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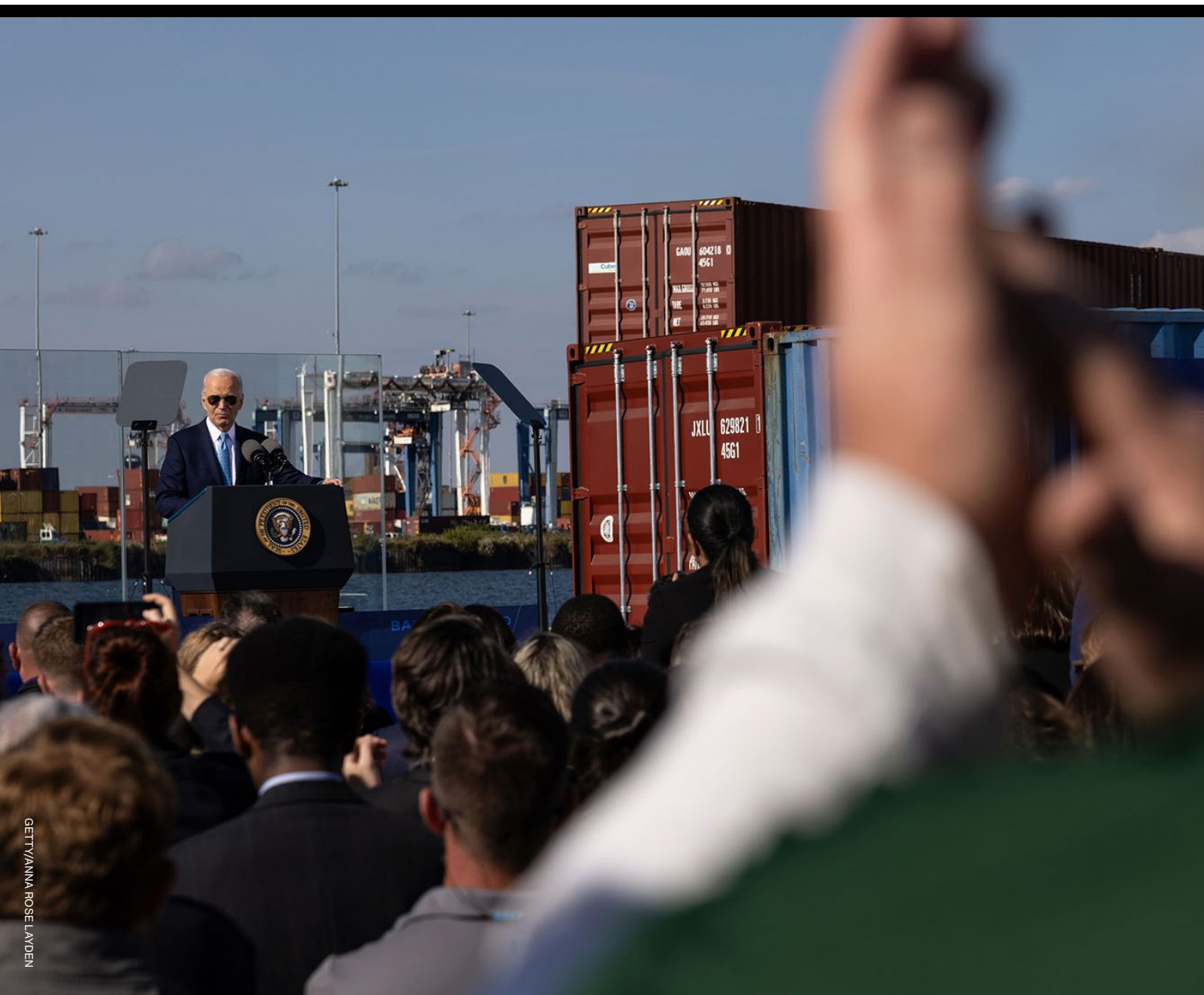
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Lessons From Implementing the Inflation Reduction Act

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Note: This report draws on interviews with more than 65 Biden administration officials and former career civil servants, reflecting their insights and the authors' opinions.



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A note from the authors

This report is the result of a monthslong effort by a team of former Biden administration officials who held senior posts at the White House, Department of Energy, Environmental Protection Agency, National Oceanic and Atmospheric Administration, and Department of the Interior. This team was contracted by the Center for American Progress to compile a report on lessons learned from the implementation of the Inflation Reduction Act's climate and clean energy grant and loan programs.[1] Over the course of three months, the team conducted more than 65 interviews with Biden administration officials and former career civil servants across federal agencies who played key roles in implementation. The findings from these interviews have been anonymized and form the basis of this report's reflections and recommendations. This report focuses on lessons learned from implementation of the Inflation Reduction Act's federal grant and loan programs; companion examinations of the law's tax provisions have been published by the Tax Law Center at New York University's School of Law and by a group of independent colleagues supported by The Navigation Fund.

Based on the interviews with White House and agency staff, the team's firsthand experience, and additional research, this report lays out recommendations for federal policymakers to design and implement federal climate and clean energy programs to maximize speed, effectiveness, and durability. The authors identified lessons from the implementation of the Inflation Reduction Act—what went well, where implementers encountered barriers, where changes in process or policy could have helped accelerate delivery, and where entirely new approaches are merited. The goal was to digest and document the lessons from the people who were doing the implementation work in the federal government for the benefit of future Congresses, executive branch leaders, and other stakeholders.

Introduction and summary

On August 16, 2022, President Joe Biden signed the Inflation Reduction Act into law.[2] The bill created new grant programs, loans, and tax provisions aimed at accelerating the build-out of clean energy, onshoring domestic manufacturing of clean energy technologies, and investing in resilience to climate impacts. The law also brought corporate tax reforms, capped the price of insulin, and created a new federal authority to negotiate certain prescription drug prices with health care companies. The bill contained more than $120 billion in new grant programs. Among them was a vast new loan program to repurpose legacy fossil fuel infrastructure for new economic purposes; $20 billion to expand the work of green banks, credit unions, and community development financial institutions (CDFIs); $4 billion to prevent catastrophic water shortages in the drought-ravaged Colorado River; grant programs to advance decarbonization, support struggling farmers, and reduce toxic pollution; and two dozen tax incentives to bring private capital off the sidelines to invest in clean energy infrastructure and manufacturing and make clean energy technologies more affordable for consumers.[3]

It was widely, and rightly, touted as the largest-ever U.S. investment in clean energy.[4]

The federal government moved with speed to implement the Inflation Reduction Act. Out of $115 billion in grant funding available for fiscal years 2022 through 2024—much of which was for brand-new programs that had to be designed from scratch—agencies had announced $107 billion in awards, and signed contracts to obligate more than $98 billion, by the time President Biden left office in January 2025.[5] The Department of the Treasury concurrently issued more than 90 tax guidance documents covering two dozen new or substantially revised tax provisions for businesses and individuals to invest in clean energy.[6] More than $500 billion in private sector capital was announced in support of clean energy projects, and nearly 100 gigawatts of new clean electricity generation and storage was added to the electric grid.[7] The Inflation Reduction Act funded the first new aluminum smelter in the United States in decades,[8] provided funds to all 50 states to help working families reduce their energy bills with solar and storage, and enabled hundreds of

loans to farmers and rural small businesses to do the same.[9] Investments in federal permitting personnel, technology improvements, and regulatory changes cut the time to complete the most complex federal environmental reviews by 23 percent compared with the first Trump administration.[10]

The Inflation Reduction Act demonstrated in a remarkably short period of time that a radically different way of thinking about combating climate change could bear fruit, driving both public sector and private sector investment into projects that cut pollution, create jobs, drive economic security, reduce energy costs for consumers and businesses, and improve communities. There are valuable lessons to learn from the experience of implementing the law that can and should inform future legislative drafting, executive branch staffing and structure, and investments from external stakeholders such as philanthropic funders, nonprofit organizations, and businesses working in clean energy industries.

The authors of this report interviewed more than 65 other former Biden administration officials and career civil servants across federal agencies who played key roles in the implementation of the Inflation Reduction Act's federal grant and loan programs and analyzed the findings to determine takeaways, key insights, and lessons learned.

This report organizes its analysis into three main areas:

- **Statutory dynamics,** which details the ways the law as passed by Congress did and did not enable effective and rapid implementation
- **Executive branch dynamics,** which reflects on common challenges such as federal hiring processes as well as on issues unique to the Biden-Harris administration
- **External dynamics,** including grantee readiness and the evolving communication environment

The report offers recommendations aimed at Congress, future executive branch leaders, and funders and external stakeholders. At a high level, the authors concluded the following:

- **Clear goals and flexibility in statute accelerated implementation.** Implementation was most successful when congressional intent was clear, agencies clearly and consistently articulated desired program outcomes, and Congress granted

agencies sufficient discretion and flexibility to design how programs would be implemented.

- **Unnecessary complexity slowed implementation.** Statutory language resulting in multiple, fragmented, and overlapping programs, combined with executive branch decisions to add further requirements, created overly prescriptive or complex new programs.

- **Hiring quickly and effectively is critical.** Every agency struggled to navigate arcane human resources (HR) policies and processes that made it difficult to quickly hire or internally transfer the necessary staff to design and implement large and highly complex programs.

- **Speed, durability, and policy complexity are competing priorities.** There were real trade-offs between speed, durability, and different policy priorities when it comes to designing grant and loan programs. Each additional policy priority layered into a program increases its complexity and implementation timeline—both during initial design and competition and later during project delivery.

- **External support needs to start earlier.** Philanthropies and external stakeholders played a critical role in supporting prospective grantees, particularly low-income and underserved grantees, in applying for, then implementing, funding. In many cases, this support did not scale until late in the application period or even after awards were made.

- **Significant, effective communications support is critical.** The Biden-Harris administration struggled to effectively communicate the benefits of the Inflation Reduction Act. Despite a significant emphasis on storytelling by the president and Cabinet that resulted in hundreds of local "Investing in America"-branded events, there was limited impact on public perception. In addition, while many external organizations made substantial efforts to champion Inflation Reduction Act programs and investments, they were not effective at breaking through the political noise.

There is always room for improvement. And the ongoing antagonism of the Trump administration toward clean energy technology and climate science,[11] coupled with its gutting of the federal workforce,[12] creates substantial headwinds for future policy change. But if there is one takeaway from the Inflation Reduction Act, it should be this: The federal government absolutely can do big things, at speed, to the benefit of the American people, when it is given the opportunity to do so.

A note on the current state of the federal government

Unfortunately, the second Trump administration has taken unprecedented and potentially unlawful actions to turn back the clock.[13] Within days of taking office, the administration attempted to unlawfully freeze all awards under the Inflation Reduction Act and the bipartisan infrastructure law. After the courts intervened, agencies began attempting to rescind grants with signed legal award agreements and obligated funding, sowing chaos and uncertainty for states, cities, Tribes, businesses, universities, and nonprofit organizations.[14] Within weeks, the Environmental Protection Agency attempted to claw back funds held by a third-party financial institution on behalf of awardees in the Greenhouse Gas Reduction Fund.[15] At the time of publication, these actions are subject to ongoing litigation—and across the country, work on cost-saving, job-creating projects has been at best frozen and at worst canceled.[16]

The Trump administration has also gutted the federal workforce. According to the Pew Research Center, in its first year, the Trump administration shrank the federal workforce by 10.3 percent—a net loss of nearly 238,000 workers.[17] In fact, as of March 2026, the Department of the Interior lost around 11,000 employees (more than 17 percent of its workforce)[18] and is reportedly in turmoil; the Environmental Protection Agency lost 24 percent of its workforce; and the Department of Energy lost more than 2,700 employees, with losses heaviest in science and energy innovation offices (about 1,190 employees).[19] The lasting negative impacts of these cuts on the government's ability to serve the American people—and the ability of future administrations to implement new policies and programs—cannot be overstated. Given this reality, the authors included specific statutory, administrative, and stakeholder-related recommendations in this report that reflect new federal capacity constraints, in addition to those experienced during Inflation Reduction Act implementation.

