, according to the 2024 Environmental Justice Scorecard. The following are examples of programs that were covered under the initiative:

- The Nonpoint Source Program provides formula grants to Tribes, states, and territories to address pollution from sources such as urban and agricultural runoff, septic systems, and abandoned mine drainage. EPA awarded approximately \$178 million in grants in 2022, including \$4.2 million to Georgia for projects such as assisting cow and poultry farmers to control and prevent pollution.
- EPA's Clean School Bus Program offers rebates and competitive grants for tribal organizations, local and state governments, contractors, and other eligible entities to replace existing school buses with new, zero-emission and low-emission models. According to EPA officials, as of January 2025, EPA had obligated approximately \$2.7 billion to replace about 8,500 school buses in communities such as Jackson County, Tennessee, and Duluth, Minnesota.

Sources: 2024 Environmental Justice Scorecard and EPA. | GAO-25-107516

Note: According to the scorecard, total appropriations include both discretionary and mandatory appropriations, as well as supplemental appropriations, such as those in the Infrastructure Investment and Jobs Act. The data do not reflect the annual appropriations for fiscal year 2024 that Congress made in March 2024. The data represent the total funding provided for Justice40-covered programs, not only the portion that benefits disadvantaged communities.

**Integrated related goals and strategies into agency plans.** According to EPA officials we interviewed, from 2021 through 2024 the Justice40 Initiative was foundational to the agency's strategic plan, and it influenced the strategies and metrics in planning documents and program guidance across the agency.<sup>10</sup> For instance, as of December 2024, EPA's fiscal years 2022–2026 strategic plan stated that EPA would strive to exceed the Justice40 goal, including by prioritizing benefits to underserved communities in developing requests for grant applications and making grant award decisions, to the extent permitted by law.<sup>11</sup> To maximize benefits to underserved and overburdened communities, EPA planned to incorporate information on unequal community conditions into its decisions, and work to ensure meaningful community involvement.

EPA's 2022 and 2023 Equity Action Plans expanded on the strategic plan.<sup>12</sup> The documents outlined plans to improve access to federal funding and assistance programs for communities with environmental justice concerns through activities such as building related skills and knowledge in underserved communities and EPA officials' ability to engage with those communities. For each strategy to



advance equity that EPA outlined in the 2023 plan, the agency identified collaborating agencies, barriers to equity, the evidence base to support the strategy, proposed metrics, and planned public engagement efforts.

EPA engaged with a range of stakeholders to develop these plans. For example, EPA consulted with tribal governments, according to the strategic plan, and solicited public comments on a draft of the fiscal years 2022-2026 strategic plan via the *Federal Register*. The 2022 and 2023 Equity Action Plans report that they were informed by feedback from communities and stakeholders, including the public and Federal Advisory Councils, such as the National Environmental Justice Advisory Council.<sup>13</sup>

**Took steps to identify and reduce barriers.** As of December 2024, EPA had identified resource and capacity challenges that may pose barriers to communities accessing and benefiting from Justice40-covered programs. For example, EPA's 2023 Equity Action Plan reported that communities may lack the necessary data to compete for federal resources and may face challenges navigating the complex requirements for applying for and managing federal funding and resources. According to the plan, such barriers can impede community efforts to identify the appropriate and most needed forms of assistance, write compelling grant applications, form collaborative partnerships, and effectively implement and report on grant outcomes.

EPA took steps to reduce these barriers. For example, in its 2023 Equity Action Plan, EPA made plans to improve the agency's ability to collect and analyze data to better understand, identify, and remove barriers faced by communities with environmental justice concerns. As of December 2024, EPA had selected 18 Environmental Justice Thriving Communities Technical Assistance Centers across the country to provide capacity-constrained communities with free technical assistance on grant proposal writing, grant management, and effective implementation of projects.<sup>14</sup>

EPA also took actions to increase community participation in decision-making about covered programs. For example, in August 2024, to help officials build skills for public participation, EPA updated a guide for meaningful engagement, including best practices and steps for tailoring public participation processes to meet different program or decision contexts.<sup>15</sup> In addition, in its fiscal years 2022–2026 strategic plan, EPA set a goal that all EPA programs that seek public input provide resources to communities with environmental justice concerns to increase their ability to meaningfully engage with agency programs.

**Issued internal guidance.** According to EPA officials, the Office of Environmental Justice and External Civil Rights, EPA's Chief Financial Officer, and several other EPA administrative offices issued guidance documents for EPA offices on the implementation of the Justice40 Initiative and related efforts.

For example, the EPA Administrator directed offices to consider and prioritize direct and indirect benefits to underserved communities when developing requests for grant applications and making grant award decisions, to the extent allowed by law.<sup>16</sup> In addition, according to EPA officials we interviewed, the Office of the Chief Financial Officer directed EPA offices to begin tracking Justice40 benefits and outputs where feasible. Figure 2 shows examples of EPA programs under the former Justice40 Initiative.

**Figure 2: Examples of Environmental Protection Agency (EPA) Programs Under the Former Justice40 Initiative**



Stormwater runoff contaminated with pollutants contributes to the decline of salmon in Puget Sound. EPA's Nonpoint Source Program provides grants to states to address such pollution.



The Diesel Emissions Reduction Act Program funds grants and rebates to reduce emissions from diesel engines.

Sources: GAO (left image); lesterman/stock.adobe.com (right image) | GAO-25-107516

**Made program modifications.** As of December 2024, EPA had modified some programs to align with the Justice40 Initiative and incorporated mechanisms related to meeting the goal into some new programs, such as those established by the IRA. Examples of modifications as of December 2024 include the following:

- In its 2024 Nonpoint Source (Program guidelines for states and territories, EPA expanded options for how states and territories can use funds to support watershed planning and capacity building in disadvantaged communities to improve water quality.<sup>17</sup>
- In 2022, EPA issued guidance directing the 28 National Estuary Programs receiving funding through the Infrastructure Investment and Jobs Act to create an equity strategy describing how the funds would be used to increase investments in disadvantaged communities and the benefits that flow to them, as well as how those benefits would be tracked.<sup>18</sup>
- EPA established two tracks for 2023 and 2024 applicants to the Solid Waste Infrastructure for Recycling Grant Program for Political Subdivisions of States and Territories: one for projects that would benefit disadvantaged communities and territories (which would receive approximately 40 percent of investments) and one for projects that would benefit all other communities.

While some program modifications were made specifically in response to the Justice40 Initiative, others were made in response to legislation or were part of efforts that predate the initiative, according to EPA officials. Some EPA programs that were covered by the Justice40 Initiative are already statutorily required to focus on underserved communities. For example, the Infrastructure Investment and Jobs Act mandates that states provide 49 percent of certain Drinking Water State Revolving Fund program grants and forgivable loans to state-defined disadvantaged communities.<sup>19</sup> Also, EPA's Emerging Contaminants in Small and Disadvantaged Communities Tribal Grant Program funds activities to address emerging contaminants in water systems serving federally recognized Tribes, which, as noted previously, were considered to be disadvantaged communities for the purposes of the Justice40 Initiative.

### **What steps had EPA taken to assess these actions as of December 2024?**

As of December 2024, EPA had taken initial steps to assess its actions to implement the Justice40 Initiative, such as making plans to collect relevant data. However, as of December 2024, EPA had not published the results of any assessments of its actions or relevant agencywide data, and overall outcomes related to the initiative were unknown when the Justice40 Initiative was terminated in January 2025.

**Took initial steps to collect evidence.** As of December 2024, EPA had taken initial steps to assess its covered programs' progress in implementing the Justice40 Initiative and related efforts. For example, EPA's 2023 Equity Action Plan called for addressing data gaps to better understand the effect of its programs and identify targeted actions to improve outcomes for communities with environmental justice concerns. EPA developed a set of indicators—including the prevalence of childhood asthma and life expectancy—to illustrate the relationship between health outcomes and the work of EPA programs, among other things.

In addition, officials told us that EPA collected information on Justice40 implementation in response to OMB's data requests. For example, in late 2024, EPA was compiling data on the amount each program obligated to disadvantaged communities, according to officials. However, because EPA did not provide program-level data for us to review before the initiative was terminated in January 2025, we were unable to confirm what information EPA collected related to the Justice40 Initiative.

**Reported information on some covered programs.** Through documents such as the Environmental Justice Scorecards and Equity Action Plans, as of December 2024 EPA had reported anecdotally on agency and covered-program actions to implement the Justice40 Initiative.

