



**BLUEGREEN
ALLIANCE**

Revisiting Federal Implementation Efforts:

Job Quality and Community
Benefits under the Bipartisan
Infrastructure Law, CHIPS
& Science Act, and Inflation
Reduction Act

INTRODUCTION

The BlueGreen Alliance (BGA) strongly believes that the Bipartisan Infrastructure Law (BIL), the CHIPS and Science Act, and—in particular—the Inflation Reduction Act hold the transformational potential to reduce pollution, prevent the worst impacts of climate change, secure and reshore critical manufacturing supply chains, and create the good-paying union jobs we need to give all workers in the United States the opportunity for a middle-class life. We commend the administration’s efforts to ensure that implementation of these historic laws lifts up workers and communities as agencies develop programmatic requirements and guidance to implement them. But more needs to be done, as this analysis details.

Federal agencies continue to play a crucial role in uplifting workers and communities as they develop programmatic requirements and incentives to implement BIL, CHIPS, and Inflation Reduction Act investments. In parallel, the Biden administration has laid out clear commitments to maximize the job quality, equity, and community benefits of these laws and other federal spending through executive orders and initiatives. The president and his administration are seeking to deliver on their commitment to working people by advancing high road labor standards and securing worker rights and protections through policies such as [Executive Order 14063](#) on Project Labor Agreements (PLAs).¹ In line with this commitment, the White House Task Force on Worker Organizing and Empowerment also recommended that a priority action item for agencies is to “ensure that federal grant funding has strong, job quality standards...”²

To build on the administration’s commitment to create and improve access to high quality jobs, the White House National Economic Council and U.S. Department of Labor (DOL) established the [Good Jobs Initiative](#).³ The initiative starts from the premise that good jobs are the foundation of an equitable economy that lifts up workers and families while making businesses more competitive. Through the Initiative, DOL worked with the U.S. Department of Commerce (DOC) to create eight [Good Jobs Principles](#) to establish a shared framework of job quality for workers, businesses, labor unions, advocates, researchers, and state and local governments. DOL also partnered with the U.S. Department of Transportation (DOT), the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), the U.S. Department of Interior (DOI), and DOC through Memoranda of Understanding (MOUs) to continue supporting the creation of high quality jobs.⁴ Federal agencies that have not already entered into MOUs with the DOL to support this effort should do so.

Indeed, in the Inflation Reduction Act itself, Congress created a funded mandate for the administration to track the implementation of labor, equity, and environmental standards across the law’s many programs. Section 70005 of the law appropriates \$25 million to the U.S. Office of Management and Budget and Section 70004 appropriates \$25 million to the U.S. Government Accountability Office to assess “whether the economic, social, and environmental impacts of the funds...are equitable.”

In our previous May 2023 analysis—[Best Practices for Implementation: How the Lessons from the Bipartisan Infrastructure Law Can Ensure the Inflation Reduction Act Delivers Good Jobs and Community Benefits](#)—BGA identified opportunities for agencies to achieve the Biden administration’s goal of ensuring workers and communities see the benefits of BIL investments while creating good union jobs. This report will revisit some of these BIL programs to measure progress against the Good Jobs Principles and metrics from our 2023 report. Additionally, this updated report reviews more recent guidance and funding opportunities for CHIPS and Inflation Reduction Act programs released over the past year.

Our updated analysis finds that the programs we first evaluated in 2023 have only marginally improved implementation of principles and associated metrics. The benchmarks set by the Good Jobs Initiative, the Good Jobs Principles, and corresponding MOUs are still not being applied consistently across agencies and programs. Programs newly evaluated in the 2024 analysis show the same inconsistency as those evaluated in our first white paper, with some EPA programs being a notable exception. Programs such as the Greenhouse Gas Reduction Fund and Methane Emissions Reduction Program (MERP) effectively integrated high-road labor standards and environmental equity from the Good Jobs Principles into guidance and funding announcements. Without more consistent application of the Good Jobs Principles and associated metrics across the programs and agencies, the administration is not fully seizing the opportunity presented by BIL, CHIPS and the Inflation Reduction Act to advance equity and rebuild the middle class with good paying union jobs.

METHODOLOGY

The eight Good Jobs Principles established through the Good Jobs Initiative support the creation and maintenance of high-quality jobs and community benefits. These principles are:

1. Recruitment and Hiring;
2. Benefits;
3. Diversity, Equity, Inclusion, and Accessibility (DEIA);
4. Empowerment and Representation;
5. Job Security and Working Conditions;
6. Organizational Culture;
7. Pay; and
8. Skills and Career Advancement.

Using DOL's Good Jobs Toolkit, BGA identified a set of metrics for each of these eight principles and evaluated how these labor and equity standards are being applied in agency guidance, Funding Opportunity Announcements (FOA), and/or Notices of Funding Opportunities (NOFO) for a targeted set of BIL programs.

This analysis re-evaluates seven programs previously analyzed in our 2023 paper. These programs were funded by the BIL through the following four federal agencies: DOI, EPA, DOT, and the U.S. Department of Homeland Security (DHS) (See Appendix A). For these seven programs, we provide a detailed comparison with our 2023 analysis, focusing on identifying any shifts in adherence to the Good Jobs Principles and metrics. These programs were selected for re-evaluation because they have released updated guidance or funding announcements since the release of our 2023 paper.

The programs re-evaluated for job quality measurements were:

- **DOI:** Orphaned Wells (State Formula Grants); Abandoned Mine Lands (AML);
- **DHS:** U.S. Federal Emergency Management Agency (FEMA) Building Resilient Infrastructure and Communities (BRIC); Flood Mitigation Assistance (FMA);
- **DOT:** Rebuilding American Infrastructure with Sustainability and Equity (RAISE); Port Infrastructure Development Program (PIDP); and
- **EPA:** The Clean School Bus Rebate Program

We also selected nine additional programs for evaluation. These programs were funded by the CHIPS & Science Act, Inflation Reduction Act, and BIL. These new programs are evaluated using an updated set of metrics that reflect current administration priorities and standards for job quality and community benefits. These new metrics are explained in more detail below.

The additional programs selected for this updated analysis include:

- **DOC:** Commercial Fabrication Facilities; Small Scale Suppliers;
- **DOE:** Industrial Demonstrations Program; Domestic Manufacturing and Conversion Grant; Clean Energy Financing (Title 17);
- **DOE/EPA:** Methane Emissions Reduction Program (Mitigating Emissions from Marginal Conventional Wells (MCWs));
- **EPA:** Greenhouse Gas Reduction Fund (GGRF); Climate Pollution Reduction Implementation Grants (CPRG); and
- **USDA:** Empowering Rural America Program (New ERA).

It is our hope that this analysis will identify how to improve cohesion across federal agencies and between the Good Jobs Principles, existing MOUs, and program guidance, FOAs, and NOFOs for BIL and Inflation Reduction Act investments. This white paper is intended to be a resource to agencies working to build job quality and equity into program implementation. It is important to note that agencies have varying legal authorities and mandates. The purpose of this white paper is to assess and compare job quality across a standardized set of metrics, without delving into the nuances of each agency's specific legal frameworks.