Republicans in the 119th Congress prematurely terminated many of the clean energy and manufacturing tax provisions in the Inflation Reduction Act despite the fact that red states and districts were the overwhelming beneficiaries of new clean energy generation and manufacturing projects.[20] The Department of the Interior has

been taking unprecedented actions to revoke, prevent, or slow-walk federal permits necessary for building hundreds of megawatts of clean energy projects across the country.[21] And not only has the second Trump administration withdrawn from the Paris climate agreement, but it has also begun the process of pulling the United States from the underlying U.N. Framework Convention on Climate Change, which was ratified during the George H.W. Bush administration. The administration also has reversed the long-standing scientific determination that climate pollution poses a threat to human health and the environment and therefore should be subject to regulation under the Clean Air Act.[22]

Under these circumstances, taking the time and space to look back at the choices and the challenges of the two-year effort to implement the Inflation Reduction Act may seem beside the point. However, many of the same circumstances that prompted the passage of the Inflation Reduction Act—growing challenges around energy affordability and reliability, exposure of the U.S. economy to geopolitical and supply chain risks, and an accelerating climate crisis—remain salient today. All new administrations come into office with a policy agenda that they want to see implemented, whether through existing laws or new legislation. A central lesson of Inflation Reduction Act implementation—and, ironically, of the Department of Government Efficiency (DOGE)-inflected Trump administration—is that new administrations also need to come into office with an operations agenda, a strategy, and a tactical playbook for how to actually mobilize federal resources and reform federal practices to deliver on whatever that policy agenda may be. Therefore, it is timely and important to consider lessons learned from inside the effort to turn an imperfect law into policy and, ultimately, progress. The Inflation Reduction

Background on the Inflation Reduction Act

Act was one of four major pieces of legislation passed during the Biden-Harris administration—the American Rescue Plan, the bipartisan infrastructure law (formally the Infrastructure Investment and Jobs Act), the CHIPS and Science Act, and the Inflation Reduction Act. Collectively, these came to be known as the "Investing in America" agenda. This White House effort to create a uniform brand papered over substantial differences in the structure of the bills, as well as the goals of their lead drafters. The American Rescue Plan was designed and intended to deploy funds as rapidly as possible to fill gaps in the still-struggling pandemic economy of early 2021—including providing aid to state and local governments and school districts, distributing additional funding for pandemic response and vaccine distribution, and providing economic relief to individuals through stimulus payments and an expanded child tax credit, among other measures.[23] By the time the "Investing in America" brand came to dominate Biden-Harris administration messaging, the American Rescue Plan had largely run its course, with well more than 90 percent of funds obligated or disbursed.[24]

The bipartisan infrastructure law and the CHIPS and Science Act were both bipartisan pieces of legislation that passed through regular order, with 60 votes required in the Senate.[25] The bipartisan infrastructure law, which passed in autumn 2021, generally appropriated funds for a five-year period, with some program-specific exceptions, meaning agencies needed to award or obligate more than $1 trillion within five years.[26] The CHIPS and Science Act appropriated $52.7 billion largely to the Department of Commerce, for the construction of semiconductor fabrication plants, and created a new tax credit for manufacturing semiconductor chips; the "Science" portion of the act consisted of many new authorized programs but no appropriated funds.[27]

The fourth and final of these packages, the Inflation Reduction Act, was passed on August 12, 2022, via reconciliation, with only Democratic votes in either chamber and Vice President Kamala Harris casting the tie-breaking vote in the Senate.[28] Senate Democrats were in some cases constrained from including provisions in

the law, such as revisions to federal permitting statutes, by arcane procedural rules governed by the Senate parliamentarian.[29]

The Inflation Reduction Act contained grant programs, loan authorities, and tax incentives in clean energy and climate, alongside a set of corporate tax reforms and new provisions allowing Medicare to negotiate prescription drug prices for the first time. The Congressional Budget Office scored the overall legislative package as deficit-reducing, with an estimated net decrease in the deficit of $90 billion from 2022 to 2031.[30]

The Inflation Reduction Act's climate and clean energy provisions consisted broadly of the following:

- **$130 billion in grant programs.** This category included grants awarded on either a competitive or an allocated basis, so long as the grantee was external to the federal government. Congress made the bulk of this funding available to be awarded beginning in fiscal year 2022, while $14.5 billion in funding at the U.S. Department of Agriculture was only available in fiscal year 2025 or later.[31]

- **$12.275 billion in credit subsidy for more than $310 billion in loan authority.**[32] This category included new and expanded programs at the Department of Energy Loan Programs Office to support investments in innovative clean energy businesses, clean vehicle manufacturing, Tribal clean energy, and repurposing legacy fossil fuel infrastructure for new economic purposes.[33]

- **24 new or revised tax provisions.** These tax provisions for businesses, individuals, and tax-exempt entities composed the lion's share of the clean energy investment mobilized by the Inflation Reduction Act.[34] Lessons learned from this segment of the law are detailed in reports released by the Tax Law Center at New York University's law school and the Clean Energy Tax Blueprint.[35]

- **$1.7 billion in internal spending.** This category included budget lines for improving federal permitting; hiring administrative staff in certain agencies; procuring certain goods and services for the federal government; and investing in federal infrastructure such as public lands, national parks, and national labs. While funds could be awarded on a competitive basis to vendors, these budget lines are properly understood as different from "grant programs" that award funds to nonfederal actors for nonfederal purposes.[36]

These programs can further be divided into programs that targeted:

- **State, local, and Tribal governments,** such as the Climate Pollution Reduction Grants program at the Environmental Protection Agency (EPA); the Green and Resilient Retrofit Program at the Department of Housing and Urban Development (HUD); the Urban and Community Forestry Program at the U.S. Department of Agriculture (USDA); the Tribal Electrification Program at the Department of the Interior (DOI); and the Climate Resilience Regional Challenge at the National Oceanic and Atmospheric Administration (NOAA).

- **Nonprofit organizations,** such as the Greenhouse Gas Reduction Fund and the Community Change Grants Program at the EPA and the Empowering Rural America (New ERA) program for rural electric cooperatives at the USDA.

- **Businesses,** such as the Domestic Manufacturing Conversion Grants Program at the Department of Energy (DOE), the sections 1703 and 1706 Loan Programs Office programs at the DOE; the Low-Carbon Transportation Materials Grants program at the Department of Transportation, and most of the clean energy tax incentives managed by the Department of the Treasury.

Many of these programs allowed for multiple types of recipients. For example, the Community Change Grants Program at the EPA permitted awards to community-based organizations in partnership with universities or local or Tribal governments.[37]

In December 2022, the White House implementation office published a guidebook to the law's provisions to make understanding the law's contents easier for a range of stakeholders and the public.[38] It remains available via the archived Biden White House website.

Statutory dynamics

The manner in which Congress writes a bill has a direct effect on its implementation. The wording, structure, and legislative vehicle determine how it works in the real world. The Inflation Reduction Act was passed through the budget reconciliation process, which meant it had to conform to rules enforced by the Senate parliamentarian. This section explores how the statutory text both enabled and hindered implementation, as well as offers recommendations for ways in which future Congresses can improve the drafting process for better outcomes.

How Congress enabled implementation

Engaging agency experts in drafting the legislation

According to multiple interviews, programs were set up for success when there were close relationships between congressional and agency staff. When congressional staff consulted agency experts in drafting bill language, they were able to craft legislation better aligned with agency expertise, tools, and capacity, as well as better meet the needs of agencies and grant recipients. Senior Interior Department officials pointed to the Tribal Irrigation and Power, Safety of Dams and Water Sanitation program (which was authorized in the bipartisan infrastructure law) as a clear example of this principle.[39] After conversations with the department, committee staff amended language to ensure explicit authority to use critical Tribal funding vehicles—compacts and contracts—that sped awards and expanded the eligible projects to include dam safety and water sanitation, which were unfunded high-priority projects for Tribes. This kind of communication to take agency policy and technical input was especially important and effective when it came to creating new programs.

However, when such coordination was absent, the legislation was often overly complex or prescriptive, more difficult to execute, or failed to meet real-world needs to accelerate clean energy uptake. This was an oft-cited issue at the Department of

Energy, which had many new programs created under the Inflation Reduction Act. For example, the $2 billion Transmission Facility Financing Program required the DOE to complete a corridor designation process informed by national transmission needs before providing access to loan financing, which dramatically extended the timeline for the DOE to finance transmission projects.[40] If Congress had accepted technical input from DOE staff on this approach, it likely would have resulted in a more effective program that could make awards faster.

Congress should consult agency staff with expertise while drafting legislative text, specifically considering how it will be implemented in the real world when writing the language, and take their recommendations whenever possible.

Taking a portfolio approach

The Inflation Reduction Act intentionally made grants and loans available to a wide variety of eligible entities, including states, cities, Tribes, nonprofit organizations, and private businesses. That was an improvement on the bipartisan infrastructure law, in which funds largely flowed through states.[41] This "portfolio" approach had a number of advantages, particularly when combined with flexible statutory language around program design. Where Congress increased funding to effective existing programs, such as at NOAA, the USDA, and the EPA, agencies were able to quickly award funds that drove real progress in communities, according to multiple interviews. Where Congress created new programs to solve new problems and provided flexible statutory language that did not tie agencies' hands in making design choices, interviewees noted that agencies proved capable of quickly standing up innovative new programs and awarding funds quickly and responsibly to eligible entities. And where Congress wrote language where states were eligible recipients of funds, some of those awards have proved more durable when faced with the Trump administration's potentially unlawful steps to attempt to cancel contracts and obligations.[42]

Congress should consider replicating the Inflation Reduction Act's portfolio approach to creating and expanding ambitious grant programs in future legislation, particularly given newly severe capacity constraints in the federal workforce.

States are just one part of the portfolio

Policymakers should avoid an overreliance on states as the partner of first resort to the federal government, particularly in energy policy. While this approach has proved relatively more politically durable for some programs, it comes at a real cost in deployment timelines while still leaving programs exposed to politically motivated terminations. For example, Inflation Reduction Act programs that made funds available to all 50 states – whether by formula or through competitions with modest barriers to entry – have been among the most durable, so far, against the Trump administration's efforts to unlawfully cancel obligated grants. Examples include the DOE's home energy rebate programs and the Climate Pollution Reduction Grants program at the EPA.[43] In July 2026, however, the Trump administration acknowledged in court filings that $7.6 billion in Department of Energy grants had been terminated based on a partisan political screen of where projects were located – just one example of the limits of this argument.[44]

States are frequently slow and unpredictable implementation partners, and in the energy sector in particular, states are not the primary decision-makers driving most investments. States face significant and growing capacity constraints, as many state workforces never recovered from Great Recession-era contractions.[45] This makes it difficult for the federal government to rely on states to move quickly to set up new programs, even if they have the political will to do so – and once states know they are going to receive funds, the federal government loses what little leverage it has to drive faster progress. For example, the National Electric Vehicle Infrastructure (NEVI) Formula Program for funding electric vehicle charging infrastructure flowed through state departments of transportation, which led to well-documented implementation delays in part due to workforce capacity constraints.[46] The DOE's home energy rebates programs are another prime example of how funding through states can have mixed results. The Inflation Reduction Act created two rebate programs for consumers – one for purchases of certain high-efficiency electric appliances and the other for whole-home energy efficiency retrofits – and required funds to flow to state energy offices. These funds were made available to state energy offices according to a formula allocation. The DOE was able to announce these allocations very early in the implementation process, in fall 2022.[47] Notably, the first state to launch a rebate program with Inflation Reduction Act funds was New York, which has a large and well-staffed state energy office and which already had experience running a similar program.[48] According to multiple interviews, states without similar experience or capacity moved more slowly, as many needed to hire or contract new personnel or capacities in order to make two brand-new programs viable.[49]

And political will is no small matter. For much of 2023, as Gov. Ron DeSantis (R) was running for president, the state of Florida was in an internal tug of war over whether it would accept its allocated rebate funding, and a line-item veto of the state energy office's request to draw down planning money from the DOE led to multiple press stories[50] speculating about whether Republican governors would reject Inflation Reduction Act funds – and demands from Democrats that the DOE make funds available to municipalities if the state rejected them, something that it was not allowed to do under the statute.[51] Ultimately, Florida quietly accepted the funds after Gov. DeSantis dropped out of the presidential race and is still planning the launch of its rebate programs.[52] Congress could have explicitly allowed the DOE to run the program directly, either on a state opt-in basis where resource constraints were a concern or as a default if states refused the funds. For example, South Dakota declined funding for its home energy rebates programs, and its residents are unable to benefit from them. Congress also could have given the DOE greater flexibility in awarding funds to cities or nonprofits if states did not want to run the program themselves, as it did in the EPA's Climate Pollution Reduction Grants program, which reallocated planning funds to municipal areas if states declined to accept formula funds.[53] However, the statute did not provide this kind of flexibility, contributing to an ongoing, slow, state-by-state rollout.

In the future, Congress should focus state programs on areas where states have unique jurisdiction or value, provide flexibility to federal agencies to determine when and how to go through states versus other recipients, and support state implementation capacity where states will be in the lead.

Balancing new and existing programs

In a small number of places, the Inflation Reduction Act increased funds for existing programs—sometimes dramatically. At the USDA, the popular Rural Energy for America Program (REAP), which provides grants and loans to farmers and rural small businesses to install clean energy technologies, saw its funding increase from annual appropriations of around $50 million to more than $2 billion.[54] The agency's climate-smart agriculture programs saw even greater increases.[55] In cases where existing programs were popular, had adequate staffing capacity, and were focused on relevant problems that required more investment, increasing funds—rather than standing up entirely new programs—worked well, according to multiple interviews. These programs awarded funds more quickly and, in general, with more durability. Based on interviews, projects that received funding early on were able to start work, and in some cases complete it, before the end of President Biden's term. New

programs took longer to stand up, and even if funds were obligated before the end of the term, that did not mean projects were able to start work.