For selected covered programs, EPA also reported the amount or percentage of funding that was allocated to disadvantaged communities. For example, EPA announced in an April 2024 press release that it had awarded \$7 billion in grants to Tribal governments, states, territories, municipalities, and nonprofits to deliver residential solar to low-income and disadvantaged communities through the Solar for All program. In its Investing in America Report, EPA estimated that over 60 percent of funding obligated from all programs funded by the IRA and Infrastructure Investment and Jobs Act through December 2024 had benefited disadvantaged communities as defined by EPA programs.<sup>20</sup> For instance, the report stated that the Gulf Hypoxia Program, which provides funds to improve water quality in the Gulf and the Mississippi River/Atchafalaya River Basin, had awarded more than \$15 million through December 2024 to fund projects that prioritized and engaged disadvantaged communities, as reported by grantees.

**Overall results of agency actions are unknown.** As of December 2024, EPA had reviewed the results of some covered-program efforts. For example, the Clean Water Act, as amended, generally requires EPA to annually review each state's Clean Water State Revolving Fund. Among other things, EPA uses the reviews to determine the extent to which states are assisting disadvantaged communities in accessing funding, according to EPA documents.<sup>21</sup>

In addition, EPA's 2024 annual fiscal year performance report described the extent to which the agency met some Justice40 Initiative-related goals in EPA's strategic plan. For example, the 2024 report found that the agency had missed its target for the percentage of programs and offices that provided capacity-building resources to communities with environmental justice concerns due to delays in hiring relevant staff.<sup>22</sup>

In October 2024, EPA officials we interviewed said that covered programs were either meeting or exceeding expectations related to OMB's data requests. However, the overall results of EPA's actions to implement the initiative are unknown. As of December 2024, EPA had not published comprehensive program-level data on the types of benefits that resulted from each program, methodologies or metrics for measuring those benefits, or the amount of funding or benefits delivered to disadvantaged communities. Further, EPA had not reported on any assessments of its actions to implement the initiative.

EPA officials described several challenges to assessing the results of agency actions. For example, according to the 2023 Equity Action Plan, one barrier to improving equity was a lack of clarity or guidelines on how to assess progress over time. In addition, according to EPA officials we interviewed, in fall 2024, covered programs had not finalized benefit calculation methodologies as directed by the interim guidance because they were waiting for OMB feedback on the draft methodologies EPA had submitted in 2021.

In addition, EPA officials told us that in some cases it was challenging to isolate the influence of program funding on specific outcomes, such as improvements in water quality, given the number of programs working to address the same problems. Further, they said in some cases it was difficult to identify the geographic location of the ultimate beneficiaries of EPA funds, such as when funds are awarded in one location while the benefits are experienced in another location. Additionally, an EPA Inspector General report found that the Justice40 Initiative required covered programs to report the percentage of benefits going to disadvantaged communities long before the work would be completed.<sup>23</sup>

### What actions had Interior taken as of December 2024 to implement the Justice40 Initiative?

As of December 2024, Interior had taken several actions to implement the Justice40 Initiative and related efforts. These included taking steps to identify and reduce barriers underserved communities face in accessing federal programs. Interior officials told us that the initiative was heavily considered in investment decisions that affect environmental justice communities and that they also considered the initiative in decision-making about broader policy and noninvestment related activities.

In May 2025, Interior officials told us that the department was no longer taking actions related to the Justice40 Initiative or environmental justice.

#### Department of the Interior's Justice40-Covered Programs, as of December 2024

Interior identified 75 programs that were covered under the former Justice40 Initiative. The programs focused on issues ranging from wildfire resilience to fish hatcheries. Approximately \$33 billion in total was appropriated for these programs for fiscal years 2022 through 2027, according to the 2024 Environmental Justice Scorecard. The following are examples of programs that were covered under the initiative:

- The WaterSMART program awards competitive grants to Tribes, western states, and local entities for water infrastructure and management projects. In 2024, the program awarded more than \$729 million for 252 projects, including the construction of a new headgate and diversion structure along the Castle Rock Canal in Nebraska.
- The Abandoned Mine Land Economic Revitalization Program allocates funds to Tribes and states for projects that reclaim abandoned mine lands through economic and community development. In 2024, the program allocated nearly \$130 million to three Tribes and six states. For example, the program funded the development of abandoned mine land in Helena, Alabama, for commercial, residential, and recreation uses.
- The Land and Water Conservation Fund State Assistance Program allocates funding to states and territories for outdoor recreation projects and competitive grants to urban communities to create and reinvigorate public parks and outdoor spaces. In fiscal year 2024, Interior announced over \$700 million in allocations and grants for projects such as the Zacate Creek Green District Corridor in the City of Laredo, Texas, including creating biking trails, a visitor's center, and other amenities.

Sources: 2024 Environmental Justice Scorecard and Interior. | GAO-25-107516

Note: According to the scorecard, total appropriations include both discretionary and mandatory appropriations, as well as supplemental appropriations, such as those in the Infrastructure Investment and Jobs Act. The data do not reflect the annual appropriations for fiscal year 2024 that Congress made in March 2024. The data represent the total funding provided for Justice40-covered programs, not only the portion that benefits disadvantaged communities.

**Integrated related goals and strategies into agency plans.** As of December 2024, Interior had incorporated Justice40-related goals and strategies into its



fiscal years 2022–2026 strategic plan, annual performance plans, 2022 and 2023 Equity Action Plans, and an environmental justice strategic plan.<sup>24</sup> According to Interior officials we interviewed, the plans were complementary, with each discussing unique elements, issues, and goals related to the Justice40 Initiative.

The plans outlined goals and strategies to advance equity, remove barriers to accessing department programs, and deliver resources and benefits to underserved communities. For example, Interior’s strategic plan targeted meeting the Justice40 goal and ensuring that people from historically underserved communities have equitable access to Interior education and research opportunities and benefit equitably from department decisions, investments, and opportunities.

Interior’s 2023 Equity Action Plan described plans to train department officials to work more effectively with underserved communities and modify programs to prioritize delivering benefits to those communities.<sup>25</sup> Interior identified barriers to implementing each equity strategy, evidence to support the strategy, planned actions, proposed output and outcome metrics, and planned public engagement efforts.

Interior engaged with Tribes and a range of stakeholders to develop these plans. For example, according to an Interior press release, the department hosted listening sessions attended by 1,700 stakeholders across the country prior to issuing the 2022 Equity Action Plan. Interior sought public input on its Strategic Plan to Advance Environmental Justice through written comments and listening sessions with the public, as well as through focus groups and a survey of Interior officials.

**Took steps to identify and reduce barriers.** To identify barriers that make it difficult for underserved communities to engage with the federal grant process and access funds from Justice40-covered programs, as of December 2024 Interior had collected information from a range of sources. For example, Interior conducted 15 listening sessions with the public and certain communities, such as Native Hawaiian Organizations, and collected public comments and recommendations via a *Federal Register* notice.

On the basis of this feedback, in its 2022 and 2023 Equity Action Plans, Interior reported on barriers. These included a lack of actionable data on equity barriers; lack of expertise or capacity of disadvantaged communities to engage with and navigate the federal government’s complex grant-making processes; an organizational structure at Interior that can make it difficult for groups and organizations to identify and access diverse funding opportunities; and limited community awareness of covered programs.

Interior took steps to reduce barriers. For example, the department hosted webinars in 2024 on accessing federal environmental justice resources, including sessions on writing grants and using the services of the Environmental Justice Thriving Communities Technical Assistance Centers. In addition, in 2022, Interior issued updated policies and procedures for consultation with American Indian and Alaska Native Tribes.<sup>26</sup>

In its 2023 Equity Action Plan, Interior described plans to develop training and tools to improve officials’ ability to work with underserved communities.<sup>27</sup> Interior’s fiscal years 2022–2026 Learning Agenda—which describes how Interior plans to gather evidence to inform decision-making—outlined plans to conduct a statistical analysis of the grant award and management process to determine which steps demonstrate a significant disparity for underrepresented groups.<sup>28</sup>

**Issued internal guidance.** Interior officials we interviewed told us that to facilitate Justice40 implementation, senior department executives issued memorandums to bureaus and offices about connecting the environmental

justice, finance, and grant-making communities within Interior. The memorandums also directed bureaus and offices to provide Interior's Office of Environmental Policy and Compliance with a benefits methodology, benefit metrics, and the portion of benefits that accrue in disadvantaged communities for each covered program, as well as a stakeholder engagement plan. Interior officials told us that senior executives also held informal discussions and office hours with bureau and program officials to discuss their implementation of the Justice40 Initiative. Figure 3 shows examples of Interior programs under the former Justice40 Initiative.