ANALYSIS

The eight Good Jobs Principles provide a roadmap to support and create high quality jobs and community benefits. Because the principles are high level in nature, BGA has identified a more specific and measurable set of metrics under the umbrella of these eight principles. The eight principles as well as the identified metrics are defined below.

The Good Jobs Principles are overlapping and interconnected, therefore metrics for measuring good jobs could be relevant in multiple places. BGA identified metrics within each principle where they add the most value to the analysis. Additionally, the "Organizational Culture" principle was not included as a standalone principle or metric in the analysis below. BGA determined that this principle overlaps with other principles and is already measured in other metrics.

Recruitment and Hiring

The Principle as Defined by DOL: Qualified applicants are actively recruited—especially those from underserved communities. Applicants are free from discrimination, including unequal treatment or application of selection criteria that are unrelated to job performance. Applicants are evaluated with relevant skills-based requirements. Unnecessary educational, credential, and experience requirements are minimized.

Metrics: For this principle, BGA has identified the following metrics:

- **PLAs and Community Workforce Agreements (CWAs):** A PLA is an instrument used on construction projects to predict and control project timelines and labor costs. Sometimes referred to as a CWA because of the benefits and opportunities these agreements provide to local communities. PLAs establish the terms and conditions of employment of workers on specific construction projects, including wages, hours, working conditions, and dispute resolution methods.
- **Community Benefits Agreement (CBA):** CBAs are legally binding agreements used to ensure that community interests are taken into account in large development or construction projects. They can be negotiated with both union and community partners.
- **Community Benefits Plan (CBP):** The CBP (or similar structure) acts as a framework for a CBA and other agreements, laying the groundwork for comprehensive discussions on how projects can positively impact local communities and workers and garner local support for a project. As used by DOE, a CBP details the project's scope, potential for community enhancements, strategies for engagement with unions and communities, and sets the stage for formal negotiations leading to a CBA. Other agencies may use a similar structure under a different name.
- **Local Hire:** Local Hire benchmarks—often a key feature of CWAs—support the hiring of workers from within the state or local community.
- **Targeted Hire:** These benchmarks—also a key feature of CWAs—support employing workers from certain communities, which may include women, people of color, veterans, the formerly incarcerated, indigenous people, economically disadvantaged communities, communities heavily impacted by climate change, pollution, energy transition, or deindustrialization, and many others.

- **Collective Bargaining Agreement:** A collective bargaining agreement is a written legal contract between an employer and a union representing the employees. The collective bargaining agreement is the result of a negotiation process between the parties regarding topics such as wages, hours, and terms and conditions of employment.⁵

Why This Is Important: To maximize the benefits of federally funded programs and projects on workforce development, job quality, and economic opportunity, federal agencies should—depending on their statutory authority and type of project—require or strongly encourage a range of tools. For example, collective bargaining agreements are agreements negotiated between employers and labor unions that outline the terms and conditions of employment, including wages, benefits, and working conditions. PLAs ensure high-road labor standards and timely project completion by providing project owners with access to the safest, most productive, and best-trained construction workers available in any given market. Large construction projects can benefit from a PLA even if they're not subject to Executive Order 14063 that requires the use of PLAs for federally funded projects over \$35 million.⁶

In addition, CWAs and CBAs can include provisions such as local and targeted hire, pre-apprenticeship training programs, and other community benefits. These agreements help ensure that jobs are created where they are needed most, including low-income communities, communities of color, and deindustrialized communities. Local hire and targeted hire provisions are also important tools to help ensure that jobs go to the communities where projects are built. These provisions may mandate a certain percentage of local workers be used, offer incentives to hire local workers, or prioritize funding opportunities through contracting and hiring requirements. Without local hire provisions, job creation benefits for the local community could be minimized. Targeted hire provisions can help ensure that certain underrepresented populations are prioritized for hire on federally funded projects, which could include dislocated workers.

COMMUNITY BENEFITS PLANS

DOE's **CBPs** are a requirement of most DOE BIL and Inflation Reduction Act funded applications and are encouraged by other agencies' funding opportunities (though often under a different name). CBPs provide a comprehensive framework that applicants for grants and loans from all federal agencies can use to demonstrate commitment to creating good jobs and career pathways for a diverse pool of workers, as well as long-term economic, social, environmental, and health benefits for communities.

DOE requires four overlapping components in a CBP application:

- Engaging community and labor;
- Investing in the U.S. workforce;
- DEIA; and
- Implementing Justice40.

Why CBPs are useful: CBPs provide a comprehensive framework that applicants for grants and loans from all federal agencies can use to demonstrate commitment to creating good jobs and career pathways for a diverse pool of workers, as well as long-term economic, social, environmental, and health benefits for communities. Unions and communities can be key partners to companies as they bring projects to fruition by helping to recruit and train a skilled workforce, acquire necessary local permits, and get buy-in and support from local leaders. These kinds of relationships can also de-risk projects by shortening permitting and siting timelines, improving the prospect for future development, and ensuring quality products and projects that are competitive in a global marketplace. For a step-by-step guide to identifying and engaging communities and labor unions and identifying potential high-road workforce development partners, consult BGA's [User Guide for Companies to Demonstrate Community Benefits in Federal Funding Applications](#).⁷

Improving and Implementing CBPs: the inclusion of labor engagement and job quality metrics within the broader CBP framework may undercut agencies' ability to ensure that projects are creating good, union jobs. Because of the scoring mechanism in many funding opportunities, applicants may be able to ignore or fall short on key labor standards outlined in the CBP while satisfying a significant portion of the community standards, and therefore still score highly in the evaluation process. In future funding processes, DOE and other agencies utilizing this model should develop a better scoring mechanism that separately takes into account both labor and community standards and ensures that applicants meet a minimum threshold on both. While community benefits and labor standards are both important, they possess distinct characteristics and cannot be considered synonymous. As such, it is imperative to approach each aspect separately and with appropriate attention and consideration.

As implementation moves into the awards phase, agencies must ensure that awardees are committing to meeting—and to the greatest extent practicable, exceeding—their commitments to job quality and community benefits proposed in CBPs. Entities recommended for awards must show firm application of and commitment to the Good Jobs Principles. Further, job quality must be a high priority from the beginning of construction through the full life of a projects. We urge agencies to ensure that job quality extends to the full scope of projects, including permanent jobs in operations and maintenance. We encourage agencies to develop metrics, standards, and expertise to hold entities accountable and enforce commitments made in a CBP. Metrics should evaluate progress towards milestones, job quality, community benefits, and more. This information should also be publicly available.

Benefits

The Principle as Defined by DOL: Full-time and part-time workers are provided family-sustaining benefits that promote economic security and mobility. These include health insurance, a retirement plan, workers' compensation benefits, work-family benefits—such as paid leave and caregiving supports—and others that may arise from engagement with workers. Workers are empowered and encouraged to use these benefits.