Creating new programs when they serve genuinely new purposes is an important tool for Congress where existing federal authorities do not provide the right tools to tackle complex issues. However, creating entirely new programs necessarily means that those programs will be slower to get underway, as agencies must make dozens of discrete decisions about how new programs will be staffed, managed, designed, and operated. The overwhelming majority of work on grant and loan programs in the first year of Inflation Reduction Act implementation was focused in these areas—meaning that most grant award decisions were not made until 2024.

For example, the bipartisan infrastructure law created the Transmission Facilitation Program, a $2.5 billion revolving fund to support the development of new and upgraded transmission infrastructure.[56] The Inflation Reduction Act then created a separate $2 billion pot of money for direct loan authority under a new Transmission Facility Financing program, which ultimately was not awarded.[57] Implementation of the latter $2 billion unquestionably would have been faster and more effective if new authority and funding had been added to the existing program, rather than having two similar (and similarly named) programs operating in parallel, according to interviews.

Congress should default to providing funding through existing programs where there is adequate existing authority and capacity and focus new programs on problems that cannot be addressed with existing tools, unless the new programs are funded at sufficiently robust levels to justify the incremental implementation demands on overstretched federal, state, and local partners.

USDA urban and community forestry

While the U.S. Forest Service is best known for managing the nation's vast national forests, it is also home to a small Urban and Community Forestry office, which is the only federal program dedicated to helping cities and towns manage trees and green spaces.

But the Urban and Community Forestry Program historically received only a tiny amount of annual appropriations – about $40 million annually.[58] What's more, the program was structured to send funds exclusively to state forestry agencies, which would then pass funds on to cities and towns. Interviewees noted that some states did this reasonably equitably, concentrating funds in poor communities where they could make the most impact. However, according to the interviews conducted for this report, local officials in "blue" cities located in "red" states often report challenges accessing federal funds from state agencies.

The Inflation Reduction Act did two big things to change the Urban and Community Forestry Program. First, it massively increased the amount of funding available to $1.5 billion.[59] Second, it explicitly made the funds available not only to state agencies but also directly to local governments, Tribes, territories, and nonprofit organizations. This flexibility enabled the program office to provide a portion of the funds to state forestry offices as it would ordinarily do but also to design and launch a first-of-its-kind national competitive grant program to provide funds directly to cities, towns, and nonprofit organizations. This latter, $1 billion effort resulted in nearly 400 obligated awards,[60] 100 percent of which benefited communities that fell under the Biden-Harris administration's Justice40 criteria.[61] And in part because this statutory change came as a tweak to an existing program, the Forest Service was able to move with speed to design the funding opportunity, launch the program, and make awards, announcing all $1.5 billion in funding within about a year of the law's passage.

Unfortunately, the ending of this statutory success story is currently unknown. The Urban and Community Forestry Program, with its emphasis on serving low-income communities, fell under the Trump administration's anti-"diversity, equity, and inclusion" axe, and the USDA has attempted to unlawfully terminate at least some of the obligated grants.[62] Lawsuits over the fate of those grants have not yet been decided.[63]

Thoughtfully setting deadlines

Most of the Inflation Reduction Act's grant and loan funds were available to federal agencies through 2030 or 2032, though agencies moved much more quickly than that to award and obligate funds.[64] In some places, however, Congress wanted to clearly direct agencies to move more quickly than they might otherwise be inclined to do from the get-go. Statutory deadlines to accelerate implementation should be paired with statutory flexibility that does not penalize agencies in the case of litigation delays, grant terminations, and other extenuating circumstances. Many grants terminated in 2025 are now being challenged in the courts.[65] However, even if a court orders those programs restarted, an agency's ability to make new awards may be limited by the very statutory deadlines inserted to support them.

> Congress should set thoughtful deadlines to accelerate program implementation while working with agencies to ensure compatibility and providing flexibility for extenuating circumstances.

Case study: 3 statutory deadlines, 3 different outcomes

Congress set three ambitious statutory deadlines across two marquee EPA programs using three different mechanisms. Well-structured deadlines can be a powerful force that pushes agencies to move expeditiously. However, if they are not crafted carefully, they can undermine the programs they are intending to support.

The first deadline was completely ineffectual. The $27 billion Greenhouse Gas Reduction Fund (Section 134 of the Clean Air Act) had two statutory deadlines: first, "to make grants, on a competitive basis and beginning not later than 180 calendar days after the date of enactment," and second, to obligate funds by September 30, 2024. Statements from members of Congress indicated that the first deadline was intended to result in a fully executed, competitively awarded agreement six months after bill passage, which did not provide enough time to design and run a new and highly complex competition, then negotiate the legal agreement(s).[66] This language, if written more restrictively, could have been a major risk and opened the entire competition to legal challenges. The agency complied with the deadline by publishing a federal assistance listing within 180 days,[67] which is the first step in the competitive grant process, but fell far short of

what some members of Congress intended.

The second deadline was a powerful accelerant. Statute gave the agency two years to award the same $27 billion in funds before they expired.[68] This set an ambitious yet more achievable deadline. That two-year "shot clock" proved instrumental for several reasons. First, it's very likely that award agreements would not have been finalized until much later in 2024 absent a clear deadline. According to multiple interviews, that deadline allowed the agency to manage expectations from external stakeholders, break through internal resistance, and maintain strategic focus. Second, interviewees noted that the deadline was a valuable defense when congressional Republicans attacked the program for moving too quickly. While the agency was confident in the quality of work that could be completed within two years, it was still valuable to point to a statutory deadline in response to allegations that the timeline was driven by political considerations of obligating funds in the first term.

The third deadline put an entire program's success in jeopardy. The $3 billion Environmental and Climate Justice Block Grants (Section 138 of the Clean Air Act) program also had a "shot clock" provision, seeking faster impact by requiring that grants be awarded "for periods of up to 3 years to eligible entities to carry out activities described."[69] While the congressional intent here was to ensure that grantees moved expeditiously, this language proved seriously detrimental to the program and the local community-based organizations it was intended to serve. The language gave the agency no flexibility to waive the deadline even due to delays totally outside the grantees' control – from delays obtaining local, state, and federal permits, to supply chain disruptions, to force majeure events. As a result, applications were heavily skewed toward smaller projects that did not necessarily represent communities' highest priorities or have the most impact potential, according to interviews. Career grant experts also anticipated that, absent a later statutory fix, many grants would still have been out of compliance after three years with no path to remedy. That would have put them at risk of adverse actions by the Inspector General, limited the agency's ability to reimburse them for expenses, and even – in the more dire scenario – created an environment where a future administration could demand full repayment of the grant even for funds expended on completed work.

Providing sufficient funding for administrative needs

Funding for supportive functions and administrative needs is key to efficient and successful implementation of federal programs, and Congress largely provided

funding for this in the Inflation Reduction Act. For example, Section 70007 of the Inflation Reduction Act $350 million to the Federal Permitting Improvement Steering Council (FPISC) Environmental Review Improvement Fund to support the administration, implementation, and enforcement of Title 41 of the Fixing America's Surface Transportation Act (FAST-41) and modernize and improve permitting.[70] Agencies used this funding to hire new staff to expand capacity for environmental reviews and permitting, to implement new efficiencies, and to make long-overdue improvements to technical systems. The law also included funds for permitting staff directly at some key agencies, including the USDA and the DOE.[71] These funds, alongside administrative improvements and regulatory changes, enabled the administration to reduce timelines for completing the most complex environmental reviews by 23 percent relative to the first Trump administration.[72]

However, Congress failed to provide sufficient administrative funding across agencies and programs, and in some prominent cases, capped the amount agencies could spend on administrative needs at draconian rates. Notably, the Greenhouse Gas Reduction Fund could spend only $30 million of its $27 billion on administrative needs over a 10-year window. That represents a 0.1 percent administrative set-aside compared with administrative set-asides of 2 percent to 5 percent across other programs.[73] While the urge to limit the potential for administrative bloat is understandable, limited administrative funding has been cited repeatedly by the EPA's Inspector General as creating elevated risks for the program[74] and risks jeopardizing the overall program and its goals in a scenario where a future Congress refuses to provide annual appropriations.

> Congress should be mindful that new or expanded programs create substantial administrative burdens for federal agencies and applicants, and it should work with agencies during the drafting stage to include sufficient funding for administrative functions such as permitting, grant personnel, technology, and technical assistance.

Flexible language

While the authors heard from many interviewees that the lack of flexibility in the Inflation Reduction Act's language created problems, there was one example where flexibility was built in, which led to better outcomes. The EPA's Office of Air and Radiation was able to leverage flexible statutory language to use Inflation Reduction Act funding to make additional awards under the American Rescue Plan-funded Community Air Monitoring grant program. The application window for this program had already closed, but there was not sufficient American Rescue Plan money to

fund all the high-quality applications received. As a result of the flexibility in the Inflation Reduction Act language for EPA Clean Air Act grant implementation, EPA staff were able to fund additional projects only three months after passage of the law.[75]

Another example where flexibility in the language made implementation easier was with the Greenhouse Gas Reduction Fund (GGRF). Interviewees noted that in creating the GGRF, Congress took action to expedite project delivery by amending the Clean Air Act.[76] This enabled the EPA to distribute the GGRF funds efficiently because actions under the Clean Air Act are largely exempt from review under the National Environmental Policy Act.

> Congress should allow for the flexible use of funds where possible and take steps to remove other time-consuming, unnecessary administrative hurdles. Consulting with agency staff in the drafting process can help illuminate where building in these flexibilities would have the greatest impact.

How Congress hindered implementation

Too many new programs, too late

Across agencies, the Inflation Reduction Act created dozens of brand-new programs—most of which received billions of dollars in appropriations. At the EPA alone, more than $42 billion was appropriated for programs that did not exist prior to the passage of the Inflation Reduction Act. More than 80 percent of the $21.6 billion appropriated to the DOE for grant programs went to new initiatives, not even counting the substantial expansion in authority to the Loan Programs Office created by the law.[77]

Creating new programs is often necessary to solve new and complex challenges and where existing authority is outdated or insufficient—for example, that which prioritizes outdated, polluting technologies. However, it naturally takes longer for funds to be awarded through new programs than through existing ones, and every new program multiplies demands on staff both at agencies and among potential recipients. Agencies have to set up program teams, solicit public input into program priorities and design through both meetings and written requests for information, decide how to structure grant competitions, write and release notices of funding opportunity, publicize the opportunity, create technical assistance resources for prospective grantees, review and adjudicate applications, and make award decisions—all before a dime of funding actually leaves the Treasury and ends up in the hands of

a recipient. The EPA was tasked with creating 25 new programs, each appropriated at less than $100 million (and some as small as $3 million),[78] which distracted from higher-impact efforts to implement more than $60 billion in total supplemental appropriations across the bipartisan infrastructure law and Inflation Reduction Act.

In comparison, where the Inflation Reduction Act increased funds to existing programs, several of the implementation steps are naturally mooted, while others remain important. For instance, the substantial expansion of the Rural Energy for America Program required additional effort to reach prospective grantees and educate them about the opportunity, as well as additional surge staff capacity to review applications and make award decisions, but the basic program design was well-established and understood by stakeholders both inside and outside the federal government.

There are some opportunities to reduce the amount of time necessary to implement brand-new programs. However, these come with trade-offs and in some cases were not legally available to agencies. Stakeholder input is crucial for agencies to design programs that are responsive to communities' needs. At the same time, as

> Congress should limit the creation of new programs to problems that cannot be addressed by increasing funding for existing programs. Further, Congress should recognize that appropriating larger amounts of funding to a more concentrated number of programs will allow for more rapid, focused implementation by both federal agencies and nonfederal partners by reducing the administrative burdens that naturally arise

detailed by the former CHIPS and Science team in Factory Settings, the Paperwork Reduction Act (PRA) ironically makes the task of gathering such input onerous and time-consuming.[79] Congress could waive PRA requirements where speed is a priority, or it could enact more wide-reaching reforms to the PRA itself across the board.

Duplication

Many programs had overlapping purposes and types of awardees, which many interviewees noted made applying for and using funds harder for applicants, slowed down deployment of funds, and made it more difficult to communicate about the Inflation Reduction Act.

Awardees had to navigate a large number of different programs across various agen-

cies that could work to meet their needs but had slightly different criteria, priorities, and specifications. For example, companies seeking funds for industrial decarbonization could apply for the DOE's Industrial Demonstrations Program (funded through two separate sections of the bipartisan infrastructure law and the Inflation Reduction Act with different requirements), Treasury's 48C Qualifying Advanced Energy Project Tax Credit (which was a capped tax credit with implementation similar to a grant program and which included a category for industrial decarbonization), and/or the DOE's Carbon Capture Demonstration Projects Program.