**Figure 3: Examples of Department of the Interior Programs Under the Former Justice40 Initiative**



Funded by the U.S. Fish and Wildlife Service's Tribal Wildlife Grant program, Skokomish Tribal Members work to safely capture, collar, and release elk in Washington State.



Interior's Land and Water Conservation Fund awards grants to support outdoor recreation and the improvement of existing parks and facilities.

Sources: : U.S. Fish and Wildlife Service (left image); jamesteoart/stock.adobe.com (right image). | GAO-25-107516

In addition, Interior's Bureau of Land Management issued guidance for bureau officials in September 2022 that updated and formalized best practices for environmental justice implementation, according to the 2023 Equity Action Plan. The practices were meant to guide staff in implementing the Justice40 Initiative and serve as an example for other bureaus to develop similar policies.

**Made program modifications.** In its 2023 Equity Action Plan, Interior stated that modifying the way existing programs are implemented to emphasize the importance of delivering benefits to underserved communities and designing new programs with a focus on equity would ensure that a greater portion of funds flow to those communities. As of December 2024, Interior had adjusted some programs to align with the Justice40 Initiative and incorporated mechanisms related to meeting the goal into some new programs, such as those established by the Infrastructure Investment and Jobs Act. Examples of modifications as of December 2024 include the following:

- Interior revised the Land and Water Conservation Fund State Assistance Program Manual to require states' priority rating systems to recognize the need for accessibility of proposed projects to all segments of the public, including various underserved populations. In addition, the manual stated that Interior would review state project selection processes against the requirements of EO 14008 and subsequent guidance.<sup>29</sup>
- For formula-based grants from the State Orphaned Wells Program established by the Infrastructure Investment and Jobs Act, Interior required states to describe how they would prioritize the remediation of orphaned wells on the basis of, among other things, land use priorities including the remediation of hazardous sites in disadvantaged communities.
- For fiscal years 2024 and 2025 applicants, Interior revised its evaluation criteria for WaterSMART's Water and Energy Efficiency Grants, awarding up to 15 points (out of 100) for projects advancing the Justice40 Initiative by serving or benefiting a disadvantaged community.

Some of Interior's covered programs provide funds specifically to Tribes, which, as noted previously, were considered disadvantaged communities for the purposes of the Justice40 Initiative. Such programs include the Tribal Electrification Program; Indian Education Facility Operations and Maintenance Program; and Kapapahuliau Climate Resilience Program for Native Hawaiians.

---

**What steps had Interior taken to assess these actions as of December 2024?**

As of December 2024, Interior had taken initial steps to assess its actions to implement the Justice40 Initiative, such as identifying gaps in data collection. However, as of December 2024, Interior had not published the results of any assessments of its actions or relevant department-wide data, and overall outcomes related to the initiative were unknown when the Justice40 Initiative was terminated in January 2025.

**Took initial steps to collect evidence.** In its 2022 and 2023 Equity Action Plans, Interior detailed several gaps in data collection and management that limited its ability to understand the impacts of its covered-program investments. The department took preliminary steps to address these gaps and assess its actions to implement the Justice40 Initiative and related efforts. For example, Interior's Strategic Plan to Address Environmental Justice and its 2023 Equity Action Plan identified several metrics to track progress on these efforts. These included the percentage of benefits going to disadvantaged and underserved communities and the number of technical assistance engagements that target underserved communities.

Officials told us that they responded to all of OMB's data requests and that the requests, issued from 2021 to 2024, were a motivating factor in the department's implementation of the Justice40 Initiative. OMB's data requests determined what information Interior tracked about the department's implementation of the initiative, according to officials. However, because Interior did not provide program-level data for us to review before the initiative was terminated in January 2025, we were unable to confirm what information the department collected related to the Justice40 Initiative.

**Reported information on some covered programs.** As of December 2024, Interior had reported anecdotally on actions some covered programs took or planned to take to implement the Justice40 Initiative in materials such as the scorecards and Equity Action Plans.

For some covered programs, Interior also reported the extent to which the programs provided funding to underserved communities. For example, in 2022, Interior reported in a press release that the Tribal Climate Resilience Program provided \$46 million to tribal communities for climate change initiatives, including internships and youth engagement, community driven relocation, and coastal management. Interior's 2024 annual report to Congress on its Orphaned Wells Program stated that approximately 40 percent of the 9,636 wells plugged by states and federal partners through fiscal year 2024 were located in disadvantaged communities.

**Overall results of agency actions are unknown.** As of December 2024, Interior had reviewed the results of some efforts to implement the Justice40 Initiative. Interior's fiscal years 2024-2025 Annual Performance Plan and 2023 Report described department progress toward meeting some Justice40-related strategic objectives set in the fiscal years 2022-2026 strategic plan. For example, the report found that general progress toward the department's strategic objective of ensuring equitable and just access to Interior's opportunities, services, and resources was hampered by slower than expected headway in identifying and eliminating barriers to participation in the department's funding opportunities.<sup>30</sup>

Interior's Fiscal Years 2024-2025 Annual Performance Plan and 2023 Report described plans to address this challenge, including by conducting a covered-program pilot evaluation to assess what was working with Justice40 implementation, what could be modified to remove barriers, and what stakeholder perspectives were. In addition, in its 2023 Equity Action Plan, Interior outlined plans to conduct a geographic impact analysis to understand how various department efforts cumulatively impact a region.

According to officials we interviewed, Interior was using the information it compiled for OMB to track Justice40 implementation. However, as of December 2024, Interior had not published comprehensive program-level data on the types of benefits that result from each program, methodologies and metrics for measuring those benefits, or the amount of funding or benefits delivered to disadvantaged communities. In addition, Interior had not reported on any assessments of its actions to implement the initiative.

Responding to OMB's data requests was challenging, according to Interior officials we interviewed. For example, Interior officials reported that it was challenging to collect relevant information from environmental justice communities because those communities did not have the resources needed to generate relevant information. Interior worked to address this challenge by connecting disadvantaged communities with appropriate resources, as well as connecting environmental justice and budget officials within Interior, according to officials.

Interior officials told us that it is challenging to measure outcomes, such as benefits received in communities. According to department officials, as of fall 2024, Interior was in the process of moving iteratively from measuring outputs, such as the amount of funding provided to communities, to measuring outcomes.

---

**What actions had USDA taken as of December 2024 to implement the Justice40 Initiative?**

As of December 2024, USDA had taken several actions to implement the Justice40 Initiative and related efforts, including making modifications to some programs. According to department officials, the initiative drove programmatic priorities for existing programs and acted as a reporting lens for program outcomes.

In May 2025, USDA officials told us that all equity initiatives and guidance, including the Justice40 Initiative, had been terminated and were no longer guiding USDA programs.



### U.S. Department of Agriculture's (USDA) Justice40-Covered Programs, as of December 2024

USDA identified 70 programs that were covered under the former Justice40 Initiative. The covered programs focused on a range of issues, from rural housing to the impacts of climate change on agriculture production. Approximately \$91 billion total was appropriated for these programs for fiscal years 2022 through 2027, according to the 2024 Environmental Justice Scorecard. The following are examples of programs that were covered under the initiative.

- The Regional Conservation Partnership Program partners with eligible organizations—such as Tribes, farmer cooperatives, and rural water districts—to provide technical and financial assistance to producers for implementing conservation activities on their lands. In fiscal year 2024, the program awarded \$1.5 billion to partners, including for the protection of at least 100,000 acres of working agricultural land near Colorado Springs, Colorado.
- The Rural Energy for America program provides grants and loans to agricultural producers and rural small businesses for the purchase and installation of renewable energy systems and energy efficiency improvements. The program issued approximately \$680 million in grants and loans in fiscal year 2024, including helping purchase solar panels for Nevada Bank and Trust in Mesquite, Nevada.
- The Community Facilities Direct Loans and Grants Program provides loans and grants to federally recognized Tribes, public bodies, and community-based nonprofit corporations to purchase, construct, or improve community facilities in rural areas such as hospitals, courthouses, and libraries. The program obligated more than \$1 billion for grants and loans in fiscal year 2023, including funds to purchase a law enforcement vehicle and a public works service truck in Dayton, Virginia.

Sources: 2024 Environmental Justice Scorecard, USDA, and Congressional Research Service. | GAO-25-107516

Note: According to the scorecard, total appropriations include both discretionary and mandatory appropriations, as well as supplemental appropriations, such as those in the Infrastructure Investment and Jobs Act. The data do not reflect the annual appropriations for fiscal year 2024 that Congress made in March 2024. The data represent the total funding provided for Justice40-covered programs, not only the portion that benefits disadvantaged communities.