Metrics: For this principle, BGA has identified the following metrics:

- **Retirement Contributions:** Retirement contribution is a payment made by an employer on behalf of an employee to a retirement savings plan or account, such as a 401(k) or pension plan.
- **Fringe Benefits:** Fringe benefits are additional compensation or benefits provided by an employer to an employee beyond their regular salary or wages, such as health insurance, paid time off, or bonuses.

Why This is Important: By promoting retirement and fringe benefits, federal agencies can help ensure that workers can thrive both in and outside of the workplace and contribute to a more stable and prosperous society. Employers are already legally required to provide a range of benefits, including Social Security, health insurance, unemployment insurance, medical leave, and workers' compensation. In addition to these legally required benefits, employers are free to offer additional benefits—or “fringe benefits”—to attract and retain employees. These can include retirement contribution, life insurance, transportation benefits, tuition assistance, childcare support, paid leave, caregiving support, educational assistance, sick days, or any other compensation provided to employees beyond salary and wages. High-road benefits like retirement contributions and fringe benefits can support employer recruitment efforts, motivate existing employees to increase and maintain high performance, and reduce employee burden with certain free and money-saving accommodations like transportation assistance or meal stipends. Employers stand to greatly benefit when their workforce is healthy and satisfied with their employment. When an employer has a satisfied workforce, they will likely face less turnover which saves the employer money.^{8,9}

Retirement contributions can be difficult to measure because they may be included or excluded depending on other requirements. For example, if a workforce is covered under a PLA or collective bargaining agreement, retirement provisions are more likely to be secured. Similarly, if they are included as a requirement of locally offered fringe benefits, they are also likely to be secured. However, if retirement is not included in fringe benefits and the project is not

covered by an agreement, then retirement provisions may be precarious. However, as a stand-alone metric, none of the identified program guidance and/or funding announcements offer recommendations or requirements for retirement contributions. This is a category where stronger language is needed to ensure workers have access to this compensation. Retirement contributions can help workers prepare for their future by building savings over time.

Diversity, Equity, Inclusion, and Accessibility (DEIA):

The Principle as Defined by DOL: All workers have equal opportunity. Workers are respected, empowered, and treated fairly. DEIA is a core value and practiced norm in the workplace. Individuals from underserved communities do not face systemic barriers in the workplace. Underserved communities are persons adversely affected by persistent poverty, discrimination, or inequality, including people of color; LGBTQ+ individuals; women; immigrants; veterans; individuals with disabilities; individuals in rural communities; individuals without a college degree; individuals with or recovering from substance use disorder; and justice-involved individuals.

Metrics: For this principle, BGA has identified the following metrics:

- **Adherence to Title VI of the Civil Rights Act:** Applicants that receive federal financial assistance in the form of grants, contracts, loans, or other forms of financial assistance are required to comply with Title VI and promote equal access and prevent discrimination based on race, color, or national origin in any program or activity.
- **DEIA Plans:** Applicants are required to develop and submit a DEIA plan that describes the actions the applicant will take to advance equity, including fostering a welcoming and inclusive environment; supporting people from underrepresented groups; and encouraging participation by and partnership with
 - » institutions serving disadvantaged communities;
 - » businesses and enterprises owned by people of color;
 - » woman owned businesses;
 - » veteran owned businesses;
 - » Tribal colleges and universities;
 - » community-based groups;
 - » faith-based organizations; or
 - » entities located in an underserved community that meet the eligibility requirements.

- **Project Assessment:** Applicants are required to develop and submit an assessment of project impacts that includes a description of impacted communities and groups; which of these are considered disadvantaged communities; a characterization of the existing burdens these communities face using the EPA's [EJSCREEN](#) tool, disadvantaged community definition tools, or other analytical tools; and an assessment of project benefits, negative impacts and where each flow.¹⁰

Why This is Important: By upholding the principles of Title VI of the Civil Rights Act, federal agencies can help promote a more inclusive and equitable society and ensure that all individuals can participate fully in the benefits of federal programs and activities. Title VI applies to both public and private entities that receive federal funds, such as schools, hospitals, housing authorities, transportation providers, and many others. Compliance can include implementing policies and procedures to prevent discrimination, providing training to employees and volunteers on Title VI compliance, and establishing complaint procedures to address allegations of discrimination. Similarly, DEIA planning and project assessment can help applicants ensure that projects are planned with equity embedded in the design and implementation. This includes ensuring that projects support underrepresented groups and businesses and that impacts on communities are taken into consideration in project design.

Empowerment and Representation

The Principle as Defined by DOL: Workers can form and join unions. Workers can engage in protected, concerted activity without fear of retaliation. Workers contribute to decisions about their work, how it is performed, and organizational direction.

Metrics: For this principle, BGA has identified the following metrics:

- **A Worker's Right to Organize and Collectively Bargain:** Agencies require that award recipients or any subrecipient affirm a worker's right to organize, which refers to the legal right of workers to form and join unions, engage in collective bargaining, and engage in other concerted activities for the purpose of representation and protection.
- **Prohibition on Spending:** Agencies require that award recipients or any subrecipient may not use grant funds, whether directly or indirectly, to support or oppose union organizing.

Why This is Important: The right to organize is an important tool for promoting workers' rights, improving wages and working conditions, and ensuring greater economic and social justice. Through the collective bargaining process, workers represented by a union negotiate the terms of their employment with their employer. This includes wages, benefits, hours, health and safety requirements, dispute resolution, advancement, and more. Research has shown that through the collective bargaining power of unions, workers are able to get consistent and better benefits across the covered workforce—such as [health insurance](#) and pensions—and are able to fight for greater enforcement of the labor protections they have a right to under the law, like safety and health regulations and overtime.^{11, 12} Additionally, collective bargaining is one of the most powerful tools for comprehensively and consistently raising standards for any industry, as each renegotiated collective bargaining agreement—which typically has a three to five year lifetime—usually includes gains for the workers.

Moreover, research has shown that across the board, union members earn higher wages than non-union workers and this difference is [most pronounced](#) for workers of color and women.¹³

- White male union members earn 12% more in wages on average compared to white male non-union workers;
- Female union members earn 17% more in wages on average compared to non-union female workers;
- Black union members earn 19% more in wages on average compared to non-union Black workers; and
- Latine union members earn 25% more in wages on average compared to non-union Latine workers.

Federal agencies can use their influence and resources to promote fair labor practices and ensure that workers are able to exercise their rights to organize and engage in collective bargaining. This can include encouraging applicants for federal funding to comply with these rights. Agencies should also require contractors to provide workers with information about their rights under applicable labor laws and regulations, particularly the National Labor Relations Act (NLRA). In principle, the NLRA guarantees workers the right to form and join unions, to bargain collectively with their employers, and to engage in other forms of concerted activity, such as strikes and protests, without fear of retaliation or discrimination by their employers.

Job Security and Working Conditions

The Principle as Defined by DOL: Workers have a safe, healthy, and accessible workplace, built on input from workers and their representatives. Workers have job security without arbitrary or discriminatory discipline or dismissal. They have adequate hours and predictable schedules. The use of electronic monitoring data is transparent, equitable, and carefully deployed with input from workers. Workers are free from harassment, discrimination, and retaliation at work. Workers are properly classified under applicable laws. Temporary or contractor labor solutions are minimized.