Agencies generally had to set up separate processes for highly related programs, which wasted time and internal resources. In some cases, agencies were able to combine funds and implement programs together. For example, the DOE implemented two industrial decarbonization programs, one from the bipartisan infrastructure law and one from the Inflation Reduction Act, together as the Industrial Demonstrations Program.[80] The DOE also implemented several grid-related programs together through the Grid Resilience and Innovation Partnerships Program.

> Where possible, Congress should aim for fewer programs with greater funding rather than a larger number of smaller programs for the same purpose.

Having many small programs with the same purpose but different requirements and criteria made it difficult to communicate the wins of the Inflation Reduction Act and the bipartisan infrastructure law. Instead of a few large programs that the administration could talk about repetitively, agencies released a drumbeat of press releases about the various award steps for each individual program. This made it more difficult to communicate to the public about what the Inflation Reduction Act was and why it mattered.

Case study: DOE state programs

The DOE had at least 10 separate programs providing formula funding to support states, totaling more than $16 billion.[81] Many of these programs supported similar technologies and interventions – such as energy efficiency upgrades – through different mechanisms, including consumer rebates, funding for nonprofit implementing agencies administered through states, flexible funding for state energy offices, and others.[82] Of these 10 provisions, eight were new programs or revivals of dormant programs and two were expansions of existing programs.[83] Each program had its own implementation rules and guidance. States had to provide separate paperwork to receive the formula funds and apply for the competitive programs, which, as noted by multiple interviewees, was an inefficient way to

distribute funds and stretched already-limited capacity within state governments.

A different approach could have distributed funds more quickly and freed up state government capacity. For example, imagine that the DOE had a single pot of money for states with broad authority that encompassed all the eligible uses in the 10 Inflation Reduction Act and bipartisan infrastructure law programs. The DOE could then put out a single guidance document, directing states to submit plans for how they would use the funds to meet their state-specific needs, within the bounds of the program. Some states might focus on rebates, while others might focus on a revolving fund or worker training. DOE would then revise and approve the plan, and the states would receive the money and start implementing. A larger program could still focus exclusively or primarily on electrification, energy efficiency, and low-carbon technologies while substantially reducing administrative and compliance burdens on agencies, states, and partners.

TABLE 1

The U.S. Department of Energy (DOE) oversaw at least 10 separate programs to support states' energy and climate interventions during the Biden-Harris administration

10 separate DOE programs provided formula funding for similar state climate interventions and technologies

Program	Law	Funding
Home Efficiency Rebates (HOMES)	IRA Sec. 50121	$4.3B
Home Electrification and Appliance Rebates (HEAR)	IRA Sec. 50122	$4.5B
State-Based Home Energy Efficiency Contractor Training Grant Program	IRA Sec. 50123	$200M
Grid Resilience State and Tribal Formula Grants	BIL Sec. 40101(d)	$2.3B
State Energy Program	BIL Sec. 40109	$500M
Weatherization Assistance Program	BIL Sec. 40551	$3.5B
Energy Efficiency Revolving Loan Fund Capitalization Grants	BIL Sec. 40502	$250M
Resilient and Efficient Codes Implementation (RECI)	BIL Sec. 40511	$225M
Energy Auditor Training Grants	BIL Sec. 40503	$40M
Energy Efficiency and Conservation Block Grants	BIL Sec. 40552	$550M

*Note: The IRA stands for the **Inflation Reduction Act**, and the BIL stands for the **bipartisan infrastructure law.***

Source: The White House, "Building a Better America: A Guidebook to the Bipartisan Infrastructure Law for State, Local, Tribal, and Territorial Governments, and Other Partners," (Washington: 2022); The White House, "Building a Clean Energy Economy: A Guidebook to the Inflation Reduction Act's Investments in Clean Energy and Climate Action, Version 2," (Washington: 2023).

Table: Center for American Progress

Excessive specificity

In some clean energy programs, statutory language provided specific, rigid requirements that made it difficult for agencies to adjust programs based on rapid changes in the world or new information from stakeholders.

It is sensible for Congress to impose requirements on programs and draw boundaries around eligible uses. In fact, baseline requirements—for example, to restrict funding to zero-emission technologies or to ensure that programs support sound decarbonization strategies—are important to ensure program effectiveness. However, for many programs, Congress went much further than workable requirements or simple boundaries.

Two prominent examples come from the bipartisan infrastructure law. For example, the Carbon Capture Demonstration Projects Program required the DOE to support two projects each on coal-fired power plants, gas-fired power plants, and industrial facilities.[84] The hydrogen hubs program similarly required the DOE to support at least one project in each end-use sector and at least one project per power generation source (fossil fuels, nuclear, and renewables), rather than allow the DOE to identify the most viable and useful applications.[85]

These restrictions limited the DOE's ability to respond quickly to real-world challenges that emerged during implementation. For example, interviewees noted that it became clear that demand-side support was necessary to support the commercial viability of the hydrogen hubs. Demand-side support includes measures that bridge the gap between producers, who need medium- to long-term offtake certainty for a significant portion of their projected output to secure financing to build a project, and buyers, who often prefer to buy on a short-term basis. This demand-side mechanism did not launch until 2024.[86]

Congress should provide overarching goals and boundaries for programs but refrain from issuing overly prescriptive technology and subsector restrictions. Flexibility for agencies to respond to changes in the economy and technological progress is critical for effective implementation.

Lack of hiring authority

The lack of special hiring authorities in the Inflation Reduction Act made it difficult for agencies to hire necessary staff to implement programs. By comparison, the

bipartisan infrastructure law provided the DOE with special hiring authorities; these were not extended to other agencies by the bipartisan infrastructure law nor to any agencies by the Inflation Reduction Act. This flexibility allowed the DOE to move quickly to recruit a large cohort of experts to design and implement its programs, utilize a centralized recruitment portal and branding—the Clean Energy Corps[87]—and bypass many of the sclerotic barriers to hiring outlined elsewhere in this report. The lack of similar authorities in the Inflation Reduction Act forced agencies to rely on a patchwork of other authorities and tools that were less efficient and prevented a more coherent recruitment campaign.

> "[T]he Secretary of Energy, upon a determination that there is a severe shortage of candidates or a critical hiring need for particular positions to carry out the Department of Energy activities funded under this title, may, from within the funds provided to the Department of Energy under this title, recruit and directly appoint highly qualified individuals into the competitive service."[88]

Congress should reform federal hiring writ large to enable agencies to hire competitively and quickly across the board. Absent wholesale reform, Congress should provide special hiring authority across all implementing agencies, including by taking advantage of new Senate parliamentarian precedents to include such authorities in budget reconciliation bills.

Failure to address structural constraints

Agencies operate within a complex structure of statutory, regulatory, and policy constraints in establishing programs, awarding and disbursing funds, and positioning recipients for success. Failure to anticipate and address these requirements limited program reach and outcomes, and Congress largely did not consider them when passing the Inflation Reduction Act. These requirements included:

- **Cost share.** Program recipients across the board—from state, local, Tribal, and territorial governments to nonprofit organizations to private landowners—all cited statutory match and cost share requirements as a barrier to participation, especially given short application periods and the existence of multiple, in some cases overlapping, funding opportunities. Even where governments may have been

able to raise match funds, the timing of legislative budgetary sessions (which in some states occur only every other year) created a logistical barrier as real as any fiscal one. Where Congress eliminated match requirements or left discretion to agencies to reduce or waive them, programs moved resources more quickly to a broader range of recipients where investments could have the highest impact on program goals, according to multiple interviews.

- **Tribal consultation.** Agencies also struggled to meet their Tribal consultation obligations. The Inflation Reduction Act alone directed an unprecedented $722.5 million specifically to Tribal and Indigenous communities and included another $45 billion where these communities were eligible to apply to broader grant competitions.[89] Programs across agencies had significant immediate consultation obligations, yet most did not have the expertise, dedicated staff, or relationships to execute on them. That led to program delays and design and execution inefficiencies.

Lesson learned: Tribal consultation at NOAA

At NOAA, Tribal consultation was not required by statute for Inflation Reduction Act funding as it was in bipartisan infrastructure law funding. Therefore, the agency drafted and submitted spend plans without conducting formal Tribal consultation. Once certain stakeholders in Congress and the White House learned of this, NOAA was directed to go back and do Tribal consultation and then redo its spend plans accordingly. Multiple NOAA officials admitted that the agency made a strategic mistake in not doing Tribal consultation from the beginning. Although doing consultation caused a delay in funding implementation, several interviewees acknowledged that the outcome was better. It forced NOAA to think differently about funding mechanisms, including putting money directly into existing Bureau of Indian Affairs contracts, which was requested by Tribes during consultation. This was a process familiar to Tribes but not something NOAA had ever used before. It ended up using this mechanism, which can be replicated for future funding.

Another reflection from NOAA officials was that there is a need to build up core competencies within the agency for how to go about Tribal consultation and build trust with Tribal stakeholders. Certain career staff were deeply invested, but in general, there is a need to train staff and develop institutional competency for Tribal engagement.

Reflections on how to improve Tribal consultation were also heard from Interior officials: To improve consultation efficiency in future efforts, agencies should

develop and disseminate strong written guidance to Tribes earlier in the process rather than at the end. In general, broader flexibility when it comes to funding for Tribes should be embraced across the government.

Compliance with other statutes

Several interviewees noted that routine statutory requirements created multiple hurdles for agencies. In addition to the Paperwork Reduction Act example previously discussed, compliance with other little-known statutes created unanticipated challenges. For example, while it was a bipartisan infrastructure law program, the Department of the Interior's Federal Orphaned Wells Program spent much of 2024 working on Section 106 compliance based on statutory language that the agency interpreted to mean that each of the 10,000 individual wells identified to be plugged, some as small as 2 feet by 2 feet, had to secure National Historic Preservation Act (NHPA) Section 106 compliance. Congress may want to consider either waivers or programmatic compliance options for some of the kinds of statutory requirements created by laws such as the PRA and the NHPA.

Congress should consider and address structural barriers across programs where possible. In particular, Congress should eliminate cost share requirements for some programs and provide agencies authority to waive requirements if they are impeding implementation; provide resources for Tribal consultation; revisit, amend, repeal, or waive Paperwork Reduction Act requirements; and provide agencies with programmatic compliance authority for permitting statutes.

Executive branch dynamics

In September 2022, President Biden signed Executive Order 14082, creating an implementation office within the White House—the Office on Clean Energy Innovation and Implementation, led by John Podesta—that also amended a previous executive order creating the National Climate Task Force.[90]

Executive Order 14082 was broadly consistent with how the White House had approached implementing the American Rescue Plan and the bipartisan infrastructure law. Creating dedicated implementation teams, headed by accomplished senior-level figures, was intended to ensure that progress would continue to be made even if other crises arose that demanded the attention of the leadership of existing policy councils, such as the National Economic Council and the Domestic Policy Council.[91] Executive Order 14082 also outlined multiple priorities for the new Inflation Reduction Act implementation team: investing public dollars effectively, driving progress to achieving climate targets, advancing environmental and climate justice, promoting construction of clean energy infrastructure, increasing U.S. competitiveness and investment in supply chains, increasing high-quality job opportunities, reducing energy costs, accelerating innovation, and effectively coordinating with a wide range of stakeholders.

The Inflation Reduction Act implementation team had some advantages over its predecessors. The bipartisan infrastructure law team, in particular, had tested a number of approaches to soliciting policy input from within the White House, reviewing drafts of program funding opportunities, and organizing the interagency, reducing the need for experimentation by the Inflation Reduction Act team. Passage of the bipartisan infrastructure law had already led to the creation of "Infrastructure Coordinator" positions at most federal agencies, and it was straightforward for those personnel to also manage the flow of information between agencies and the White House about implementation of Inflation Reduction Act grant and loan programs through existing channels.

Shortly after being created, the White House Inflation Reduction Act team took sev-

eral steps to organize implementation of grant and loan programs.[92] It worked with agency staff and other White House teams to agree on a list of "priority programs" for implementation. Priority programs were generally new, had significant funding ($1 billion or more), and required important policy design choices prior to the release of a funding opportunity. These programs would have their notices of funding opportunity (NOFOs) reviewed by White House offices with interests in the particular program prior to release. NOFOs would be circulated by the relevant Office of Management and Budget (OMB) division, with the Inflation Reduction Act team helping manage disputes and ensure timely completion of reviews. Agencies would also present their proposed program design in a virtual meeting prior to sending the NOFO to the OMB, so White House policy council staff could have an opportunity to provide more informal feedback prior to reviewing long, detailed NOFO documents. Dozens of budget lines not deemed priority programs would not be subject to these processes in order to prevent unnecessary bottlenecks.