**Integrated related goals and strategies into agency plans.** USDA integrated Justice40-related goals and strategies into its department-wide and agency-level planning documents. For example, USDA's fiscal years 2022–2026 strategic plan described plans for using data to better understand who benefits from USDA programs and services—awarding priority points for selecting projects that support engaging communities with better outreach and assessing barriers to communities' access to USDA programs.<sup>31</sup>

USDA's 2022 and 2023 Equity Action Plans described strategies for ensuring equitable access to department funding opportunities and investments. The plans called for providing tools and resources to underserved communities to increase access to such opportunities, such as by reducing administrative burdens and translating materials into multiple languages.<sup>32</sup> For each strategy, the 2023 plan included information on federal collaboration partners, barriers to achieving equity, evidence to support the strategy, planned actions, proposed metrics for measuring progress, and the way the department would engage with the public and communities on the strategy.

Additionally, each USDA agency developed an agency-level Equity Action Plan with agency-specific strategic goals. For example, the Farm Service Agency outlined plans to train employees in serving tribal and underserved customers and evaluating covered programs to ensure the agency reached the broadest audience.

USDA's planning documents were informed by a range of stakeholders. For example, USDA's strategic plan was informed and validated by listening sessions and discussions with Tribes; state and local governments; and stakeholders such

as producers, industry partners, and consumer groups. The 2023 Equity Action Plan stated that it was informed by stakeholder engagement, including public listening sessions, requests for public comments, tribal consultations, and the USDA Equity Commission.

**Took steps to identify and reduce barriers.** As of December 2024, USDA had taken steps to identify barriers for communities with environmental justice concerns in accessing program benefits, such as those from Justice40-covered programs. For example, USDA's 2024 Environmental Justice Strategic Plan outlined plans for routinely evaluating department policies, programs, and processes to identify barriers, including by developing criteria for identifying such barriers and reflecting on stakeholder feedback.<sup>33</sup> In addition, to further identify and address gaps in ensuring equitable access to USDA programs and services, the department conducted an internal review of 18 agencies' programs and actions.

In February 2022, under the American Rescue Plan Act of 2021, USDA established the USDA Equity Commission that evaluated USDA programs and policies and identified barriers to inclusion or access and systemic discrimination.<sup>34</sup> For example, the commission found that language can be a barrier for linguistically and culturally diverse communities trying to access USDA programs and services and that rural communities may not receive adequate information or technical assistance about USDA programs and funding opportunities. In 2024, the commission published its final recommendations for USDA and Congress to address these barriers.

USDA took steps to address barriers, some of which it described in its February 2024 progress report on addressing the Equity Commission's recommendations.<sup>35</sup> For example, in response to recommendations about technical assistance and outreach, among other things, USDA published a guide to help underserved farmers, ranchers, and forest landowners better understand and access programs and resources available to them.<sup>36</sup>

In addition, various USDA programs—such as the Rural Partners Network, the Rural Energy for America Technical Assistance Grant Program, and the American Rescue Plan Technical Assistance Investment Program—provide assistance to potential grantees and applicants in accessing USDA resources. One program, the 2501 Program, supports underserved farmers, ranchers, and foresters who have historically experienced limited access to USDA programs and services. In 2023, it awarded \$28 million to tribal entities, organizations, and higher education institutions to identify systemic barriers and expand access to USDA's programs.

USDA also planned further actions to reduce barriers to access and inclusion in its programs. For example, its 2023 Equity Action Plan outlined plans to identify statutory barriers to serving a broader set of producers and to reduce administrative, economic, historical, and other barriers to program access. Planned actions included expanding technical assistance to underserved farmers and increasing the availability of non-English resources. The plan also stated that USDA would implement these efforts transparently and accountably to Congress, stakeholders, and the public.

**Issued internal guidance.** In January 2022, USDA issued guidance directing agency officials to develop an implementation plan for each covered program. The implementation plans were to include specific program modifications that would direct increased program benefits to historically underserved communities and populations. In February 2023, further guidance directed officials to describe, among other things, indicators to track the flow of benefits to disadvantaged communities, timelines for modifying programs, and planned stakeholder

engagement. According to officials, the plans were used by agencies and programs to assess program aspirations; track and codify how programs should be or were being modified over time; and track how benefits accrued in disadvantaged communities. Figure 4 shows examples of USDA programs under the former Justice40 Initiative.

**Figure 4: Examples of U.S. Department of Agriculture (USDA) Programs Under the Former Justice40 Initiative**



USDA programs provide loans and grants for families and individuals to buy, build, repair, own, or rent affordable homes located in rural areas—such as this single-family home in Arizona.



USDA's Empowering Rural America and Powering Affordable Clean Energy Programs provide grants and loans for clean energy projects in rural communities.

Sources: GAO (left image); Kampan/stock.adobe.com (right image) | GAO-25-107516

**Made program modifications.** As of December 2024, USDA had modified some programs to align with the Justice40 Initiative and incorporated policies related to meeting the Justice40 goal into some new programs. Modifications included a variety of actions, ranging from publishing information about programs in multiple languages to including benefits to underserved communities as evaluation criteria for funding proposals. Examples of modifications as of December 2024 include the following:

- The Natural Resources Conservation Service and Forest Service modified the evaluation process of the Joint Chiefs' Landscape Restoration Partnership Program to include criteria weighing the benefits of the proposed project to underserved communities, according to USDA's Equity Commission progress report.
- In 2022, the Regional Conservation Partnership Program introduced a rating system for applicants that reflected, among other things, the extent to which the proposed project engaged and benefited historically underserved farmers and ranchers.

Some USDA programs that were covered under the Justice40 Initiative already provide funds specifically to underserved communities. For example, some National Institute of Food and Agriculture workforce development programs designate funding specifically for Native American/Tribal Serving Colleges and Universities. Other programs have statutory requirements that constrain USDA's ability to modify such programs to align with the goals of the Justice40 Initiative, according to USDA officials. For example, financial assistance through USDA's Agricultural Management Assistance program is only available in 16 states to producers for certain statutorily specified uses, which limits the amount of discretion USDA has regarding recipient selection.

## What steps had USDA taken to assess these actions as of December 2024?

As of December 2024, USDA had taken initial steps to assess its actions to implement the Justice40 Initiative, such as by tracking USDA's agencies' progress. However, as of December 2024, USDA had not published the results of any assessments of its actions or relevant department-wide data, and overall outcomes related to the initiative were unknown when the Justice40 Initiative was terminated in January 2025.

**Took initial steps to collect evidence.** As of December 2024, USDA had taken preliminary steps to assess the actions it took to implement the Justice40 Initiative, such as by identifying relevant data. For example, USDA's Urban and Community Forest Program entered into a cooperative agreement with a national partner to develop a baseline for measuring progress toward increasing national urban tree canopies.

In addition, USDA's fiscal years 2022–2026 strategic plan called for using data to understand who benefits from USDA programs and services and establishing key performance indicators documenting investments to distressed communities in alignment with Justice40 objectives. Further, USDA's 2023 Equity Action Plan included proposed metrics for measuring progress related to the Justice40 Initiative, including total investments in rural underserved communities and funding allocated to wildfire risk reduction projects in socially vulnerable and disadvantaged communities. In addition, covered programs' Justice40 implementation plans were to include indicators to track the flow of benefits to disadvantaged communities, according to department officials.

In 2024, USDA reported that the department had begun tracking progress on program Justice40 implementation plans using an internal tracking system. Further, according to USDA officials we interviewed, the department's Office of Budget and Program Analysis provided quarterly reports to the Secretary of Agriculture's office on programs' progress implementing the Justice40 Initiative while the initiative was in place. The Secretary used the reports to identify and address obstacles to implementation.

USDA collected data about its Justice40 efforts in response to OMB data requests, according to USDA officials. According to a department official, as of December 2024, covered programs were in the process of measuring the amount of funding the programs obligated to disadvantaged communities in 2022 and 2023 in response to OMB's September 2024 data request.

As of December 2024, USDA's Justice40-covered programs had not finalized methodologies and metrics for calculating benefits to disadvantaged communities and were unable to report the percentage of benefits directed to these communities, according to a USDA official. Because USDA did not provide program-level data for us to review before the initiative was terminated in January 2025, we were unable to confirm what information USDA had collected related to the Justice40 Initiative.

**Reported information on some covered programs.** As of December 2024, USDA had reported anecdotally on actions covered programs took or were planning to take to implement the Justice40 Initiative and related efforts in the Environmental Justice Scorecards, the 2023 Equity Action Plan, annual performance reports, and the department's progress report on addressing the Equity Commission's recommendations.