Metrics: For this principle, BGA has identified the following metrics:

- **Adherence to the Contract Work Hours and Safety Standards Act (CWHSSA):** The CWHSSA requires contractors and subcontractors on covered contracts to pay laborers and mechanics employed in the performance of the contracts one and one-half times their basic rate of pay for all hours worked over 40 hours in a work week.¹⁴
- **Evidence of a safety and health program:** This program is designed and implemented with workers and their representatives, adheres to all U.S. Occupational Safety and Health Administration (OSHA) regulations, and actively identifies and minimizes workplace hazards. Where OSHA coverage is not applicable, the project should comply with other relevant worker safety regulations.
- **Workforce Development Plan:** These plans call for employers to detail strategies for addressing long-term and short-term workforce needs of the project. It should identify skill gaps and provide targeted training and education opportunities. The plan demonstrates the employer's commitment to developing a skilled workforce that meets the project's requirements while promoting long-term community economic growth.
- **Misclassification:** The Fair Labor Standards Act (FLSA) provides minimum wage and overtime pay protections to nearly all workers in the United States. Some employers incorrectly treat workers who are employees under this federal law as independent contractors. We call this "[misclassification](#)."¹⁵

Why This is Important: Funding applicants should be requested or required to describe planned activities and policies that ensure worker engagement in the design and execution of workplace safety and health programs. These programs should include a comprehensive analysis and a management plan for all risks. They should also address how a strong safety culture will be built and maintained, how open communication about safety and lessons learned will be encouraged, how workers will be protected from harassment and discrimination, how retention rates will be measured, and how worker and workplace concerns will be addressed.

One way to help achieve this is by requiring applicants to express commitment to CWHSSA and OSHA at the time of the application, and during the use of program funds. Requiring compliance with CWHSSA ensures that workers are not exposed to unsanitary, hazardous, or dangerous working conditions on federal and federally financed construction projects. Frequently, workers in the construction industry are subject to overtime hours and the CWHSSA offers an avenue for intervention by the workers if the contractor violates the overtime requirements.

Requiring compliance with applicable OSHA and other safety standards ensures that the safety and health of workers are prioritized. Federal and state OSHAs are responsible for setting and enforcing standards related to workplace safety and health, and for providing education, training, and assistance to employers and workers to help them comply with these standards. OSHA's standards cover a wide range of hazards and risks that can arise in the workplace. Where OSHA coverage is not applicable, the project should comply with other relevant worker safety regulations.

Additionally, prevention of misclassification is critical to ensure workers are guaranteed benefits and protections. When workers are misclassified as an independent contractor, employers may try to deny them benefits and protections to which they are legally entitled. Federal agencies can require that applicants explain how projects will properly classify employees and notify all workers of their rights, including workers treated as independent contractors.

Pay

The Principle as Defined by DOL: All workers are paid a stable and predictable living wage before overtime, tips, and commissions. Workers' pay is fair, transparent, and equitable. Workers' wages increase with increased skills and experience.

Metrics: For this principle, BGA has identified the following metrics:

- **Adherence to the Davis-Bacon Act:** The Davis-Bacon Act and Related Acts require contractors and subcontractors on federal and federally assisted construction projects to pay their workers no less than the local prevailing wages and fringe benefits for the same type of work within the geographic area.
- **Living Wage:** Living wage is calculated based on the cost of living in a particular geographic area, considering the average cost of housing, food, healthcare, transportation, and other basic necessities.¹⁶

Why This is Important: Higher wages on a given project can attract high-road contractors employing skilled professionals who perform high quality work, helping projects meet construction milestones on time and safely, without increasing total construction costs. Higher wages can have long-term economic benefits to a community and create a long-standing professional workforce for future projects.

Compliance with the Davis-Bacon Act and Related Acts, adherence to prevailing wage requirements, and supporting living wages are essential for promoting fair compensation and high-quality work in the construction industry. Davis-Bacon rates are determined by DOL based on surveys of wages and benefits paid to workers in a local area. These rates typically include wages and fringe benefits such as health insurance, pension contributions, and other benefits that are customary for the type of work being performed. The goal of a living wage is to ensure that workers can afford these basic expenses without having to sacrifice other important aspects of their lives, such as healthcare, education, or saving for retirement. A living wage is considerably higher than the minimum wage set by law, and it is intended to provide workers with a minimum level of economic security and stability. Living wage policies have been implemented by labor unions, community groups, and governments as a way to address poverty and income inequality.

Skills and Career Advancement

The Principle as Defined by DOL: Workers have equitable opportunities and tools to progress to future good jobs within their organizations or outside them. Workers have transparent promotion or advancement opportunities. Workers have access to quality employer- or labor-management-provided training and education.

Metrics: For this principle, BGA has identified the following metrics:

- **Union-Affiliated Training Programs:** Industrial unions work with their employers on a variety of structures for labor-management training programs (some are registered apprenticeship programs) that provide a combination of classroom and on-the-job skills training. These programs provide workers with job training and career development opportunities to help them gain new skills and advance their careers.
- **Registered Apprenticeship:** A registered apprenticeship program is a training program that combines on-the-job training and classroom instruction. Apprenticeships are sponsored by employers, industry groups, or labor-management training committees. Registered apprenticeship programs are overseen by the DOL or a DOL-recognized State Apprenticeship Agency.
- **Pre-Apprenticeship:** A pre-apprenticeship program is a training program designed to prepare individuals for entry into an apprenticeship program.
- **Wrap-around Services:** these services focus on providing comprehensive support services for participants in workforce training programs. Essential services include high-quality childcare, transportation assistance, career counseling, health services, and language translation services.

Program Scoring

Why This is Important: These kinds of training programs offer wrap-around services to support trainees through the programs and help ensure that workers have a clear path towards skills advancement and career development. Federal agencies should encourage or—where statutory authority permits—require the use of these programs to promote workforce development and ensure that workers receive appropriate training and education. Requiring the use of these programs can also help to promote equity and fairness in the workplace by providing opportunities for individuals from underrepresented groups to access training and career advancement. In particular, pre-apprenticeships provide individuals with the basic skills and knowledge needed to succeed in a particular trade or occupation. These programs may include classroom instruction, hands-on training, and mentorship opportunities, and they can help individuals build relationships with potential employers and apprenticeship sponsors. Pre-apprenticeships are often targeted towards individuals who may face barriers to entry into apprenticeships and/or certain populations such as low-income workers, workers of color, women, and other disadvantaged communities. Additionally, the use of these programs can help to promote a more skilled and capable workforce, supporting the economic development and prosperity of communities across the country. It is critical, however, that quality pre-apprenticeship programs are used.