The Inflation Reduction Act team also set a goal of obligating at least 80 percent of available funds (meaning funds available in fiscal years 2022, 2023, and 2024) by the end of 2024.[93] The goal was communicated to agency leaders during the first meeting of the National Climate Task Force following the signing of the Inflation Reduction Act, and it was intended to help agencies stay on track not only to launch new programs but also to make awards and take steps to protect funds against future repeal or rescission.

However, there was virtually no time—and no internal mandate—for the Inflation Reduction Act team to grapple with more systematic challenges facing implementation. Federal hiring processes were broadly seen as broken, but any ambitious attempt to tackle hiring constraints beyond what had already been explored would take staff time away from decision-making critical to standing up new programs. Implementation at several agencies could arguably have been expedited by creating centralized teams to work on multiple NOFOs, rather than sending responsibility to individual program offices; however, the time it would take to set up such a system could very well have eliminated any benefit. Under existing law, the Office of Information and Regulatory Affairs has the option to delegate PRA approval authority to agencies but is historically reluctant to cede any of its own administrative power, and efforts to push it to do so take substantial time and effort by senior staff.[94]

Moreover, as is frequently the case in the federal government, there were relational tensions between the White House and agencies. Interviewees at multiple agencies, while appreciating that the Inflation Reduction Act team did not waste time by

attempting to reinvent processes, voiced frustration about preexisting White House dynamics and indicated that those dynamics slowed down the pace of implementation. In particular, multiple agencies experienced challenges working with the OMB to review and clear NOFOs, with interviewees citing issues resolving conflicting feedback from different White House policy councils and delays caused by multiple rounds of OMB clearance. Interviewees noted that the Inflation Reduction Act implementation team was ultimately able to intervene to close out most disputes and move programs forward, but agencies felt they lost valuable staff time to "too many people empowered to line edit NOFOs," including nonsubstantive edits such as capitalizing a letter in a word, and "navigating multiple White House offices with edits and comments on a NOFO, without clear guidance to the agencies of who was making the approval decision and whose edits needed to be responded to."[95]

Interviewees also noted that responsibilities for climate and energy policy overall were highly fragmented within the White House prior to the passage of the Inflation Reduction Act, and that the creation of a dedicated implementation team did not resolve confusion within agencies about "where to go" for answers within an opaque White House structure.[96] And many interviewees cited a general unwillingness within the White House to grapple with trade-offs, particularly between speed of implementation and pursuit of other administration priorities, as an issue across the Investing in America agenda, including the Inflation Reduction Act.

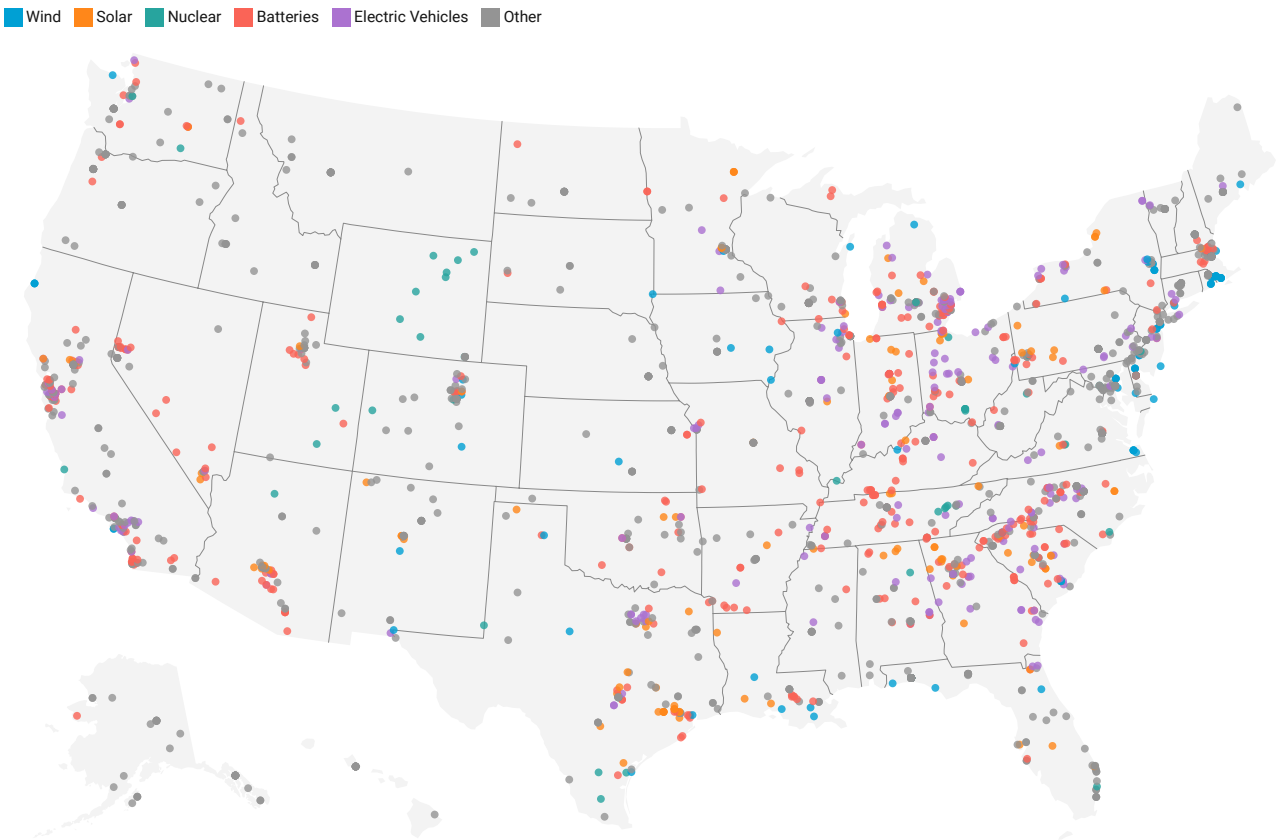
However, it must again be underscored that despite these structural challenges and interagency frustrations, the agencies responsible for implementing the Inflation Reduction Act grant and loan programs overwhelmingly succeeded at the task with which they were set. As the Biden-Harris administration left office, 85 percent of funding available for fiscal years 2022 through 2024 had been obligated by federal agencies. Some agencies, such as the EPA, far exceeded that target, obligating more than 90 percent of all funds appropriated to them under the law. Dozens of new programs had been designed and launched from scratch and awarded all or most of their funds. Preexisting programs that received substantial influxes of funds, such as the USDA's climate-smart agriculture and REAP programs, demonstrated that they were able to absorb the added responsibility and deploy funds effectively.[97] The DOE's Advanced Technology Vehicles Manufacturing Loan Program (ATVM) received expanded authority as to the types of technologies it could support in the bipartisan infrastructure law and expanded financial support in the Inflation Reduction Act to ultimately deploy nearly $35 billion in low-cost debt capital for fuel-efficient vehicle and eligible component manufacturing.[98] Even as many interviewees identified challenges that are important for future policymakers and implementers to learn from and correct, they expressed that work on the Inflation

Reduction Act was among the most rewarding of their careers and were able to cite ongoing improvements in internal decision-making processes over the course of the administration.

FIGURE 1

Historic growth in clean energy investments and projects occurred during the Biden-Harris administration

Nearly $300 billion of investment and nearly 2,000 clean energy projects were announced across the United States



For full access to the interactive data, see the online version of this report.

Note: Note: For the purposes of this report and figure, the underlying Department of Energy data have been edited to exclude "fossil" technology and "public" and "private" distinctions in investment; condense technology types into six categories; and replace the international latitudes and longitudes or missing location of a given project with the capital city coordinates of the state in which it was located in the original dataset. Duplicate rows from the original dataset that contained identical information across cells were also removed, while distinct projects with $0 of announced investment are still reflected in the figure.

Source: U.S. Department of Energy, "Energy Investments Announced Under The Biden-Harris Administration," (last accessed June 2026).

Map: Center for American Progress

Executive branch dynamics important to understanding Inflation Reduction Act implementation can be divided into three categories: structural dynamics, such as conventional federal hiring approaches; cultural dynamics, such as risk aversion among both career staff and political appointees; and dynamics unique to the Biden-Harris administration, including the approaches taken to Build America, Buy America; Justice40; and community benefits plans.

Hiring and personnel dynamics

How the federal government does—and all too often does not—hire personnel posed a major challenge across the board for implementation of the Inflation Reduction Act.

Federal hiring rules

Federal agencies hired thousands of new, highly qualified staff to implement Inflation Reduction Act programs. The fact that so many staff were onboarded within a two-year window is a testament to the hard work of countless managers, HR professionals, and senior leaders. However, hiring was by far the single biggest pain point referenced by career staff. Hiring processes took far too long, placed major demands on the time of critical staff, and at times did not result in the selection of the most qualified applicants.

Federal hiring suffers from several challenges:

- **Poor agency systems and processes.** Interviewees noted that most agencies lack a clearly defined, end-to-end hiring process with deadlines/key performance indicators for each stage of hiring and digital tools to track progress and flag delays. As a result, individual hiring actions can become derailed at multiple points across several handoffs between hiring managers and different HR teams. Additionally, uneven implementation of veterans' preference hiring practices can lead to unstandardized and inefficient hiring processes.

- **Risk aversion.** Career managers are hesitant to make quick hiring decisions because it is notoriously difficult to remove low-performing staff, according to multiple interviewees. As a result, hiring for permanent positions is viewed as a high-stakes exercise, with strong candidates often passed over in the hope of finding a "perfect" candidate who may never materialize. Similarly, interviewees noted that HR staff are hesitant to use innovative hiring strategies due to concerns that future Office of Personnel Management (OPM) audits could find violations of

federal hiring rules or regulations.

- **Term positions.** The OPM attempted to accelerate hiring by allowing agencies to use a special Schedule A authority for noncompetitive term appointments. This authority was first made available for bipartisan infrastructure law implementation and later extended to the Inflation Reduction Act.[99] However, it was underutilized because the two-year term was widely viewed as too short. As one manager noted, "It'll take me six months to train them up, and then after a year they'll leave for their next job. I'd rather focus on hiring someone permanent." The EPA was fortunate to have a separate Schedule A authority for environmental implementation fellows (EIFs), which allowed for two-year appointments that could be extended for an additional two years. This duration was sufficient to attract experts capable of designing and implementing key programs, and the EPA successfully used the authority to hire more than 50 individuals at the General Schedule (GS)-13, GS-14, and GS-15 levels, according to interviews. However, the OPM did not allow the authority to be used for positions below GS-13. As a result, the agency could not fully leverage the authority, particularly in regional offices where few positions exceed the GS-13 level.

- **Classification challenges.** Inflation Reduction Act implementation intersected with a long-running conflict between the OPM and many agencies over the appropriate number of highly graded positions. The OPM has the difficult task of constraining "grade inflation," in which agencies raise grade levels to offer higher salaries and compensate for the federal government's limited ability to match private sector pay for highly specialized work. For example, interviewees noted that EPA HR staff initially insisted that the division director responsible for a new, highly complex $20 billion financing program be classified as a GS-14 (starting salary $142,000) rather than a GS-15 (starting salary $167,000), citing OPM guidance on spans of control. The agency posted the position at the GS-14 level and only received applications from underqualified candidates. The EPA was ultimately forced to redo the classification and repost the position at the GS-15 level, delaying onboarding by several months.

Leadership personnel selections

Political personnel choices were also a key determinant of implementation success. Several key factors in political hiring affected implementation, according to multiple interviews. A future administration should consider these factors when making plans to fill political and career office leadership positions:

- **Speed of hiring political office directors.** Agency offices that onboarded political leaders expeditiously were able to implement more quickly and effectively, according to multiple interviews. Offices that went a long time without political leadership were more risk averse and less likely to implement programs in alignment with administration priorities.

- **Leadership teams with industry, government, and management experience.** Interviewees generally said offices were most successful when the leadership team—between political office directors and senior career leaders—had a balance of aligned industry experience, federal government experience, and a history of managing large teams. Offices with leadership teams that over-indexed on one of these three, or that only had subject-matter expertise but lacked these three characteristics, often ran into issues.

- **Strategic placement of political appointees.** Interviewees noted that in some cases, limited political appointee capacity was not used as effectively as possible. Within program office teams, appointees are most effective at: 1) decision-making and management roles to ensure alignment with administration priorities; 2) putting pressure in key places where processes need to be overhauled; and 3) ensuring visibility and coordination within and across departments. According to

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Personnel selection is one of the most important decisions an administration makes, and getting the right people in the right places should be one of the highest priorities for a future administration. Future administrations should take early steps to lay out a hiring plan with clearly communicated goals and process changes to achieve those goals; address risk aversion in hiring and position classification to speed up hiring of high-quality civil servants; and find solutions to address structural barriers. For political appointees and senior career leaders, future administrations should focus early-term hiring on ensuring that key offices have political directors; ensure that each office has a balance of aligned industry, government, and management experience; and enforce a clear strategy for making sure appointees are additive and effective.

multiple interviewees, appointees who were placed in program offices with roles outside these key functions often were ineffective and caused friction with career staff.

