

Iowa Energy Efficiency Conservation Block Grant Program - Frequently Asked Questions

OVERVIEW

Is there a goal for the number of applications awarded?

There is not a set goal for the number of applications that will be awarded. It is expected that the Innovation and Community Fund will together fund between 6-12 applications.

Will this program be recurring? If so, what is the funding round frequency?

No. This program is only expected to be available once and will not open again for additional applications given the limited funding availability.

What is deadline for project completion?

June 30, 2026.

Will projects be funded based solely on meeting a minimum scoring threshold or will only the top scored projects be funded? If scored based on a minimum scoring threshold, could that result in the funding proportion decreasing per application?

Projects will be funded at their budget requested based on highest scoring applications, provided the applicant excludes all ineligible costs and unclear line items. Once the top scoring projects are funded, no additional projects will be funded.

For the Innovation Fund, can the cash match be other federal funds, such as from the Treasury, that have already been received?

Yes, unless the sources of federal funds exclude their use as match. The Iowa EECSBG program encourages applicants to consider opportunities to leverage or coordinate EECSBG funds with existing rebates, financial incentives and financing programs that may be available, as federally recommended.

In Blueprint 2C, there is a push to coordinate any proposed EECSBG energy efficiency program/campaign with forthcoming Inflation Reduction Act (IRA) rebate programs. When will the state begin running the IRA programs? With Iowa's IRA program proposal, will you be covering all of the potential rebates listed in Blueprint 2C, or only certain measures?

The Iowa Economic Development Authority will administer both the Home Efficiency Rebate (HER) and Home Electrification and Appliance Rebate (HEAR) programs made available through the federal Inflation Reduction Act. Most states, including Iowa, are still in the planning stages of program design. In order to meet federal requirements related to disadvantaged communities, data management, education and outreach, consumer protection, installer certification and other necessary elements, the planning process is extensive. At this time, we anticipate a program launch in the fourth quarter of 2024.

NEW – If an applicant is not in a disadvantaged community and does not have an energy plan will it be possible to score the minimum required points to be eligible for a funding award?

The minimum required score to be considered for funding has been reduced from 100 out of 125 (80%) to 75 out of 125 (60%).

APPLICANT ELIGIBILITY

The county is eligible for a direct federal allocation of EECBG funds, but the city is not. Does that mean the city cannot apply to the Iowa Community Fund?

The city is eligible to apply despite the county's federal direct allocation eligibility. Only the actual city and county governments listed below are NOT eligible to apply for the Iowa EECBG Community Fund. All cities, counties, nonprofits, and for profits are eligible to apply to the Iowa EECBG [Innovation Fund](#).

SPECIFIC LOCAL GOVERNMENT ENTITIES NOT ELIGIBLE FOR THE IOWA EECBG COMMUNITY FUND DUE TO THOSE ENTITIES RECEIVING A DIRECT FEDERAL ALLOCATION OF EEECBG FUNDS.

- Cerro Gordo County \$76,530
- Clinton County \$76,610
- Dallas County \$77,020
- Dubuque County \$76,330
- Johnson County \$77,580
- Linn County \$76,710
- Marshall County \$76,390
- Muscatine County \$76,520
- Polk County \$79,550
- Warren County \$76,660
- City of Ames \$128,040
- City of Ankeny \$124,300
- City of Bettendorf \$76,290
- City of Cedar Falls \$76,450
- City of Cedar Rapids \$185,610
- City of Council Bluffs \$122,870
- City of Davenport \$155,580
- City of Des Moines \$245,640
- City of Dubuque \$123,070
- City of Iowa City \$136,380
- City of Marion \$76,340
- City of Sioux City \$140,390
- City of Urbandale \$76,590
- City of Waterloo \$129,180
- City of West Des Moines \$131,740

Are school districts able to participate in this program?

School districts can partner with local governments for the Community Fund if the local government is eligible. The local government is required to submit the application for the Community Fund. School districts can directly participate in the Innovation Fund.

Can an entity apply for more than one project?

Yes, each project will be independently scored. It is highly unlikely that one entity would receive multiple awards due to limited funding available.

Would an EMS agency that is run under a city municipality apply for the Community Fund or would it be better to have the city that we serve under apply?