For some covered programs, USDA also reported the extent to which the programs provided funding to underserved communities. For example, in the 2024 Environmental Justice Scorecard, USDA reported that the Former Commodity Credit Corporation Grain Storage Hazardous Waste Cleanup Program allocated 55 percent of its total budget to perform remediation and reduction of legacy pollution from pesticides on private lands in disadvantaged communities in Kansas, Missouri, and Nebraska. USDA's fiscal year 2024 annual performance report stated that the Urban and Community Forestry Program awarded 701 IRA-funded grants to communities considered to be disadvantaged for the purposes of the Justice40 Initiative.<sup>37</sup> Through its public Rural Data Gateway, USDA reported the amount and percentage of rural development



financing that socially vulnerable counties received from 2012 to 2024 for projects such as community facilities and energy efficient housing.<sup>38</sup>

**Overall results of agency actions are unknown.** As of December 2024, USDA had reported on the department's progress meeting some Justice40-related strategic goals in its fiscal year 2024 annual performance report. For example, the department found that USDA had met its goal for the number of Urban and Community Forestry Program grants awarded to disadvantaged communities but missed its target for the percentage of rural development assistance directed to distressed communities, due to limited staffing and grant funding.

However, as of December 2024, the department had not published comprehensive program-level data on the types of benefits that had resulted from each program, methodologies and metrics for measuring those benefits, or the amount of funding or benefits delivered to disadvantaged communities. In addition, USDA had not reported on any assessments of its actions to implement the initiative.

USDA officials told us that tracking covered program benefits was an "aspirational concept" that was difficult to implement, particularly due to insufficient data. Benefits were also challenging to track, in part because there were so many variables to consider, according to USDA officials. In addition, some OMB data requests were at a scale that made it challenging for USDA programs to deliver the requested information by OMB's deadlines, according to USDA officials and OMB staff. For example, in 2023 USDA was only able to provide data for approximately 2,000 of more than 6,000 projects by OMB's deadline, according to USDA officials. USDA worked with CEQ and OMB to modify OMB's requests that the department believed were unrealistic.

---

### How had OMB used the data submitted by agencies as of December 2024?

As of December 2024, OMB had used data submitted by the agencies to report examples of agency actions to implement the Justice40 Initiative. However, OMB had not reported agency- or program-level metrics or assessed the results of agencies' actions by the time the initiative was terminated in January 2025.

**Reported examples of actions taken by agencies.** OMB reported examples of agency actions to implement the Justice40 Initiative in the Environmental Justice Scorecard based on the data agencies delivered in response to OMB's requests.

For example, as described above, the 2024 scorecard reported on program or design modifications agencies made to maximize benefits and remove barriers for disadvantaged communities. In the 2023 scorecard, OMB reported the number of covered programs managed by each agency and, in 2024, reported which of the seven investment areas the programs supported and what the total appropriations were for all covered programs at each agency.

However, as of December 2024, OMB had not comprehensively reported program-level data that it had requested from the agencies, such as the amount of funds directed to disadvantaged communities or to what extent programs had developed stakeholder engagement plans.

According to OMB staff and agency officials we interviewed, OMB faced challenges collecting data from agencies about Justice40 implementation, some of which are described above, such as challenges in measuring benefits and beneficiaries of agency investments. According to OMB staff, agencies told OMB that the amount and type of information OMB requested could be difficult to provide. For many agencies it was the first time they were asked to provide the types of information OMB was requesting, according to OMB staff. As a result, in response to feedback from agencies on its initial requests, OMB focused its later data requests on budget-related information, which agencies were better

positioned to report uniformly than benefits-related information, according to OMB staff.

**Did not assess the results of agency actions.** In October 2024, prior to the revoking of EO 14008, OMB stated that OMB’s responsibilities under the executive order included participating in continuous monitoring and assessment of agency performance with respect to the Justice40 goal. OMB also stated that personnel within the Executive Office of the President reviewed agency information to assess progress toward the goal and to inform federal policy deliberations. OMB staff we interviewed told us that the Environmental Justice Scorecard provided a baseline assessment of agency work that would allow for year-over-year comparisons to measure progress.

However, according to our review, the 2023 and 2024 scorecards did not include metrics for measuring agency or government-wide progress. Further, OMB staff told us that the purpose of the scorecard was to highlight progress made by agencies, rather than to identify areas where agencies could improve. This limited its usefulness for assessing implementation.

Moreover, according to our review of Executive Office of the President documents, including websites, reports, and press releases, as of December 2024, the Executive Office of the President had not assessed agency actions or established a process for assessing the federal government’s overall progress toward the Justice40 goal. Additionally, OMB had not publicly communicated information about plans or timelines for developing such a process.

In addition, according to our review of OMB materials, OMB did not publicly release sufficient information that would have allowed Congress, agencies, or the public to assess agency progress toward the Justice40 goal. Because OMB did not provide us with any program-level data before the termination of the initiative in January 2025, we were unable to conduct our own assessment of the data agencies delivered to OMB or agency progress toward the Justice40 goal.

---

## Agency Comments

We provided a draft of this report to OMB, EPA, Interior, and USDA for review and comment. EPA provided technical comments, which we incorporated, as appropriate. OMB, Interior, and USDA did not provide comments on the draft report.

---

## How GAO Did This Study

Because the Justice40 Initiative was terminated in January 2025 when EO 14008 was revoked, we reviewed actions taken by OMB, EPA, Interior, and USDA through December 2024.

We reviewed documents from and interviewed staff at OMB to understand OMB’s role and actions as of December 2024 in collecting and publishing agency information on Justice40 implementation and assessing agency actions.

In addition, we reviewed documents from and interviewed officials at EPA, Interior, and USDA to understand the actions each agency took as of December 2024 to implement the Justice40 Initiative and the steps they took to assess these actions. We selected EPA, Interior, and USDA for our review because they were the agencies, along with the Department of Energy, with the most covered programs reported in the list of programs issued by the Executive Office of the President in November 2023, the most recent list available at the time of our review. Because the National Academies of Sciences, Engineering, and Medicine was conducting a review of the Department of Energy’s Justice40 Initiative efforts, we excluded the department from our review to avoid duplicating efforts.<sup>39</sup>

Because OMB, EPA, Interior, and USDA did not provide program-level data for us to review before the initiative was terminated in January 2025, we were unable to confirm what information the agencies or OMB had collected related to the Justice40 Initiative or conduct our own analysis of those data.

We conducted this performance audit from April 2024 to September 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

## List of Addressees

The Honorable Rand Paul, M.D.  
Chairman  
The Honorable Gary C. Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable James Comer  
Chairman  
The Honorable Robert J. Garcia  
Ranking Member  
Committee on Oversight and Government Reform  
House of Representatives

The Honorable Jamie Raskin  
House of Representatives

We are sending copies of this report to the appropriate congressional committees, the Director of OMB, the EPA Administrator, the Secretaries of Agriculture and the Interior, and other interested parties. In addition, the report will be available at no charge on the GAO website at [www.gao.gov](http://www.gao.gov).

---

## GAO Contact Information

For more information, contact: J. Alfredo Gómez, Director, Natural Resources and Environment, [gomezj@gao.gov](mailto:gomezj@gao.gov).

Sarah Kaczmarek, Managing Director, Public Affairs, [KaczmarekS@gao.gov](mailto:KaczmarekS@gao.gov).

A. Nicole Clowers, Managing Director, Congressional Relations,  
[ClowersA@gao.gov](mailto:ClowersA@gao.gov).

**Staff Acknowledgments:** Chad M. Gorman (Assistant Director), Krista Mantsch (Analyst in Charge), T. Jackson Autry, John Delicath, Gina Hoover, Patricia Moye, M. Todd Perry, and Sara Sullivan.

Connect with GAO on [Facebook](#), [Flickr](#), [X](#), and [YouTube](#). Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).

Visit GAO on the web at <https://www.gao.gov>.

This work of the United States may include copyrighted material, details at <https://www.gao.gov/copyright>.

## Appendix I: EPA's, Interior's, and USDA's Covered Programs under the Former Justice40 Initiative

Covered programs under the Justice40 Initiative were federal government programs that made certain investment benefits in one or more of the seven investment areas specified in the 2021 interim implementation guidance for the Justice40 Initiative. These investment areas were clean energy and energy efficiency, clean transit, affordable and sustainable housing, training and workforce development, remediation and reduction of legacy pollution, the development of critical clean water and waste infrastructure, and climate change. The initiative did not itself create programs or appropriate or allocate funding.