Cultural dynamics

Aside from personnel, there are unique cultural norms in the federal government that affected implementation of the Inflation Reduction Act. In some cases, these norms may be changeable or avoidable—but in all cases they cannot be ignored.

Risk aversion

The federal government is a risk-averse environment. But simply pounding the table and demanding that federal agencies take on more risk, whether in the name of expediting implementation, experimenting with new approaches, or seeding innovative new industries, ignores the unique pressures that agencies must navigate.

Many career federal employees take seriously their responsibilities to spend public dollars wisely, fairly, transparently, and responsibly—and rightly so. No career staffer wants to see a program they worked hard to design and implement be undone by a legal judgment that they failed to appropriately follow the Administrative Procedure Act, the Paperwork Reduction Act, or any of the other foundational laws that govern the operations of the federal government. Moving away from structuring grants on a reimbursable basis could help speed implementation by reducing the burden on external stakeholders to identify operating funds to get projects off the ground but also carries the risk that funds will be misspent and generate political scandals. Inspector General (IG) offices are often run by congressional aides who were recommended for their positions by their former bosses—but IG reports are rarely interpreted by the press or the public as doing anything other than conveying sincere concerns about the risks of waste, fraud, or abuse.

Some interviewees expressed reasonable frustration that, more than 10 years on, the failed solar startup Solyndra was still invoked as a cautionary tale, with one interviewee characterizing the Department of Energy as having a "post-Solyndra hangover" that contributed to a culture of excessive caution.[100] But in important ways, this is a misdiagnosis of the problem. Invoking Solyndra can still generate a risk-averse reaction not because of the substance of anything the Loan Programs Office did but because of the ongoing, roiling political scandal generated by opponents of the Obama administration in general and its pursuit of clean energy in particular. If

agencies don't have confidence that their decisions will receive political top cover by external stakeholders, simply urging greater risk tolerance is unlikely to lead to behavior change.

Most federal grant or loan applications appear to outside observers to function as a black box. Prospective applicants can usually engage with agencies in advance of submitting applications to ask clarifying questions about requirements, but communications are often shut down completely once an application is submitted. Within the Biden-Harris administration, career staff at agencies would not share details about applications with political appointees until after they had completed their review and selection process.

This opaque nature arises from a reasonable set of norms around avoiding favoritism, gaming, corruption, or abuse. But it can also be excessively restrictive. Career staff may not be able to obtain clarifying information from applicants that would help in weighing applications. Prospective grantees often feel frustrated over a lack of transparency in the timeline for review. And where applicants have requested more funds than are available, program teams usually impose percentage-based haircuts to the proposals—sometimes without full knowledge of whether the reduction will render the project unachievable.

Interviewees noted that the Inflation Reduction Act's programs for rural electric cooperatives were able to function somewhat differently. Like many programs, the co-op programs were oversubscribed, meaning the Rural Utilities Service (RUS) received initial funding requests that far outstripped the approximately $12 billion in available funds.[101] But unlike at many agencies, the universe of prospective applicants was extremely well-known to the RUS team, given that the RUS was created nine decades ago specifically to provide financing and other forms of assistance to the nation's rural electric cooperatives, and the agency frequently engaged in technical discussions and financial negotiations with the co-ops.[102] Rather than imposing across-the-board cuts to bring applications within the envelope of available funds, therefore, the RUS team engaged applicants in a dialogue to identify workable, bespoke amendments to individual applications. Interviewees indicated they believe this process enabled them to stretch their limited funds further and enhanced applicants' trust in the new programs.

Future administrations should recognize that risk aversion is a natural and, in many ways, admirable instinct among agency staff who are entrusted with advancing the interests of the American public and wisely spending limited federal resources. Simply exhorting federal agencies to be more risk-tolerant is unlikely to lead to behavior change without external structural supports for taking such actions. Administrations should structurally reward career staff for taking strategic risks and make clear that political leadership will own key decisions.

In contrast, many DOE programs reviewed applications and announced selections without committing to final award amounts or scopes, according to multiple interviews. The agency would then engage in negotiations with selectees in order to finalize the awards, a process that could easily drag out for months beyond the initial application review and selection. This approach meant that it took longer for awardees to begin work on projects.

Case study: EPA Community Change Grants Program

The Inflation Reduction Act tasked the EPA with building an entirely new $3 billion environmental justice grant program to tackle long-standing and life-threatening pollution and climate challenges in disadvantaged communities.[103] Like the rest of the Inflation Reduction Act, the program faced an aggressive implementation timeline. It also had the added challenge of designing a competition that was accessible to smaller community-based organizations, had broad buy-in from local communities, and could manage a large volume of applications for relatively smaller grants.

Despite these challenges, the program received a highly positive review from the EPA's Office of Inspector General (OIG) following a programmatic evaluation conducted during the Trump administration.[104] The OIG focused specifically on a subsection of the Community Change Grants competition, which was responsible for about $1.5 billion in finalized awards. Across five selection rounds, 167 reviewers evaluated approximately 400 eligible applications and completed roughly 1,200 scoring sheets. The process ultimately produced a ranked list of projects from which EPA leadership selected 80 awardees.

According to the report, the program adhered to federal grant competition requirements, established clear evaluation criteria, documented selection decisions, and created safeguards beyond those required by policy. These additional

safeguards included reviewer training, conflict-of-interest certifications, panel deliberations to reconcile divergent scores, and senior advisory briefings prior to final funding decisions. The Inspector General concluded that the agency "implemented effective controls" and identified no issues requiring corrective action—a rare outcome for a federal program audit.

The program's trajectory changed abruptly in 2025, when the Trump administration moved to terminate the grants and Congress rescinded unobligated funds through subsequent legislation, cutting off essential public health, safety, and cost-saving benefits to communities.[105] But the Inspector General's review provides a clear record of what occurred during the program's brief window of implementation: Within just two years, EPA staff designed and executed one of the largest competitive environmental justice grant programs in the agency's history, doing so in a manner that federal auditors later found to be fair, transparent, and consistent with federal grant management standards.

Deference to career staff

The administration relied heavily on career officials for implementation both out of necessity and as a strategy for creating greater buy-in and program durability. Interviewees at multiple agencies noted that some of the Inflation Reduction Act's biggest implementation successes stemmed from creative, determined, and dedicated career officials who deployed their programmatic, legal, or operational expertise to innovate simpler, faster, and fairer ways to build capacity, deploy funds, and accomplish program goals. There were also examples, however, where career officials' focus on rigid process, fear of change, or overburdened workloads limited progress. In interviews regarding implementation barriers, agency officials mentioned a "lack of urgency," "culture of compliance over outcomes," or a tendency for agency staff to "focus on their limitations" rather than a problem-solving, outcome-oriented mentality.

For example, to make use of expertise and build durability, the White House required that the Office of Management and Budget review spend plans, major funding notices, and press releases. Several interviewees pointed to this process as a major source of delay, especially early in the implementation process. As one USDA official put it, "OMB and OIRA went back and forth with us on NOFOs and program design and as a result we lost weeks and weeks because of minor questions or concerns and that forced us to waste time scheduling calls" in order to reach resolution and move forward. As another example, an Interior official identified the rigid standards one bureau set for certifying contract awarding officials as a significant

bottleneck to getting funding out the door. These standards, and the resulting personnel shortage, were not required by statute or regulation but rather the bureau's decision, after decades of being hammered on compliance, to prioritize compliance over program outcomes.

Political leaders failed in their efforts to change course. Agencies had many similar examples in engaging with program, operations, and general counsel office staff around hiring, obligation, contracting, and procurement practices as well as the legal requirements for program design and implementation. Many interviewees noted that substantive and creative operational experts as well as leadership's support and encouragement will be that much more important the next time around given agencies' decimated ranks.

A future administration may be able to avoid or more quickly overcome these kinds of barriers by: 1) having career or appointee experts available to implementation leads who can take on recalcitrant or reluctant career programmatic and legal staff on the merits of their concerns and provide implementation leaders with alternative solutions that are concrete and legally and practically viable; 2) identifying and replacing key leaders early who are not likely to be aligned with the administration's outcome-oriented approach; 3) having agency leaders clearly lay out desired outcomes, not just to political leadership but also to key career program and operations leaders, and then regularly model problem-solving and reward risk-taking; and 4) where the administration chooses to include career officials for purposes of buy-in, political leaders monitoring closely and being more willing to step in and move a process forward when it gets mired in debate over program design and priorities, whether that is between the OMB and an agency or agency leadership and program staff.

DOI Tribal Electrification Program; EPA Clean School Bus Program

Tribal energy and electrification needs are significant. An estimated 17,000 Tribal homes are unelectrified, Tribal communities experience more than six times as many electricity outages per year as the national average, and Tribal land residents face an average energy burden that is more than 28 percent higher than that of the average U.S. citizen.[106] The Inflation Reduction Act provided the Department of the Interior with $150 million for a new Tribal Electrification

Program to address this need by increasing the number of Tribal homes with access to clean, reliable, affordable electricity. Interior officials made an early decision that effective implementation required new expertise and brought on power systems construction experts via contracts who enabled the department to move quickly to establish an effective program. Those experts were also able to provide technical assistance to Tribal applicants on the front and back ends of the process, anticipating and solving problems with applications and projects, according to interviews. As a result, the department issued all $150 million in funding through two rounds of grants for planning and implementation, reaching 23 Tribal communities over just 18 months.[107]

Deference to existing program processes and career teams can make sense when three criteria are met: 1) The new program is similar to an existing program; 2) Implementation responsibility is situated within a high-performing team; and 3) That team has capacity to prioritize implementation. The EPA's $5 billion Clean School Bus (CSB) Program, funded through the bipartisan infrastructure law, is a good example of this working well. The CSB Program was assigned to the EPA's Office of Transportation and Air Quality (OTAQ) within the Office of Air and Radiation, which had extensive experience running the similar Diesel Emissions Reduction Act (DERA) Program.[108] Within OTAQ, the CSB Program was assigned to a highly experienced career staff and, critically, this was a separate team from the individuals within OTAQ leading the highly complex and demanding light- and heavy-duty vehicle regulations. Drawing on their DERA experience, this team quickly designed a one-page digital rebate application and launched the application just six months after the law was signed into effect. In October 2022, less than a year after bill passage, the EPA selected 389 applications totaling $913 million to support the purchase of 2,463 clean school buses in all 50 states, Washington, D.C., and several federally recognized Tribes and U.S. territories.[109] The team went on to successfully run several more rounds of the program.

Balancing administration priorities

The Biden-Harris administration entered office with a broad set of goals—including creating more well-paying and union jobs; addressing long-standing structural injustices, including environmental injustices; onshoring manufacturing; increasing investment in underserved communities; and combating climate change, among others. These multiple goals were reflected in the breadth of programs enacted through the Inflation Reduction Act and other marquee legislative accomplishments. They were also reflected in the administration's internal approaches to implementation.

Contrary to some prominent public commentary, and as discussed throughout this report, Inflation Reduction Act programs were implemented at speed and in ways that advanced these priorities alongside robust emissions reductions. In multiple instances, agencies were able to successfully design programs that advanced multiple priorities to high-value projects in record time. However, that does not mean that trying to advance multiple priorities within single programs is costless in terms of speed, resources, or programmatic reach. Trade-offs are real, and political leaders must face them honestly and make decisions about what to prioritize as early as possible in implementation—and then stick to those decisions. Interviewees shared many valuable reflections on where a failure to resolve trade-offs, particularly in relation to administration goals and initiatives, created challenges to expedient implementation that future administrations should bear in mind when trying to create crosscutting, value-promoting processes.

Build America, Buy America (BABA) and the Made in America Office (MIAO)

Certain federal infrastructure programs, particularly those focused on surface transportation, have long had "Buy America" requirements attached to the use of federal funds.[110] Virtually no surface transportation infrastructure in the United States is privately funded, and funding for highways is subject to regular, multiyear appropriations cycles—creating certainty that requirements to source concrete, steel, or other basic construction materials from American manufacturers will generate substantial ongoing demand for those products.

The bipartisan infrastructure law created a new standard called Build America, Buy America, which generally required that all iron, steel, and construction materials in a project be sourced from the United States—and further, that greater than 55 percent of the cost of all "manufactured products" in a project be American-made.[111] Like the Buy America program administered by the Department of Transportation, BABA created a waiver process for projects that could not reasonably meet the statutory requirements. BABA was not imposed as a congressional requirement on grant programs in the Inflation Reduction Act; however, political pressure made it all but impossible to refuse to incorporate BABA into Inflation Reduction Act programs.