DOL published model funding opportunity language that includes guidance on how to define a quality pre-apprenticeship and lays out five standards. A [quality pre-apprenticeship](#):

1. is designed in collaboration with registered apprenticeship program sponsors;
2. provides meaningful hands-on training that does not displace paid employees;
3. facilitates entry and/or articulates into a registered apprenticeship program;
4. creates sustainable partnerships that promote the use of registered apprenticeships as a preferred means for industry to develop a skilled workforce and to create career opportunities and pathways leading to registered apprenticeship enrollment; and
5. provides access to appropriate supportive services (e.g., wrap-around services such as child-care and transportation).¹⁷

Just as agencies are not uniformly applying the Good Jobs Principles in implementation, they are also not uniformly scoring applications. If agencies score job quality and community benefits, these criteria are often only a small percentage of available points. At most, job quality and community benefits are 20% of an application score (as in DOE's Industrial Demonstrations Program). In many cases, job quality and community benefits criteria are not scored.

Why This is Important: Scoring in a federal funding application is vital for evaluating proposals and directing funds towards projects with significant potential impact and alignment with program objectives. Scoring criteria provide clarity to agencies, applicants, reviewers, and stakeholders, fostering transparency and accountability throughout the award process. By assessing proposals against clear criteria, agencies can determine not only the potential impact of projects but also whether applicants have adequately considered job quality and community benefits. Scoring and weighting job quality and community criteria alongside technical and economic criteria reflects a commitment to fostering projects that not only meet infrastructural needs but also enhance worker and community well-being.

Table 1 and 2 Color Key

Require	If a program document explicitly requires a metric, it is placed in this category
Recommend	If a program document includes language that supports, encourages, and/or recommends a metric, but does not require them, they are placed in this category
No Mention	If a program document does not include any mention of a metric, it is placed in this category

Table 1: Comparison of 2022 and 2023 Metrics and Programs

Program	Federal Agency	Department of the Interior				Department of Homeland Security				EPA		DOT			
		Orphaned Wells (2022)	Orphaned Wells (2023)	Abandoned Mine Lands (2022)	Abandoned Mine Lands (2023)	BRIC (2022)	BRIC (2023)	Flood Mitigation Assistance (2022)	Flood Mitigation Assistance (2023)	Clean School Bus (2022)	Clean School Bus (2023)	PIDP (FY23)	PIDP (FY24)	RAISE (FY23)	RAISE (FY24)
Good Jobs Principle	Metric														
Recruitment and Hiring	Project Labor Agreement / Community Workforce Agreement		Orange	Green	Green	Orange	Orange					Orange	Orange	Orange	Orange
	Community Benefits Agreement		Orange	Green	Green										Orange
	Local Hire Agreement	Orange	Orange	Green	Green	Orange	Orange							Orange	Orange
	Targeted Hire Agreement														
	Collective Bargaining		Orange	Green	Green								Orange		
Benefits	Retirement Contribution														
	Fringe Benefits	Green	Green	Green	Green							Green	Green	Green	Green
DEIA	Title VI of Civil Rights Act					Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green
	DEIA Plan											Green	Green		Green
	Project Assessment										Orange				
Empowerment and Representation	A Worker's Right To Organize					Green	Green	Green			Orange	Orange	Orange	Orange	Orange
	Prohibition on Spending			Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Job Security and Working Conditions	Contract Work Hours and Safety Standards Act Compliance											Orange	Orange		
	Occupational Safety and Health Administration		Orange	Orange	Green							Orange	Orange		Orange
	Misclassification/FLSA						Orange					Green	Green		
Pay	Davis-Bacon	Green	Green	Green	Green		Orange					Green	Green	Green	Green
	Living Wage														
Skills and Career Advancement	Pre-Apprenticeship		Orange	Orange	Orange										
	Registered Apprenticeship	Orange	Orange	Orange	Orange	Orange	Orange	Orange				Orange	Orange	Orange	Orange
	Other Union Training programs		Orange		Orange		Orange				Orange		Orange		

Figure 1:

Changes in Required and Recommended Metrics between 2023 and 2024

The figure below measures the share of opportunities an agency has taken to either require or recommend metrics supportive of the seven assessed Good Jobs Principles (presented as percentages). Higher percentages indicate a higher number of metrics required or recommended in agency guidance and funding opportunities. Note that there is little change between our 2023 and 2024 analysis, and no agency or program reaches 100%.

See Appendix B for a description of methodology.