The information below is based on the list of covered programs released by the Executive Office of the President in November 2023, the most recent list published prior to the termination of the Justice40 Initiative in January 2025. Agencies may use slightly different names for these programs than those listed here. The list may not include all programs that met the definition of a covered program at the time the initiative was terminated in January 2025.

### Environmental Protection Agency (EPA)

1. Alaska Native Villages
2. American Rescue Plan–Diesel Emissions Reduction Act rebate program
3. American Rescue Plan–Direct Awards to Air Agencies for Continuous Monitoring of PM2.5 and Other Common Air Pollutants
4. American Rescue Plan–Grant Competition for Community Monitoring
5. Brownfields Projects Program
6. Categorical Grant: Beaches Protection
7. Categorical Grant: Brownfields
8. Categorical Grant: Lead
9. Categorical Grant: Pesticides Program Implementation
10. Categorical Grant: Pollution Prevention
11. Categorical Grant: Tribal Air Quality Management
12. Categorical Grant: Wetlands Program Development Grant
13. Children and Other Sensitive Populations: Agency Coordination
14. Clean Heavy-Duty Vehicles
15. Clean Ports
16. Clean School Bus Program
17. Clean Water State Revolving Fund
18. Clean Water State Revolving Fund-Emerging Contaminants
19. Climate Pollution Reduction Grants
20. Compliance Advisor Program
21. Compliance Monitoring (On-Site Inspections)
22. Conflict Prevention and Resolution Center
23. Diesel Emissions Reduction Act Program
24. Drinking Water Infrastructure Resiliency and Sustainability Grant Program
25. Drinking Water State Revolving Fund Emerging Contaminants (including per- and polyfluoroalkyl substances (PFAS))
26. Drinking Water State Revolving Fund Lead Service Lines Replacement
27. Drinking Water State Revolving Fund
28. Environmental Education
29. Environmental and Climate Justice Community Change Grants and Technical Assistance
30. Environmental Justice Collaborative Problem-Solving Cooperative Agreement Program
31. Environmental Justice Government-to-Government Program
32. Environmental Justice Thriving Communities Grantmaking Program
33. Environmental Justice Thriving Community Technical Assistance Centers
34. Exchange Network Program



35. Facilities Infrastructure and Operations (Clean Energy and Energy Efficiency)  
Buildings and Facilities
36. Facilities Infrastructure and Operations (Climate)
37. Federal Support for Air Quality Management (American Indian Air Quality Training Program)
38. Funding to Address Air Pollution: Air Quality Sensors in Low-Income and Disadvantaged Communities
39. Funding to Address Air Pollution at Schools
40. Funding to Address Air Pollution: Fenceline Air Monitoring
41. Funding to Address Air Pollution: Methane Monitoring
42. Funding to Address Air Pollution: Multipollutant Monitoring
43. Greenhouse Gas Reduction Fund–Clean Communities Investment Accelerator
44. Greenhouse Gas Reduction Fund–National Clean Investment Fund
45. Greenhouse Gas Reduction Fund–Solar for All Program
46. Gulf Hypoxia Program
47. Lead Risk Reduction Program
48. Lead Testing in School and Child Care Grant Program
49. Leaking Underground Storage Tank/Underground Storage Tank
50. Low Emissions Electricity Program (Section 60107(a)(2))
51. Leaking Underground Storage Tank Cooperative Agreements
52. National Estuary Program
53. Nonpoint Source (Section 319) Grant Program
54. Office of Community Revitalization
55. Office of Water Geographic Programs
56. Oil Spill Prevention and Preparedness
57. Pesticides: Protect Human Health from Pesticide Risk
58. Pesticides: Realize the Value of Pesticide Availability
59. Pollution Prevention Program
60. Pollution Prevention Grants: Infrastructure Investment and Jobs Act Funded
61. Recycling Education and Outreach Grants
62. Reduce Risks from Indoor Air–Asthma
63. Reduction of Lead in Drinking Water Grant Program
64. Senior Environmental Program
65. Sewer Overflow Control Grants Program
66. Small and Disadvantaged Communities Drinking Water Grant Program
67. Small System Training and Technical Assistance Grant
68. Solid Waste Infrastructure for Recycling Grants
69. State and Local Prevention and Preparedness
70. Superfund Emergency Response and Removal
71. Superfund Remedial Program
72. Targeted Airshed Grants
73. Technical Assistance for Treatment Works Program
74. Toxics Release Inventory/ Community Right-to-Know Program
75. Tribal General Assistance Program
76. U.S.-Mexico Border Program
77. U.S.-Mexico Border Water Infrastructure Program
78. Water Infrastructure Finance and Innovation Act Program
79. Water Infrastructure Improvements for the Nation Small and Underserved Communities Emerging Contaminants Grant Program

## **Department of the Interior**

### *Bureau of Indian Affairs (BIA)*

1. BIA Owned Irrigation Projects and Power Utilities
2. Bison Program

3. Economic Development (Tribal Priority Allocation)
4. Environment and Cultural Resources
5. Forestry
6. Fish Hatcheries—Construction and Retrofits
7. Housing Improvement Program
8. Indian Water Rights Settlements
9. Invasive Species
10. Job Placement and Training
11. Missing and Murdered Indigenous Persons
12. Office of Trust Services—Operations of Indian Programs: Energy, Minerals and Mining Development
13. Outdoor Recreation Program
14. Resource Integration and Services
15. Safety of Dams
16. Tribal Climate Resilience
17. Tribal Electrification Program
18. Water Resources Management Planning and Predevelopment

*Bureau of Indian Education*

19. Education Information Technology
20. Employee Housing
21. Post-Secondary Programs
22. School Construction, Improvement and Repair
23. School Facility Operations and Maintenance
24. Student Transportation

*Bureau of Land Management*

25. Abandoned Mine Lands, Hazardous Materials Management
26. Conservation and Ecosystem Restoration
27. Conservation and Resilience
28. Land and Water Conservation Fund—Federal Land Acquisition
29. Seeds of Success: Native Seed Collection Program

*Bureau of Reclamation*

30. Authorized Rural Water Projects
31. Domestic Water Supply Projects
32. Native American Affairs Program
33. Other Water Infrastructure Activities
34. Tribal Water Rights Settlements
35. WaterSMART

*Bureau of Ocean Energy Management*

36. The Alaska Native Science and Engineering Program

*Bureau of Safety and Environmental Enforcement*

37. Offshore Orphaned Infrastructure Decommissioning
38. The Alaska Native Science and Engineering Program

*Fish and Wildlife Service*

39. Benefits to Private Lands—Coastal Program
40. Benefit to Private Lands—Partners Program
41. Fish Passage Improvements
42. Land and Water Conservation Fund—Federal Land Acquisition
43. Refuge System Resiliency
44. Tribal Wildlife Grants
45. Urban Wildlife Refuges
46. Youth Programs

### *National Park Service*

47. Conservation and Resilience
48. Conservation and Ecosystem Restoration
49. Environmental Compliance and Cleanup Division
50. Land and Water Conservation Fund–Federal Land Acquisition
51. Land and Water Conservation Fund–Outdoor Recreation Legacy Partnership Program
52. Land and Water Conservation Fund–Stateside Grants
53. Rivers, Trails, and Conservation Assistance
54. Youth Programs

### *Office of Surface Mining Reclamation and Enforcement*

55. Abandoned Mine Land Economic Revitalization
56. Abandoned Mine Land Program
57. Abandoned Mine Land Program (Infrastructure Investment and Jobs Act)

### *Office of Insular Affairs*

58. Brown Tree Snake Control
59. Capital Improvement Project Grants
60. Climate Change Technical Assistance for Territories
61. Coral Reef Initiative & Natural Resources
62. Energizing Insular Communities
63. Maintenance Assistance Fund
64. Technical Assistance Program

### *Department-wide*

65. Abandoned Hardrock Mine Reclamation
66. Burned Area Rehabilitation
67. Central Hazardous Materials Fund
68. Ecosystem Restoration
69. Emergency Stabilization
70. Fire Facilities
71. Fuels Management
72. Native Hawaiian Climate Resilience
73. Orphaned Wells Site Plugging, Remediation, and Restoration
74. Preparedness
75. Urban Waters

## **U.S. Department of Agriculture (USDA)**

### *Agricultural Research Service (ARS)*

1. ARS 1890 Faculty Research Program
2. ARS Outreach Activities Associated with Underserved/Underrepresented Populations
3. Clean Energy
4. Climate Change

### *Farm Service Agency (FSA)*

5. Agriculture Risk Coverage Program
6. Inflation Reduction Act of 2022 Section 22006 Assistance for Distressed Borrowers
7. Conservation Reserve Enhancement Program
8. Conservation Reserve Program
9. Dairy Margin Coverage
10. Direct Farm Operating Loans