From the beginning, BABA implementation was fraught with challenges. Given the crosscutting nature of the requirement, the new office tasked with overseeing BABA—the Made in America Office—was housed at the OMB.[112] Interviewees noted it took months to hire sufficient staff to manage such a sprawling mandate and to set up processes for considering programmatic standards and waiver requests. While

the idea of requiring a certain percentage of content to be made in America and final assembly to take place in the United States seems straightforward in principle, applying such a standard across diverse technologies is anything but.

Here are just a few questions that frequently arose in implementing BABA:

- How far upstream in a supply chain do you need to look to determine whether a manufactured product meets content requirements?
- Is it different by product type, and if so, how so?
- If no products meeting the BABA standard are available, should the administration issue a blanket waiver, or does that eliminate any incentive to shift supply chains?
- What if there is some supply of BABA-compliant products, but not enough to fulfill orders across a multibillion-dollar federal program?
- Is it fair if sophisticated grant applicants who can afford to hire BABA consultants are able to move projects forward, while Tribal and underserved communities that may need federal investments the most move to the back of the line?

Across interviews, agency staff identified a few common challenges with BABA implementation. First was an original failure to identify a more limited set of priority products, technologies, and inputs where onshoring supply chains would contribute to boosting U.S. economic competitiveness on an ongoing basis. Instead, the default posture was to try to onshore everything, everywhere, across diverse supply chains while issuing narrow, tailored, often project-specific waivers only when necessary. This had the effect of making each waiver a battle internally—and often a lightning rod externally. Second, interviewees noted that MIAO staff mirrored some of the most micromanagerial tendencies of other OMB staff, requesting repeated, duplicative rounds of information or even demanding data that did not exist prior to signing off on decisions, slowing program implementation and creating substantial burdens on the agencies to produce additional analysis. Third, according to interviews, the decision-making process for finalizing waivers was opaque and unpredictable and MIAO staff frequently attempted to reopen previous decisions, potentially in response to external political pressure.

In interviews across multiple agencies, the bipartisan infrastructure law's BABA standard was identified as one of the most substantial barriers agencies faced to expedient program implementation and as a significant source of uncertainty for grantees.

Justice40

The Justice40 initiative was implemented by the Biden administration through Executive Order 14008, "Tackling the Climate Crisis at Home and Abroad," signed in January 2021.[113] It arose from a campaign promise to ensure that the benefits of federal infrastructure spending reached disadvantaged communities, where unfair housing, infrastructure, and other policies have caused economic insecurity and undermined quality of life.[114] Industrial sources of toxic chemicals and pollution have also historically been concentrated in underserved communities, endangering the health and safety of residents. Community and environmental justice advocates have long advocated for solutions to address the harms of unfair policies, including a history of federally funded infrastructure and other projects that decimated homes and businesses and cut off low-income, Black, and Latino communities from economic opportunities. The Biden administration recognized these injustices and, with input from environmental justice stakeholders, sought to remedy them through the executive order by directing that at least 40 percent of the overall benefits of certain federal climate, clean energy, and infrastructure investments flow to disadvantaged communities. There were more than 500 programs covered by the Justice40 goal across 19 agencies.[115]

Interviewees noted that requiring career staff to incorporate goals related to disadvantaged communities often helped productively reshape NOFO design, outreach priorities, and the assessment of applications, as well as helped direct more funds to the places that needed them most. In particular, deliberate and thoughtful outreach to environmental justice stakeholders and front-line communities generated first-time applications and awards to worthwhile and beneficial projects across multiple agencies. However, most interviewees who discussed Justice40 also expressed a belief that this outcome could have been accomplished in a way that created fewer data burdens on agencies and less political controversy among stakeholders.

The effort to create one integrated system of accounting to track benefits delivered and progress toward the 40 percent goal encountered myriad challenges that resulted in detailed methodological debates that themselves had limited benefits for intended communities and engendered significant backlash from different constituencies. Some examples of challenging questions that agency and White House staff had to answer included:

- **Which programs count?** The OMB and the Council on Environmental Quality led a process to identify which federal programs would count toward agencies' efforts to achieve their Justice40 goals. Some of these programs, such as infrastructure

grants for carbon capture and hydrogen production facilities, are deeply unpopular among many environmental justice stakeholders and communities because of concerns that they could prolong the life of polluting fossil fuel infrastructure. At the same time, certain communities—such as fossil energy communities that also met the Justice40 disadvantaged community criteria—may be supportive of such programs.

- **How does the government assess a project that has localized trade-offs?** Many projects have positive and negative externalities. For example, the EPA issued many grants and loans for sewage treatment upgrades.[116] In most cases, these upgrades provided benefits to the surrounding community, such as through lower operating costs or better water quality. At the same time, the local community may not appreciate the very existence of the facility in their community given noxious odors and impact on their property values. Do these upgrades count toward Justice40?

- **Should the government measure based on location of investments or location of the benefits?** In many cases, the location of an investment did not capture who benefited. Upgrades to transmission infrastructure benefit everyone in the regional power grid, while upgrades to a dam protect everyone downstream from flood risk. Further complicating factors, sometimes the local community opposes an infrastructure investment in their backyard that benefits many communities in the surrounding region. How much should these types of projects count toward Justice40? Credible arguments can be made from 0 percent to 100 percent.

By linking hundreds of billions of dollars to one definition,[117] Justice40 generated significant anxiety in communities that were reasonably fearful of being left behind.

The inherently subjective nature of these decisions, combined with the perceived winner-takes-all structure, led to a significant and prolonged advocacy campaign by a broad set of constituencies that receive federal funding. The intense efforts to influence the Justice40 definition and resulting maps demanded significant time from senior leadership. For instance, the authors can recall multiple instances when senior staff needed to explain to elected officials why certain communities with meaningful public health, economic, or environmental issues did not meet the definition. The long-running debate over definitions also created unfortunate schisms within the progressive community and provided opportunities for opponents of the program to broadly mischaracterize it.

Labeling projects as part of Justice40 also made them easier targets for an adver-

sarial Congress, and later the Trump administration, which was intent on identifying and undoing programs that it believed to be primarily focused on minority communities. Justice40 was a common theme in oversight committees under Republican control, and formed the basis for identifying hundreds of grants that were terminated by the Trump administration.[118]

Future administrations should continue to prioritize and dedicate significant time and energy to ensuring that federal investments reach the communities with the greatest need. Based on the interviews conducted and the authors' personal experiences, future efforts should take a diverse approach. Every program should develop a clear strategy to reach high-need communities with input from community-based groups, and those strategies should be vetted by senior agency leadership and, for the largest programs, by the White House and the OMB. However, future teams would be well-served by recognizing the benefits of having different programs focus on different types of disadvantaged communities, rather than imposing across-the-board mandates.

Community benefits plans

Some agencies chose to require that grant applicants—particularly those from the private sector—submit community benefits plans as part of their application process.[119] These plans generally required applicants to provide information on how they planned to recruit, train, and compensate workers on the project or at the facility; to detail their community engagement practices; and to identify equity considerations related to their project and how they intended to mitigate them. The practice was generally required at the Department of Energy, and the Rural Utilities Service adopted a similar approach, with the addition of "farmer benefit plans," for its programs supporting rural electric cooperatives.

Interviewees were in general agreement that the practice of requiring community benefits plans from private sector applicants not only provided valuable information for evaluating applications but also pushed companies to be more ambitious than they would have been on their own. Several interviewees reflected that the community benefits plan process led to some significant progress on workforce and labor issues, including commitments to either enter into contracts with labor unions outright or to maintain neutrality agreements.[120] Many interviewees felt the effectiveness of community benefits plans for addressing environmental justice and equity considerations was more limited, as there was more iteration around those topics that often led to less clarity and delays.

However, interviewees also identified challenges related to how community ben-

efits plans were implemented that should be taken into consideration if a future administration is interested in reviving the approach. First, many project applicants expressed frustration at the granularity of metrics and reporting that became required over time as part of the plans, and interviewees acknowledged that these requirements could likely be streamlined and simplified without losing the value of the approach. Second, interviewees acknowledged that community benefits plans were a key area where the administration could be accused of "moving the goalposts." What was expected of applicants changed over time and created confusion among prospective grantees about what would be "good enough." This challenge easily could be mitigated by setting fewer, clearer, and more consistent metrics for success at the outset of requiring submission of community benefits plans and providing considerable advance notice and the opportunity for applicants to comment on proposed revisions to the metrics prior to any substantial changes.

Future administrations should set clearer, higher-level goals; provide more deference to agencies on implementing these goals; and engage in less proceduralism, prescription, and incrementalism when embedding values into programs. Future administrations can advance environmental justice, job quality, and domestic manufacturing goals with simpler requirements and less reporting burden on applicants and agencies.

External dynamics

No law is passed—or implemented—in a vacuum. Nonfederal actors are key at every step of the process, from providing input to shape program designs, to communicating about administration actions, to drawing down funds to make projects happen in the real world. Absent a radical change in approach where the federal government takes on more direct responsibility for delivering infrastructure projects outside of a military context, external dynamics will continue to play an important role in shaping the success or failure of program implementation.

Grantee readiness and capacity

Because the federal government largely does not build infrastructure directly, speedy implementation of Inflation Reduction Act grant programs depended on having a pool of applicants who had projects in mind and had the capacity to put together a compelling application for limited resources. Most Inflation Reduction Act grant programs were oversubscribed—meaning they received requests for more funding than was available to award. However, interviewees cited unmet technical assistance needs from recipients as a common issue throughout implementation and at all agencies.

Applying for or accepting federal funding and meeting compliance requirements once a recipient wins federal grant funding are complicated. Interviewees noted that at every information session throughout the implementation process, all categories of recipients for all kinds of programs asked for more technical assistance in order to apply for, receive, and spend funding in a timely and impactful way. Many agencies used funding from annual appropriations to provide technical assistance to grantees, and some philanthropies stepped up to help underserved communities and low-capacity applicants effectively compete for funds, yet technical assistance needs from many applicants remained unmet.

Community Wildfire Defense Grant program

Created in the bipartisan infrastructure law, the new $1 billion Community Wildfire Defense Grant program employed a number of successful efficiencies and engagement innovations. Interviewees recounted multiple innovations, which included developing a governance structure that included agency, state, and Tribal experts who developed the clear criteria and reviewed proposals, splitting funding into two rounds that allowed for improvements based on stakeholder feedback, and hiring a consultant to find technology improvements and process efficiencies so that, according to the interviewee, the second-round application took only 90 minutes to complete. Most relevant, the program hired community navigators who worked with communities to understand what they could ask for, what the application windows were, how to write a proposal, and more. With this support, the number of low-capacity communities receiving grants was much higher than comparable programs, reaching 34 percent of funding[121] compared with, for example, the Federal Emergency Management Agency Building Resilient Infrastructure and Communities (BRIC) program directing just 4 percent of its funding to low-capacity communities.[122]

After the second Trump administration took office and attacks on obligated grants mounted, many nonprofit grantees were unaware that they could contact their members of Congress about the projects they were planning to pursue with their grant awards and ask for their support without endangering their not-for-profit status, according to interviews. It became evident as well that many grantees had never informed their elected officials at either the federal or state level that they had competed for and won federal awards prior to the 2024 election, making the task of 501(c)(3)-compliant educational outreach after the inauguration seem even more daunting. Grantees need to know how to advocate for themselves not just in competing for funds but also in building public support for their activities.

Challenging communications environment

Much has been written elsewhere about the rapid changes in how the public accesses news and information. It is clear that the Biden-Harris administration struggled to adapt to these changes across the board in ways that negatively affected public perception of the administration's accomplishments, including around Inflation Reduction Act implementation. In particular, the administration's position that federal agencies could not have a presence on TikTok, a platform widely used by younger Americans,[123] created a substantial communications gap and information vacuum.[124] Interviewees also noted that many social media communications were subject to multiple layers of review and approval inside agencies and the White

House, creating a slow and inorganic style on platforms where users value authenticity, timeliness, and dynamism.

A few communications challenges may prove to be unique to the Biden-Harris administration. Domestic travel by White House principals and Cabinet officials in the first year of the administration was sharply curtailed by the ongoing COVID-19 pandemic and the administration's desire to model good public health practices while vaccines were still rolling out. However, this meant that by the time travel was considered safe, there was no muscle memory at many agencies for planning and executing events and public engagements outside Washington. While some agency leaders were enthusiastic and frequent travelers, others remained reluctant throughout and needed to be pushed to travel by the White House.