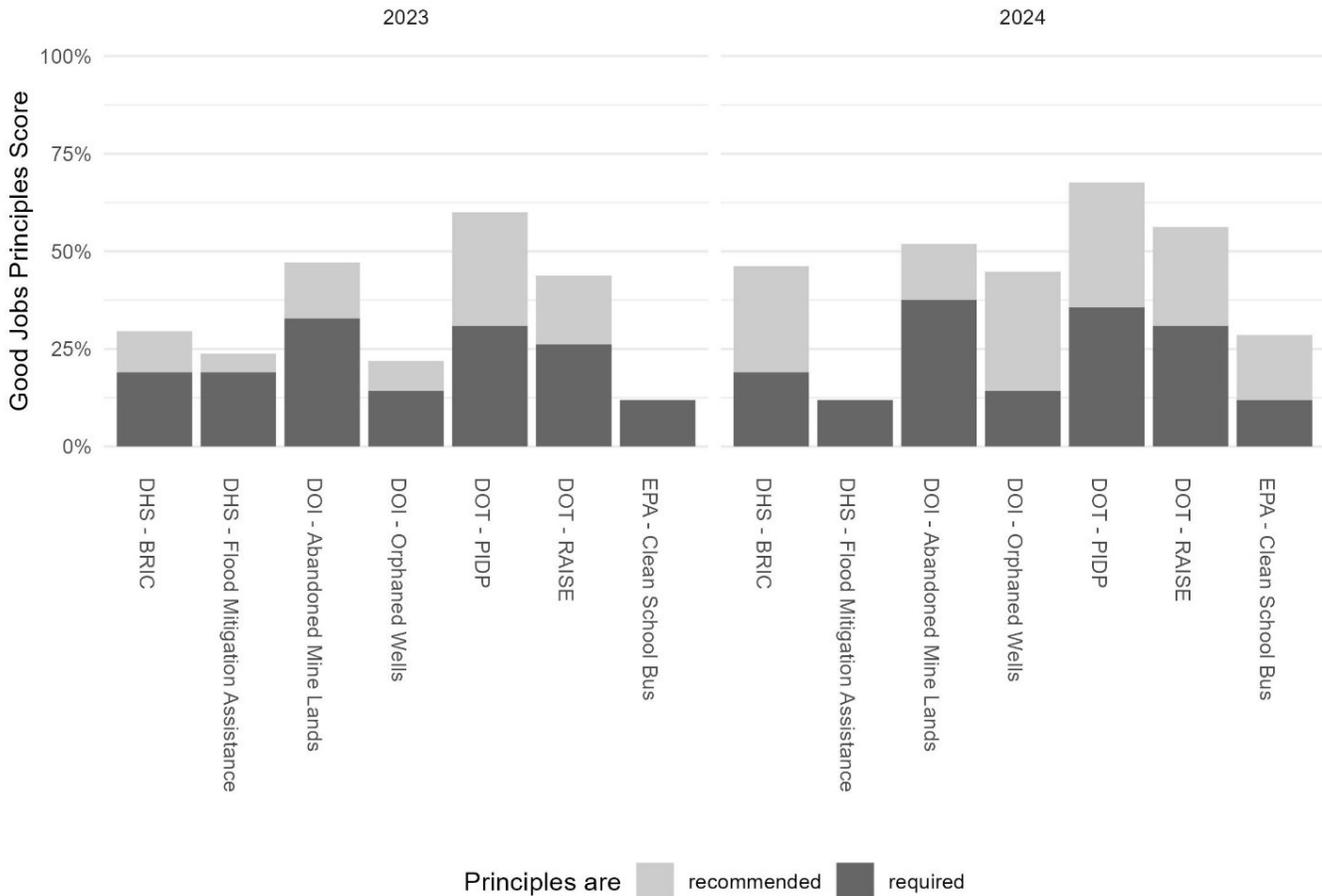


Table 2: 2024 Metrics and Programs

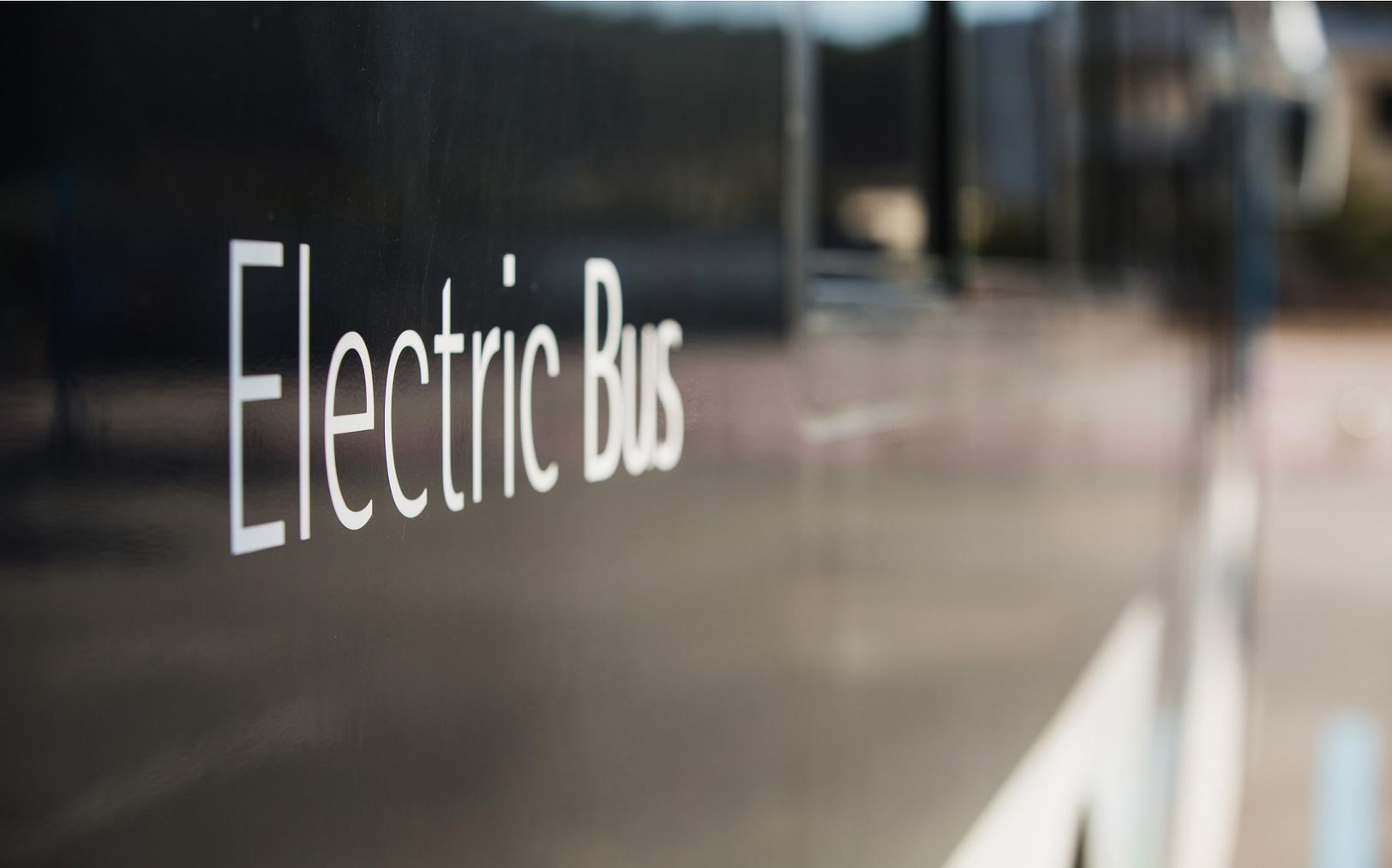
Program	Federal Agency	DOC		DOE			DOE/EPA	EPA		USDA
		Commercial Fabrications	Small Scale Suppliers	Industrial Demonstrations Program	Domestic Manufacturing	Title 17	Methane Emissions Reduction Program	Greenhouse Gas Reduction Fund (NCIF)	Climate Pollution Reduction Implementation Grants	Empowering Rural America (New ERA)
Good Jobs Principle	Metric									
Recruitment and Hiring	Project Labor Agreement / Community Workforce Agreement									
	Community Benefits Agreement									
	Community Benefits Plan (or similar structure)									
	Local Hire Agreement									
	Targeted Hire Agreement									
	Collective Bargaining									
	Benefits	Retirement Contribution								
	Fringe Benefits									
DEIA	Title VI of Civil Rights Act									
	DEIA Plan									
Empowerment and Representation	A Worker's Right to Organize									
	Prohibition on Spending									
Job Security and Working Conditions	Contract Work Hours and Safety Standards Act Compliance									
	Occupational Safety and Health Administration									
	Workforce Development Plan									
	Misclassification/FLSA									
Pay	Davis-Bacon									
	Living Wage									
Skills and Career Advancement	Pre-Apprenticeship									
	Registered Apprenticeship									
	Other Union Training programs									
	Wrap-around Services									
	If scored, what percentage of the score is community and labor?	Qualitative	0	20	12.5	Not specified	N/A Formula Grant	10.8	16	0

CONCLUSION

The BIL, CHIPS & Science Act, and Inflation Reduction Act represent landmark policy victories, setting the stage for a major economic transformation that addresses climate change and improves public health, creates good union jobs across the country, and results in a more fair and equitable economy for everyone. Implementation of these laws is critically important to ensure the promise of these transformative pieces of legislation is realized and that benefits for workers, communities, and the environment are maximized.

Unfortunately, this 2024 analysis shows only slight improvements in the implementation of the programs we first evaluated in 2023 (Figure 1). All of the programs from our 2023 white paper still have significant room for improvement, though some programs (such as BRIC, Orphaned Wells, and Clean School Bus) did show marked improvement on Recommend metrics. It's also noteworthy that we identified one program—the DHS Flood Mitigation Assistance Program—that did even worse in this updated analysis.