11. Farm Storage Facility Loan
12. Former Commodity Credit Corporation Grain Storage Hazardous Waste Cleanup Program
13. FSA County Committees (Urban Agriculture Pilot Locations)
14. Grassland Conservation Reserve Program
15. Guaranteed Conservation Loans
16. Organic Certification Cost Share Program
17. Price Loss Coverage
18. Transition Incentives Program

*Forest Service*

19. Abandoned Hard Rock Mine Reclamation Program
20. Collaborative Aquatic Landscape Restoration Program
21. Collaborative Forest Landscape Restoration Program
22. Ecological Health Restoration Contracts
23. Financial Assistance to Facilities that Purchase and Process Byproducts for Ecosystem Restoration Projects
24. Forest Landowner Support
25. Hazardous Fuels Management and Reducing Wildfire Risk to Communities
26. Job Corps and Resource Assistants Program and Training
27. Joint Chiefs' Landscape Restoration Partnership
28. Land and Water Conservation Fund—Forest Legacy
29. Land and Water Conservation Fund—Land Acquisition Program
30. Orphaned Well Reclamation Program
31. Recreation Sites
32. Restoration Projects Via States and Tribes
33. Restore Native Vegetation on Federal/Non-Federal Land
34. Revegetation Effort to Implement National Seed Strategy
35. Tribal Authorities
36. Urban and Community Forestry Program
37. Vegetation and Watershed Management Projects

*National Institute of Food and Agriculture (NIFA)*

38. Bioproduct Research Program
39. NIFA Workforce Development, Climate Research, and Extension Programs Benefitting Underserved Communities

*Natural Resources Conservation Service*

40. Agricultural Conservation Easement Program
41. Agricultural Management Assistance
42. Conservation Operations/Conservation Technical Assistance
43. Conservation Stewardship Program
44. Environmental Quality Incentives Program
45. Healthy Forest Reserve Program
46. Joint Chiefs' Landscape Restoration Partnership
47. Regional Conservation Partnership Program
48. Urban Agriculture and Innovative Production
49. Watershed and Flood Prevention Operations
50. Watershed Rehabilitation Program

*Risk Management Agency*

51. Agricultural Management Assistance
52. Risk Management Education Partnership Program



### *Rural Business-Cooperative Service*

- 53. Rural Energy for America Grant Program
- 54. Rural Energy for America Loan Program

### *Rural Housing Service*

- 55. Community Facilities Direct Loans
- 56. Community Facilities Grants
- 57. Multi-Family Housing Section 521 Rental Assistance
- 58. Mutual and Self-Help Housing Grants
- 59. Single Family Housing Direct Loans

### *Rural Utilities Service*

- 60. Distributed Generation Energy Project Financing
- 61. Electric Infrastructure Program
- 62. Empowering Rural America (New ERA)
- 63. Energy Efficiency and Conservation Loan Program
- 64. Energy Resource Conservation Program
- 65. High Energy Cost Grant
- 66. Powering Affordable Clean Energy
- 67. Rural Energy Savings Program
- 68. Water and Waste Direct Loan
- 69. Water and Waste Grant

### *Department-wide*

- 70. USDA Climate Hubs

---

## Endnotes

<sup>1</sup>See Exec. Order No. 14,008, § 223, 86 Fed. Reg. 7619, 7631 (Feb. 1, 2021) (revoked by Exec. Order No. 14,148, § 2(s), 90 Fed. Reg. 8237, 8238 (Jan. 28, 2025)).

<sup>2</sup>Office of Management and Budget, Council on Environmental Quality, and Climate Policy Office, *Interim Implementation Guidance for the Justice40 Initiative*, M-21-28 (Washington, D.C.: July 20, 2021); Office of Management and Budget, Council on Environmental Quality, and U.S. Digital Service, *Environmental Justice Scorecard Phase 1*, accessed October 11, 2023; and *Environmental Justice Scorecard Phase 2*, accessed December 13, 2024.

For more information on the guidance and tools developed by the Executive Office of the President for implementing the Justice40 Initiative, see GAO, *Justice40: Use of Leading Practices Would Strengthen Efforts to Guide Environmental Justice Initiative*, [GAO-24-105869](#) (Washington, D.C.: Jan. 29, 2024).

<sup>3</sup>Council on Environmental Quality, *Climate and Economic Justice Screening Tool*, accessed November 17, 2023. For information on CEQ's uses of IRA appropriations, including related Justice40 tools, see GAO, *Inflation Reduction Act: Council on Environmental Quality's Uses and Oversight of Appropriations as of December 2024*, [GAO-25-107108](#) (Washington, D.C.: May 21, 2025).

<sup>4</sup>Office of Management and Budget, Council on Environmental Quality and Climate Policy Office, *Interim Implementation Guidance for the Justice40 Initiative*, M-21-28. This guidance had not been finalized when the initiative was terminated in January 2025. For additional information on the Climate and Economic Justice Screening Tool, see [GAO-24-105869](#). See also *Justice40: Additional Efforts Needed to Improve Tribal Applicants' Access to Federal Programs under Environmental Justice Initiative*, [GAO-24-106511](#) (Washington, D.C.: Apr. 10, 2024).

<sup>5</sup>Office of Management and Budget, Council on Environmental Quality, and Climate Policy Office, *Interim Implementation Guidance for the Justice40 Initiative*, M-21-28.

---

<sup>6</sup>See, e.g., Exec. Order No. 13,985, 86 Fed. Reg. 7010, 7011 (Jan. 20, 2021); Exec. Order No. 14,082, 87 Fed. Reg. 56,861 (Sept. 12, 2022); Exec. Order No. 14,091, 88 Fed. Reg. 10825 (Feb. 22, 2023); Exec. Order No. 14,096, 88 Fed. Reg. 25,251 (Apr. 26, 2023). As noted previously, the IRA and Infrastructure Investment and Jobs Act also directed agencies to take actions related to prioritizing or directing funding to low-income or underserved communities for certain programs.

<sup>7</sup>Exec. Order No. 14,148, § 2, 90 Fed. Reg. 8237, 8237 (Jan. 28, 2025) (revoking Executive Orders 13,985, 14,082, 14,092, and 14,096). See also Exec. Order No. 14,173, § 3(i), 90 Fed. Reg. 8633, 8634 (Jan. 31, 2025).

<sup>8</sup>The Interagency Working Group on Equitable Data released recommendations in April 2022 for advancing equitable data across the government by disaggregating and analyzing data to identify disparities in federal policies and programs, using levers of the federal government to address those disparities, and then enabling members of the public to hold government accountable. See Equitable Data Working Group, *A Vision for Equitable Data: Recommendations from the Equitable Data Working Group* (Washington, D.C.: April 2022).

In 2023, the National Science and Technology Council issued a report on selected agencies' progress implementing the recommendations of the Interagency Working Group on Equitable Data. See National Science and Technology Council, Subcommittee on Equitable Data, *Progress on Implementation of the Recommendations of the Equitable Data Working Group* (Washington, D.C.: March 2023).

The White House Environmental Justice Interagency Council, composed of the heads of 26 federal agencies and other federal entities, provided input to the Executive Office of the President on the development of the Justice40 Initiative interim guidance and scorecard and to CEQ on the development of the screening tool, among other activities.

The Environmental Justice Subcommittee of the National Science and Technology Council, composed of officials from across the executive branch, published high-level recommendations for identifying and addressing long-standing gaps; barriers; and missing science, data, and research relevant to environmental justice. See National Science and Technology Council, Environmental Justice Subcommittee, *Environmental Justice Science, Data, and Research Plan* (Washington, D.C.: July 2024).

<sup>9</sup>Exec. Order No. 14,148, § 2, 90 Fed. Reg. 8237, 8237 (Jan. 28, 2025) (revoking Executive Orders 13,985, 14,008, 14,082, and 14,096). See also Exec. Order No. 14,173, § 3(i), 90 Fed. Reg. 8633, 8634 (Jan. 31, 2025) (revoking Executive Order 12898); Exec. Order No. 14,154, § 4, 90 Fed. Reg. 8353, 8354 (Jan. 29, 2025) (revoking Executive Orders 14,008, 14,082, and 14,096).

<sup>10</sup>In May 2025, EPA officials told us that, following the revocation of EOs 13981, 14008, and 14096, the agency terminated its Environmental Justice Strategic Plan, Equity Action Plans, and any associated evaluations or requirements.