However, some dynamics may prove lasting. The White House struggled to attract ongoing public attention with conventional tactics, such as planning all-hands "Investing in America"-themed tours that sent Cabinet officials across the country to share the administration's accomplishments. Interviewees noted that attempting to line up multiple principals for coordinated travel often created scheduling bottlenecks and argued that more frequent, organic, ongoing travel may have been a better use of resources.

Other communications dynamics could be overcome with better coordination and external support. Interviewees noted that agency counsels' offices held a view that the administration could not produce social media toolkits for use by external partners to promote award announcements or other actions; revisiting this opinion could help increase public awareness of administration accomplishments in the future. Stakeholder groups were also often publicly critical of administration actions when they fell short of full alignment with advocates' positions, even if the action demonstrated a meaningful improvement over the status quo. This was arguably a counterproductive strategy, given the drumbeat of right-wing media criticism that forms a constant undercurrent in today's political environment, ultimately overshadowing the Inflation Reduction Act's benefits and reinforcing the misconception that the policies are unpopular.[125]

Interviewees also worried that the administration focused its efforts on traditional venues that no longer reach target audiences. In one example, an interviewee suggested a focus on ribbon cuttings at remote water, energy, or park project sites meant the administration was repeatedly speaking to an insider crowd when it may have been more successful if it had held events at traditional gathering spots in churches, community centers, or other places that were more conveniently located.

Another pointed to administration concerns with engaging nontraditional media influencers and podcasters who may promote a range of complex views, some of which might be at odds with administration policy.

External partners should invest now in building a progressive communications ecosystem that is upstream of politics, mirroring the right's investment over decades in building trusted allyships can be rapidly mobilized in support of administration actions. Advocacy organizations should also invest in updating their communications strategies to emphasize driving messages and engagement on digital and new media platforms rather than solely in traditional media outlets, which no longer reach significant segments of the American public.

Partner relations and trust

The Inflation Reduction Act contained a number of programs whose intended recipients were private sector companies, rather than public sector or nonprofit entities. These grant and loan programs were concentrated at the Department of Energy, although a more limited number were housed at the Environmental Protection Agency and the Department of Transportation.[126] In general, these programs aimed to support private sector actors in making major investments that would enable and accelerate an economic transition to clean energy sources, from retrofitting automotive factories to make electric vehicles to funding major expansions and improvements of transmission infrastructure. Historically, the non-nuclear components of the DOE primarily focused on research and development and some small-scale demonstrations. The infusion of tens of billions of dollars for private sector actors to develop commercial-scale projects represented a substantial expansion of the agency's mission and required new skills and expertise to engage, build trust, and responsibly learn from private sector actors.[127]

Building these relationships took time, and trust was hard-won. Many companies that ultimately competed for and won federal grants under the Inflation Reduction Act and bipartisan infrastructure law had little to no experience managing federal grants or loans, while many grant officers previously had limited exposure to the private sector, according to multiple interviews. Extensive diligence processes and opaque timelines for companies seeking support from the Loan Programs Office proved an ongoing sore spot, given the large increase in loan volume. Over time, the

DOE and other federal agencies grew increasingly adept at engaging with, soliciting program design input from, and responsibly reviewing applications from private sector actors, and many companies likewise grew to trust and appreciate the expertise of their federal counterparts. Interviewees noted that the department's efforts to build trust led to a much wider range of awardees, including industry-leading companies, which was a marked change from the American Recovery and Reinvestment Act programs.

However, the Trump administration's potentially unlawful actions to terminate federal contracts and awards and interfere in federal permitting processes have substantially undermined this progress. Increasingly, companies are canceling projects that previously received federal support, while promising startups are laying off staff.[128] Future administrations will need to prioritize rebuilding positive relationships with the private sector around clean energy programs early on in order to avoid costly implementation delays.

Trade associations should work now to identify measures that could help recreate trusted relationships between aligned industries and the federal government around clean energy investments and prioritize communicating those steps to future administrations and, where appropriations may be required, to Congress.

Recommendations for policymakers and external stakeholders

The question of whether most Inflation Reduction Act programs will deliver the benefits they intended is unanswerable today—largely because the fate of many programs remains tied up in litigation after the Trump administration's extraordinary efforts to cancel obligated, contracted awards. However, interviewees' experience of the 29-month effort to make the Inflation Reduction Act a reality, combined with the authors' own observations, leads the authors to a set of recommendations for future policymakers, implementers, and stakeholders.

Recommendations for Congress

- **Embrace the portfolio approach and avoid creating too many fragmented programs to achieve speed.** After building and spending the political capital necessary to enact major legislation, members of Congress and administrations reasonably want to see results as quickly as possible. One way to do that is to increase funds available to high-performing existing programs, as in the examples of the Urban and Community Forestry Program and the Rural Energy for America Program. But where there are no federal programs well-suited to achieving a given policy goal, creating fewer but more flexible new initiatives is more likely to lead to success than creating several similar, smaller programs. For instance, rather than creating multiple new programs for state energy offices, Congress could create a larger, formula-funded program that provides flexibility for states to pursue multiple kinds of interventions based on their needs and capabilities.

- **Resist the urge to dictate activities.** Implementation challenges can be difficult to predict in advance. While it is appropriate and helpful for Congress to specify program goals and broad requirements, such as making grant programs only available for zero-emission technologies, enacting constraints on aspects of program design via legislation hamstrings agencies' ability to navigate implementation challenges as they arise. Congress should resist the urge to micromanage program design, from specifying a minimum number of awards to

limiting the use of funds to only highly specific technological applications, or risk having federal resources go unused.

- **Allow agencies to waive or reduce matching requirements.** Many federal grants require recipients to demonstrate that they have their own funds available to pay for part of a project. However, these matching requirements can put federal funds out of reach for low-capacity and low-income grantees that could stand to benefit the most from federal investment. And some states follow multiyear budget cycles that make it impossible to compete for one-time funds. Where agencies had authority to waive or reduce matching requirements on a program-by-program basis, more low-income and Tribal grantees were successful in applying for and receiving funds.

- **Appropriate funds for administration, staffing, technical assistance, outreach, and engagement.** Many federal agencies, especially energy and environment agencies, have been operating on a shoestring budget for years. Funding the operations of the federal government may not be a political slam dunk, but policy initiatives do not implement themselves. Where Congress provided funding for administrative activities such as permitting, agencies were able to realize improvements quickly. Policymakers should see this as a success story and explicitly include appropriations for program administration, crosscutting activities such as permitting support, building and delivering technical assistance tools for grantees, and conducting outreach and public education as part of future legislative packages.

- **Waive or reform burdensome administrative requirements.** In addition to prioritizing flexibility in program design, Congress should identify opportunities to give agencies more flexibility in how they operate. Federal hiring is widely recognized as broken; if broad reforms are politically infeasible, then Congress should expand the availability of direct hiring authority, particularly to support implementation of priority policy initiatives. The Paperwork Reduction Act is a contradiction in terms and should be substantially reformed or broadly waived. And while permitting reform is beyond the scope of this report, responsible reforms could expedite project delivery.

Recommendations for future administrations

- **Implement an operations agenda from Day One.** A new administration should come into office with an operations agenda, a strategy and tactical playbook for how to mobilize federal resources and reform federal practices to deliver on the administration's agenda and generally help the federal government deliver. This plan—as well as administration wide and agency leadership to implement it—will be that much more critical given the decimated state of federal agencies.

- **Standardize and streamline NOFO processes.** Agencies don't have to wait for major new legislation to pass to improve how NOFOs are written and released. Creating standardized, plain-language NOFO documents and identifying ways to streamline NOFO approvals and application reviews can improve performance of existing programs just as much as new ones. A future administration should make improving NOFOs an early government reform priority.

- **Hire aggressively, ambitiously, and quickly.** A future administration should take office with an aggressive plan for hiring new career staff and reinstating high-performing departed career leaders and staff. The OPM should provide maximum flexibility and discretion to agencies to rebuild the capabilities of the federal government to deliver programs and services.

- **Reduce or avoid self-imposed administrative burdens.** Any future administration is going to deal with even greater capacity constraints, following hundreds of thousands of reductions in career staff across agencies.[129] This means creating internal decision-making systems that avoid churn between the OMB and agencies, that reduce the administrative burdens of compliance with BABA, and that avoid imposing onerous new data collection burdens.

- **Structure competitions to demonstrate rapid progress.** Where possible given time constraints, agencies may consider conducting competitions in stages. For instance, a first competition could provide implementation awards only to projects that can deliver on a 6- to 12-month time frame and make planning grants available at the same time to longer-term or more complex projects. The second round could be made available only to projects that received planning grants and used them effectively to identify ways to speed project delivery. Rolling application windows should be avoided, as the added administrative burden has been shown to slow applications and award decisions. Where possible, agencies should prenegotiate changes to project proposals with applicants based on available funds prior to making award decisions, avoiding time-consuming haircut processes on the back end.

- **Use the White House wisely.** Effective White House policy leadership can promote better coordination and alignment across multiple, similar programs operating at different agencies, including by issuing timely and clear guidance. Effective White House leadership also can—and should—be leveraged to resolve policy disputes and maintain accountability to deliver programs on time.

Recommendations for external stakeholders

- **Be loud, consistent champions.** External supporters of ambitious policy change should be active in trying to shape the information environment in which implementation is taking place—because opponents certainly are. Given the distributed nature of benefits from federal investments, as well as the fact that private companies have little incentive to tout the role of federal policy in their investments, vocal support from other stakeholders is critical to ensure that the public can trace local benefits to federal policy change. While stakeholder pressure on implementation decisions can be useful, public criticism of programs makes it much more difficult for the successes to break through. Stakeholders should promote implementation successes and impact on the Hill, with local leaders, and elsewhere as emphatically as they did the need for funding in the first place.

- **Counter the right-wing echo chamber.** Over the past several decades, conservatives have built a media ecosystem dedicated toward moving Americans to the right ideologically by making sustained, targeted investments in traditional media and new media such as podcasts and social media influencers. Through this network, they are able to reach millions of people daily, shaping their fears, values, beliefs, and who they trust.[130] These investments have paid dividends; in fact, the right-wing media ecosystem shapes culture—what people believe and feel and, ultimately, how they vote. The left has been unable to counter this due to a lack of investment, the tendency to be reactive, and an inability or unwillingness to understand the new media landscape. Philanthropies, investors, and others must make investments now to counter the right and build a progressive media infrastructure that shapes culture and beliefs and moves people toward action. To build a durable media ecosystem, the left needs to move away from one-off campaigns and talking points toward investing in talent, storytellers, influencers, and other trusted voices to build out the ability to engage and resonate with more people.

- **Invest now in grantee readiness.** Philanthropies and other funders should invest now in low-capacity grantees to bolster their ability to apply for federal grants and

other programs. As mentioned, applying for federal funding is a complex process, and many local governments, states, Tribes, and some nonprofit organizations do not have the capacity or expertise to navigate it, nor the budget to hire staff to navigate it. To be able to compile a competitive application for funding, these entities need financial support now to build up their capacity and technical expertise.

- **Invest now in building capacity for future implementation.** Philanthropies, universities, and nonprofit organizations played valuable roles in supporting implementation of the Inflation Reduction Act. However, in many cases, this support came relatively late in the process as various actors sought to identify specific points of intervention or leverage. Philanthropies should invest now in building capacity for project delivery—especially for low-capacity actors such as Tribes, territories, and states—compliance support, training, and support for external engagement and communications for prospective grantees, and effective communications campaigns that reach people where the federal government may not be able to do so. That kind of campaign effort includes educating the public about the benefits of these investments and creating demand for more of these investments in the future. This is also a prime window to identify specific state-level barriers to implementing ambitious federal policy, from state procurement requirements to restrictions on land use.

Conclusion

The Inflation Reduction Act was a massive undertaking mobilizing thousands of staff across the federal government and even more resources from states, cities, Tribes, nonprofit organizations, and private sector companies who sought to utilize its programs and provisions. Federal agencies largely succeeded at the task they were given, creating dozens of new programs from scratch and obligating more than 80 percent of available funds prior to the end of the Biden-Harris administration.[131] The extraordinary and potentially unlawful actions of the Trump administration to cancel contracts, rescind obligated funds, interfere in federal permitting processes, fire federal employees, and otherwise disrupt implementation make it unfortunately impossible to judge the real-world impact of many of the investments made by the Inflation Reduction Act's grant and loan programs. Given ongoing litigation, it is unclear whether the courts will enforce the terms of the Consolidated Appropriations Act, the Administrative Procedure Act, and other foundational statutes, or whether they will allow the Trump administration to effectively undermine the full faith and credit of the U.S. government by rendering contract law moot with regard to federal actions. That makes it even more important that Congress, future administration officials, and stakeholders take lessons from what statutory provisions, administrative structures, and external supports enabled better and more rapid implementation of the Inflation Reduction Act as well as understand which measures hindered the Biden-Harris administration in its efforts and apply them thoughtfully to any future efforts.

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