In all agencies and programs evaluated in our white papers, consistency remains a challenge. EPA programs newly evaluated in this updated paper are a notable outlier. These programs (MERP, CPRG, and GGRF NCIF) required or recommended a significant majority of the metrics laid out in this paper (Table 1). Two new programs evaluated for this updated white paper (Title 17 and New ERA) showed little evidence of adhering to the Good Jobs Principles. As implementation continues, federal agencies must strengthen implementation of BIL, CHIPS and the Inflation Reduction Act in order to achieve the Biden administration's goals of ensuring workers and communities see the benefits of these investments while creating good union jobs.



Electric Bus

APPENDIX A

Administering Agency and/or Office	Eligible Entities	Program Name and Description	Program Type
DOI - Orphaned Wells Program Office	States and Tribes.	Orphaned Wells - This program aims to reduce the environmental and safety risks posed by orphaned oil and gas wells on public and tribal lands. Orphaned wells are wells that have been abandoned by their owners without proper closure and restoration, which can lead to leaks of oil, gas, and other pollutants that can contaminate the surrounding land and water resources. The program provides funding for the plugging, reclamation, and remediation of orphaned wells, as well as for the restoration of affected ecosystems and habitats.	Guidance
DOI - Office of Surface Mining Reclamation and Enforcement	Certified/Uncertified States and Tribes.	Abandoned Mine Lands (AML) - The program provides grants to states and tribes to reclaim and restore abandoned mine lands, including stabilizing land and waterways, mitigating acid mine drainage, and restoring ecosystems. The program also supports research and development of innovative techniques for mine reclamation and cleanup.	Guidance
DHS - Federal Emergency Management Agency	States, Local Communities, Tribes, and Territories.	Building Resilient Infrastructure and Communities (BRIC) - The program provides grants to state, local, and Tribal governments, as well as certain private nonprofit organizations to fund projects that address risks related to flooding, earthquakes, wildfires, and other hazards. Eligible project categories include physical infrastructure, social infrastructure, and mitigation planning	Notice of Funding Opportunity
DHS - Federal Emergency Management Agency	States, Local Communities, Tribes, and Territories.	Flood Mitigation Assistance (FMA) - The program provides grants to state, local, and Tribal governments, as well as certain private nonprofit organizations to fund projects such as floodplain and shoreline management, property acquisition and demolition, structural and non structural flood mitigation measures.	Notice of Funding Opportunity

DOT - Office of the Secretary	States, Tribes or consortium of Tribes, territories, local government; a public agency or public chartered authority established by one or more states; a special purpose district or public authority with a transportation function, including a port authority; a transit agency, a multi-state or multijurisdictional group of entities that are separately eligible.	Rebuilding American Infrastructure with Sustainability and Equity (RAISE) - The program aims to provide funding to support the construction, renovation, and repair of transportation infrastructure that improves safety, mobility, and accessibility, while also promoting environmental sustainability and equity. Specifically, the program provides grants to eligible state, local and Tribal governments, as well as other entities for the development of transportation projects that enhance the nation's infrastructure, support economic growth, and improve quality of life for communities.	Notice of Funding Opportunity
DOT - Maritime Administration	A port authority, a commission or its subdivision or agent under existing authority, states, Tribes local government, a public agency or publicly chartered authority established by one or more states, a special purpose district with a transportation function, a multistate or multijurisdictional group of entities, or a lead entity described above jointly with a private entity or group of private entities (including the owners or operators of a facility, or collection of facilities, at a port).	Port Infrastructure Development Program (PIPD) - The program aims to provide funding to support the development, improvement, and modernization of ports and port-related infrastructure. Specifically, the program provides grants to eligible public and private entities for the planning construction, renovation and repair of port infrastructure projects that enhance port efficiency, safety, and security, while also promoting economic growth and environmental sustainability. The program prioritizes projects that improve the safety and efficiency of freight movement, enhance port resiliency and preparedness, and promote economic opportunity in underserved communities.	Notice of Funding Opportunity
DOE/EPA	Available to eligible states for the purpose of mitigating methane emissions from Marginal Conventional Wells by providing financial assistance to operators/well owners to voluntarily and permanently plug and abandon MCWs.	MERP - Mitigating Emissions from Marginal Conventional Wells (MCWs)	Funding Opportunity Announcement
EPA	Lead organizations for CPRG planning grants, executive branch-level agencies, offices, and departments in states, D.C., Puerto Rico, municipalities, tribes, tribal consortia, territories, and groups of such entities.	Climate Pollution Reduction Implementation Grant (CPRG) - This program aims to develop and implement plans for reducing greenhouse gas emissions and other harmful air pollution.	Notice of Funding Opportunity

EPA	National nonprofit clean financing institutions capable of partnering with the private sector.	Greenhouse Gas Reduction Fund (National Clean Investment Fund) - The fund will be implemented via three grant competitions including the National Clean Investment Fund, Clean Communities Investment Accelerator, and Solar for All. The fund is designed to achieve three objectives; to reduce greenhouse gas emissions and other air pollutants, deliver the benefits of greenhouse gas—and air pollution—reducing projects to U.S. communities, particularly low-income and disadvantaged communities; and mobilize financing and private capital to stimulate additional deployment of greenhouse gas and air pollution reducing projects.	<u>Notice of Funding Opportunity</u>
EPA - Office of Transportation and Air Quality	Schools districts, non-profit transportation associations, tribes, contractors.	Clean School Bus Grant Program - The program aims to reduce diesel emissions from school buses by providing rebates to eligible school bus owners who replace older, polluting buses with new, cleaner vehicles. The program will provide rebates of up to \$20,000 per bus for the purchase of new, eligible school buses, or up to \$6,000 per bus for the retrofit of older buses with emissions control technologies.	<u>Notice of Funding Opportunity</u>
DOC - National Institute of Standards and Technology	Nonprofit, private sector entity, a consortium of private-sector entities, a consortium of nonprofit, public, and private-sector entities with a demonstrated ability to substantially finance, construct, expand, or modernize a facility relating to development of semiconductors, materials used to manufacture semiconductors or semiconductors manufacturing equipment.	Commercial Fabrication Facilities - This program seeks to support investments in the construction, expansion, and modernization of (a) commercial facilities in the United States for the front—and back—end fabrication of leading-edge, current generation, and mature-node semiconductors; (b) commercial facilities in the United States for wafer manufacturing; and (c) commercial facilities and for materials used to manufacture semiconductors and semiconductor manufacturing equipment, providing that capital investment equals or exceeds \$300 million.	<u>Notice of Funding Opportunity</u>