The city should be the applicant. The federal requirement from Department of Energy is that at least 60% of the state of Iowa's award must be subgranted to cities and counties that were not eligible for a direct federal allocation. In the Community Fund, the Iowa Economic Development Authority must limit applicants to only cities and counties.

Could a municipal utility apply for Community Funds if the county government is listed as non-eligible?

The city would need to be the applicant and so long as the city is eligible, the municipal utility can partner to apply. For example, the eligible city of Muscatine (within the ineligible Muscatine County) would like to do a project with Muscatine Municipal Utilities, that is eligible for the Community Fund.

What will the EECBG program define as a low-to-moderate (LMI) community?

For the EECBG program, IEDA defines a low-to-moderate income (LMI) community as a community where at least 51% of the community's population is of low-to-moderate income per HUD's dataset from the American Community Survey. Alternatively, a local income survey following the process utilized by the Iowa Community Development Block Grant program can also be used to determine whether 51% or more of a community's residents meet the low-to-moderate income definition. Applicants can use income surveys conducted in the current calendar year or either of the two prior years to document LMI benefit.

Are we only able to use the DOE and HUD indicators for disadvantaged communities? If so we won't be able to earn any points under that scoring criteria which is worth up to 20 points. Because a minimum of 100 points out of 125 possible are required to have a qualifying app, the resolution of this question is critical to whether we apply.

IEDA seeks to support the federal Justice40 goal by investing at least 40 percent of program funding in disadvantaged communities. The Department of Energy only recognizes as disadvantaged communities those census tracts identified by the [Climate and Economic Justice Screening Tool](#) (CEJST). Only projects located in disadvantaged communities identified in the CEJST Tool will receive the full 20 points in the application review process. Projects in non-disadvantaged communities but located in HUD identified [low-to-moderate income \(LMI\) communities will receive](#) fewer points for the disadvantaged community scoring criteria. Projects not located in a disadvantaged community or LMI community will receive 0 points for the disadvantaged community scoring criteria. IEDA has adjusted the overall minimum application score to be considered for an award to 75, instead of 100. This adjustment will make it easier for applications for projects not taking place in a disadvantaged or LMI community to meet or exceed the minimum score to be considered for a funding award.

NEW - Does a community have to be identified by HUD as a low-to-moderate income (LMI) community to be eligible to apply?

No. The EECBG program does not have a city-wide LMI requirement. There is a federal goal to invest 40% or more of the funds in disadvantaged communities, but local governments regardless of LMI status are eligible to apply.

PROJECT ELIGIBILITY

Would the grant pay for solar panels at a wastewater treatment lagoon?

For the Community Fund portion of the EECBG program, solar panels would NOT be eligible. For the Community Fund portion, an example project would be to improve the performance of the existing pumps through equipment modification or to replace the pumps with more efficient pumps to reduce energy use. Within the Innovation Fund of the EECBG program, renewable energy projects will be considered but must be innovative and replicable.

Are renewable energy projects (such as solar installations) only eligible via Innovation Fund?

Yes.

Can EECBG funds be used to install electric car charging stations, or are those considered new-installations, and therefore non-eligible?

Innovation Fund dollars could be used to install EV charging stations given all other selection criteria are addressed. Community Fund dollars are not able to be utilized on EV charging stations.

Can the Innovation Fund be used to address a transportation or fleet related efficiency improvement project, using alternative fuel sources or electrification?

Yes, the project would likely align with the program goal of “improving energy efficiency in transportation sector, building sector, and other appropriate sectors.”

For the Community Fund, would city park lighting qualify? Updates to make current lighting energy efficient, but then installing additional lighting? Lighting would be light poles in the park and lighting within park pavilions.

Generally, yes city park lighting would qualify. However, federal regulations dictate that new poles cannot be installed where lighting was not already present. It is eligible to improve the energy performance of the existing lighting along streets, in city parks, and at public buildings, for example.

Regarding the Community Fund, a city is currently working to refurbish and rebuild a park pavilion. The pavilion is connected in inoperable electricity. Would bringing back electrical restoration then be considered new installation or would it be considered an upgrade? Also, would the pavilion adding additional outlets be considered eligible?