<sup>11</sup>Environmental Protection Agency, *FY 2022–2026 EPA Strategic Plan* (Washington, D.C.: March 2022). According to the EPA website, as of July 2025 EPA was no longer using the fiscal years 2022–2026 strategic plan and expected to publish a new plan by February 2026.

<sup>12</sup>Environmental Protection Agency, *E.O. 13985 Equity Action Plan: U.S. Environmental Protection Agency* (Washington, D.C.: April 2022); *Equity Action Plan: U.S. Environmental Protection Agency* (Washington D.C.: February 2024).

<sup>13</sup>The National Environmental Justice Advisory Council was composed of representatives from academia, community groups, industry and business, nongovernmental and environmental organizations, state and local governments, and tribal governments and indigenous groups. The Council was terminated on March 1, 2025.

<sup>14</sup>Implemented by EPA in partnership with the Department of Energy, the Environmental Justice Thriving Communities Technical Assistance Centers Program supports centers that provide communities with environmental justice-related technical assistance and training and participation in policy development. Eligible entities include public and private universities and colleges, nonprofit institutions, and intertribal consortia. According to EPA officials, in May 2025 the agency was reviewing the program to understand how it aligned with administration priorities.

---

<sup>15</sup>Environmental Protection Agency, *Achieving Health and Environmental Protection Through EPA's Meaningful Engagement Policy* (Washington, D.C.: August 2024).

<sup>16</sup>Environmental Protection Agency, *EPA Administrator Announces Agency Actions to Advance Environmental Justice* (Washington, D.C.: Apr. 7, 2021).

<sup>17</sup>Environmental Protection Agency, *Nonpoint Source Program and Grants Guidelines for States and Territories* (Washington, D.C.: May 4, 2024).

<sup>18</sup>The National Estuary Program funds projects that restore the water quality and ecological integrity of 28 estuaries along the Gulf, Atlantic, and Pacific coasts, and in Puerto Rico. See Environmental Protection Agency, *National Estuary Program Bipartisan Infrastructure Law Funding Implementation Memorandum for Fiscal Years 2022–2026* (Washington, D.C.: July 26, 2022).

<sup>19</sup>In addition, according to EPA officials, the governing statute of the Drinking Water State Revolving Fund, the Safe Drinking Water Act, requires a certain amount of support for state-defined disadvantaged communities. For information on steps EPA took to reduce barriers faced by vulnerable communities in accessing financial assistance for water infrastructure resilience, see GAO, *Water Infrastructure Resilience: Agencies Could Better Assess Efforts to Assist Communities Vulnerable to Natural Disasters*, [GAO-25-107013](#) (Washington, D.C.: Aug. 11, 2025).

<sup>20</sup>Environmental Protection Agency, *2024 Investing in America Report: Progress under The Bipartisan Infrastructure Law & The Inflation Reduction Act* (Washington, D.C.: December 2024).

<sup>21</sup>Environmental Protection Agency, *FY 2024 EPA Annual Performance Report Evidence and Evaluation Summaries* (Washington, D.C.: n.d.); Environmental Protection Agency, Office of Inspector General, *The EPA Should Improve Annual Reviews to Protect Infrastructure Investment and Jobs Act Grants to Clean Water State Revolving Funds* (Washington, D.C.: Mar. 14, 2024).

<sup>22</sup>Environmental Protection Agency, *FY 2024 Annual Performance Report* (Washington, D.C.: n.d.).

<sup>23</sup>In September 2024, EPA's Office of the Inspector General reviewed the Brownfields Program's implementation of the Justice40 Initiative. The office found that the program was on track to meet its Justice40 goal. However, EPA had to forecast benefits of the program to disadvantaged communities before the cleanup work was completed, and in doing so had overestimated such benefits. In response, EPA planned to update its forecasts and finalize and implement a new benefits methodology by March 2025. The Office of Inspector General closed its related recommendations prior to the completion of this work when the Justice40 Initiative was terminated in January 2025. See Environmental Protection Agency, Office of Inspector General, *The EPA's Brownfields Projects Program Is on Track to Meet Its Justice40 Goal but Overestimated Disadvantaged Community Benefits* (Washington, D.C.: September 2024).

<sup>24</sup>As of July 2025, the Interior website stated that the fiscal years 2022–2026 strategic plan would be updated in accordance with direction from the current administration. According to the website, a fiscal years 2026–2030 strategic plan will be released in October 2025.

<sup>25</sup>Department of the Interior, *Equity Action Plan* (Washington, D.C.: January 2024).

<sup>26</sup>Department of the Interior, *Department Manual, Part 512, Chapter 4, Consultation with Indian Tribes* (Washington, D.C.: November 2022); *Department Manual, Part 512, Chapter 5, Consultation with Indian Tribes* (Washington, D.C.: November 2022).

<sup>27</sup>Department of the Interior, *Equity Action Plan* (Washington, D.C.: January 2024).

<sup>28</sup>Department of the Interior, *FY 2022–2026 Learning Agenda* (Washington, D.C.: n.d.).

<sup>29</sup>Department of the Interior, National Park Service, *Land and Water Conservation Fund State Assistance Program: Federal Financial Assistance Manual Volume 72* (Washington, D.C.: Oct. 1, 2023).

In June 2024, Interior's Office of Inspector General found that the National Park Service had not taken sufficient steps to implement the Justice40 Initiative for the Land and Water Conservation Fund State Side Program's Outdoor Recreation Legacy Partnership, without which the National Park Service could not maximize the benefits of the program to underserved communities. The National Park Service stated that it would respond to all the office's recommendations, including by

---

collecting additional data and updating its benefit methodology. Department of the Interior, Office of Inspector General, *The National Park Service Should Ensure the Land and Water Conservation Fund State Side Program Compiles the Justice40 Initiative and Identify Data Necessary for the Program to Successfully Implement the U.S. Department of the Interior's "Equity Action Plan"* (Washington, D.C.: June 2024).

<sup>30</sup>Department of the Interior, *Fiscal Years 2024–2025 Annual Performance Plan and 2023 Report* (Washington, D.C.: n.d.).

<sup>31</sup>U.S. Department of Agriculture, *Strategic Plan Fiscal Years 2022–2026* (Washington, D.C.: March 2022). According to the department website, as of July 2025 USDA was developing a fiscal years 2026–2030 strategic plan, but USDA did not provide an issuance date for the plan.

<sup>32</sup>U.S. Department of Agriculture, *USDA Equity Action Plan in Support of Executive Order (EO) 13985 Advancing Racial Equity and Support for Underserved Communities through the Federal Government* (Washington, D.C.: February 2022); *Equity Action Plan 2023 Update* (Washington, D.C.: January 2024).

<sup>33</sup>U.S. Department of Agriculture, *Environmental Justice Strategic Plan* (Washington, D.C.: 2024).

<sup>34</sup>USDA's Equity Commission included members of tribal, farmer, and labor organizations; businesses; and state officials.

<sup>35</sup>U.S. Department of Agriculture, *Final Report: Recommendations Made to the U.S. Department of Agriculture to Advance Equity for All* (Washington, D.C.: February 2024).

<sup>36</sup>U.S. Department of Agriculture, *Get Started! A Guide to USDA Resources for Historically Underserved Farmers and Ranchers* (Washington, D.C.: July 2022).

<sup>37</sup>U.S. Department of Agriculture, *FY 2024 Annual Performance Report* (Washington, D.C.: n.d.).

<sup>38</sup>The Rural Data Gateway used the U.S. Centers for Disease Control and Prevention's Social Vulnerability Index—based on 16 factors such as poverty, housing cost burden, education, and housing type—to identify these counties. As of April 2025, the Rural Data Gateway no longer includes this information but does include information on investments in high-poverty communities.

<sup>39</sup>Following the termination of the Justice40 Initiative in January 2025, the National Academies of Sciences, Engineering, and Medicine ended the review and did not issue a report.

---

---

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



---

---

## GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

---

## Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

---

## Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

---

## Connect with GAO

Connect with GAO on [X](#), [LinkedIn](#), [Instagram](#), and [YouTube](#).  
Subscribe to our [Email Updates](#). Listen to our [Podcasts](#).  
Visit GAO on the web at <https://www.gao.gov>.

---

## To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/about/what-gao-does/fraudnet>

Automated answering system: (800) 424-5454

---

## Media Relations

Sarah Kaczmarek, Managing Director, [Media@gao.gov](mailto:Media@gao.gov)

---

## Congressional Relations

A. Nicole Clowers, Managing Director, [CongRel@gao.gov](mailto:CongRel@gao.gov)

---

## General Inquiries

<https://www.gao.gov/about/contact-us>



Please Print on Recycled Paper.