DOC - National Institute of Standards and Technology	Nonprofit, private sector entity, a consortium of private-sector entities, a consortium of nonprofit, public, and private-sector entities with a demonstrated ability to substantially finance, construct, expand, or modernize a facility relating to development of semiconductors, materials used to manufacture semiconductors or semiconductors manufacturing equipment.	Small Scale Suppliers - This program seeks to support the construction, expansion, and modernization of commercial facilities for semiconductor materials and manufacturing equipment for which capital investment falls below \$300 million.	Notice of Funding Opportunity
DOE - OCED	Higher education institutions, non-profit entities, for-profit entities, Tribes, states, local governments, incorporated consortia, unincorporated consortia.	Industrial Demonstrations Program - The IDP will accelerate decarbonization projects in energy intensive industries and provide American manufacturers a competitive advantage in the race to lead the world in low and net-zero carbon manufacturing	Funding Opportunity Announcement
DOE - Office of Manufacturing and Energy Supply Chains	Recipients should be manufacturing for eligible vehicle types, businesses, small businesses, and/or individuals.	Domestic Manufacturing and Conversion Grant - This grant aims to provide cost sharing to support domestic production of efficient hybrid, plug-in electric hybrid, plug-in electric drive, and hydrogen fuel cell electric vehicles.	Funding Opportunity Announcement
DOE - Loan Programs Office	Developers, clean tech manufacturers and service providers, regulated utilities, public power entities, independent power producers, and others.	Clean Energy Financing (Title 17)	Guidance
USDA	Electric cooperatives.	Empowering Rural America Program (New Era) - The program helps rural Americans transition to clean, affordable, and reliable energy. By reducing air and water, New ERA funding improves health outcomes and lower energy costs for people in rural communities. New ERA program funding available to member-owned rural electric cooperatives, which have been the backbone of America's rural power delivery for nearly a century.	Funding Announcement

APPENDIX B

Figure 1 captures the share of opportunities an agency has taken to either require or recommend metrics supportive of the seven assessed principles (presented as percentages). They are constructed as weighted averages, where each of the seven principles are given equal weight in the score, but each principle is itself composed of an average computed over between two and six metrics. So, for example, if an agency recommends Davis-Bacon but not Living Wage in a particular program at a given measurement period, that agency-program will score one out of two, or 50%, on the Pay principle. The Recruitment and Hiring principle, by contrast, has either five or six sub-metrics. When considering the agency's full "recommend" score for a program, though, the 50% Pay score will only count as one seventh of the total calculation, as would the Recruitment and Hiring Principle score.

ENDNOTES

- 1 The White House, Executive Order on the Use of Project Labor Agreements for Federal Construction Projects, February 4, 2022. <https://www.whitehouse.gov/briefing-room/presidentialactions/2022/02/04/executive-order-on-use-of-project-labor-agreements-for-federal-construction-projects/>
- 2 The White House, The White House Task Force on Worker Organizing and Empowerment: Update on Implementation of Approved Actions, March 17, 2023. <https://www.whitehouse.gov/briefing-room/statements-releases/2023/03/17/the-white-house-task-force-on-worker-organizing-and-empowermentupdate-on-implementation-of-approved-actions/>
- 3 U.S. Department of Labor (DOL), The Good Jobs Initiative. <https://www.dol.gov/sites/dolgov/files/goodjobs/GoodJobs-Summit-Principles-Factsheet.pdf>
- 4 U.S. Department of Commerce and U.S. Department of Labor, Good Jobs Principles. <https://www.dol.gov/general/good-jobs>
- 5 Thomson Reuters Practical Law, Glossary: Collective Bargaining Agreement. [https://content.next.westlaw.com/practical-law/document/lbb09e90eef0511e28578f7ccc38dbee/Collective-BargainingAgreement?contextData=\(sc.Default\)&transitionType=Default&viewType=FullText&firstPage=true](https://content.next.westlaw.com/practical-law/document/lbb09e90eef0511e28578f7ccc38dbee/Collective-BargainingAgreement?contextData=(sc.Default)&transitionType=Default&viewType=FullText&firstPage=true)
- 6 EO 14063 applies to U.S. federal construction projects with a total estimated cost of \$35 million or more procured by the U.S. Army Corp of Engineers, General Services Administration, Naval Facilities Engineering Systems Command, and other federal agencies that directly procure federal construction contracts. “Agencies shall require every contractor or subcontractor engaged in construction on the project to agree, for that project, to negotiate or become a party to a project labor agreement with one or more appropriate labor organizations”(Section 3). This order does not apply to federally assisted construction contracts procured by state, local, and private stakeholders although other Biden administration policies promote the use of PLAs on certain federally assisted construction projects.
- 7 Center for American Progress, There Are Significant Business Costs to Replacing Employees, November 16, 2012. <https://www.americanprogress.org/article/there-are-significant-business-costs-toreplacing-employees/>
- 8 BGA, User Guide for Companies to Demonstrate Community Benefits in Federal Funding Applications. <https://www.bluegreenalliance.org/wp-content/uploads/2023/12/Companies-Succeed-Communities-Benefit-User-Guide-vFINAL.pdf>
- 9 A report by the Center for American Progress found that replacing an employee can cost a business anywhere from 16% to 213% of the employees salary, depending on the industry and position. By contrast, investing in employee satisfaction and retention can lead to significant cost savings for employers.
- 10 U.S. Environmental Protection Agency (EPA), EJScreen: Environmental Justice Screening and Mapping Tool. <https://www.epa.gov/ejscreen>
- 11 The Economic Policy Institute has conducted extensive research on unions’ impact on worker benefits. According to their research, unionized workers are more likely to have employer-provided health insurance, pensions, and other benefits than non-union workers. For example, they found that 94% of unionized workers have access to employer-provided health insurance, compared to 67% of non-union workers. They also found that unionized workers are more likely to have paid vacation and sick days, as well as better job security.
- 12 Economic Policy Institute, Union workers are more likely to have paid sick days and health insurance, March 12, 2020. <https://www.epi.org/blog/union-workers-are-more-likely-to-have-paid-sickdays-and-health-insurance-covid-19-sheds-light-on-inequalities-among-the-poorest-and-least-empoweredworkers/>
- 13 U.S DOL, Union Members 2023 News Release. <https://www.bls.gov/news.release/pdf/union2.pdf>
- 14 CWHSSA applies to federal service contracts and federally assisted construction contracts worth over \$100,000.
- 15 U.S. DOL, Get the Facts on Misclassification. <https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/misclassification-facts.pdf>
- 16 The Davis-Bacon Act (DBA) of 1931, 40 U.S.C. § 3141 et seq., applies to “every contract in excess of \$2,000, to which the Federal Government . . . is a party, for construction, alteration, or repair, including painting and decorating of public buildings and public works of the Government.” Id. § 3142. Since the DBA’s enactment, Congress has passed over 100 laws, known as Davis-Bacon Related Acts—extending prevailing wage requirements to projects that receive various forms of federal assistance, including federal grants, loans, loan guarantees, insurance, bonds, tax credits, and other innovative financing methods.
- 17 U.S. DOL, Job Quality and Equity Notice of Funding Opportunity (NOFO) Draft Language for Federal Agencies, 2023. <https://www.dol.gov/general/good-jobs/job-quality-and-equity-nofolanguage>