A grant application seeking funding to replace or install new electricity hook ups is not likely to be very competitive. The EECBG program is designed to reduce energy use, to reduce fossil fuel emissions, and to improve energy efficiency. Installation of new electricity hook ups doesn't support the objectives of the EECBG program. Updating existing lighting is an eligible cost.

Does IEDA have expectations for who completes the energy audits and puts together the project scope for projects such as energy efficiency improvements at wastewater and water treatment facilities, replacing streetlight lamps with LEDs, or building energy efficiency upgrades?

No, IEDA does not have specific expectations on who completes energy audits and puts together the project scope for EECBG applications. Applicants should utilize qualified auditors and project designers. When developing the project scope of work and budget, please consider any potential budgetary impacts that federal regulations such as Build America, Buy America, and Davis-Bacon Act prevailing wages may have and budget accordingly.

The EECBG application states that projects may be ineligible if work has already begun. The city has been working on replacing bulbs in the street lights with energy efficient bulbs. Would this still qualify since they have been working on it already? They have been working on it for a couple of years now and so far have been able to replace the bulbs in the downtown district and those along the main highway, but have not done any in the residential areas.

The project would still be eligible. IEDA included language in the application about projects that are already started to avoid situations where meeting any federal requirements such as federal procurement, environmental review, Build America/Buy America, and Davis-Bacon Act would be difficult or not possible to meet. Federal compliance can still be achieved for a project like the one you are describing as none of the work has begun yet on the streetlight lamps being considered for upgrades.

NEW - Would replacement of existing generators that use fossil fuels with generators using renewable fuels be eligible/competitive for either fund within EECBG?

The emphasis in the EECBG Community Fund is on projects that improve energy efficiency and lower energy costs. While improvements in energy efficiency also often result in less fossil fuel emissions, a project focused on fossil fuel replacement and a reduction in fossil fuels emissions may fit best in the EECBG Innovation Fund. In the application, it will be important to focus on the benefits the project will provide to the community including resilience benefits.

NEW - Would the installation of a smart water meter be eligible/competitive for either fund within EECBG?

A smart water meter project would be eligible for consideration under the EECBG Community Fund or EECBG Innovation Fund. In the project description portion of the application, be sure to elaborate on the project's potential energy savings benefits.

NEW - Can EECBG funds be used to construct a new building?

Federal rules state that EECBG Program funds may not be used toward new buildings or construction. A structure is considered a building when there is both permanent walls and roofing. Further, activities considered within the NEPA bounded activities are limited to improvements restricted to an existing footprint of ground disturbance.

COMPLIANCE

We are interested in applying to the Community Fund to convert existing streetlights to LED and have chosen a specific product to standardize. The local vendor noted that the product is not Buy American Act (BAA) compliant. Is BAA-compliance mandatory for EECBG participation? If BAA-compliance is mandatory, do you know if a BAA waiver is in place for LED security lights? We are not aware of a BAA-compliant LED security light. [Build America, Buy America](#) (BABA) (not the same as Buy American) applies to EECBG. IEDA is not aware of a Build America, Buy America general waiver in place for LED security lights. An individual project can request a BABA waiver if at least one of the following three conditions apply.

1. Nonavailability
2. Unreasonable cost
3. Public interest

There has been a waiver request approved for a school LED lighting project. See [BABA 2023-04 Berlin BABA Waiver Request POC.pdf \(energy.gov\)](#) for the approved waiver. The waiver is project specific, so does not apply

to other projects. Similar projects for the same products can submit a similar waiver request.

If the project is selected for an EECBG award, a BABA waiver request could be submitted at that time. Remember that federal procurement processes outlined in 2 CFR 200.317 – 200.327 and 2 CFR Part 910 also apply to the EECBG program.

Does the Davis-Bacon Act exemption for work done on seven or fewer single-family homes apply to these funds?

No, the Davis-Bacon Act exemption found in federal Housing and Urban Development related acts for work done on seven or fewer single-family homes only applies to federal Housing and Urban Development funded housing projects. The Davis-Bacon Act **DOES** apply to residential energy efficiency and renewable energy projects funded by the EECBG program. You can find more information on Davis-Bacon in Part V, Section D of the [EECBG Program Administrative and Legal Requirements Document](#), and in the DOE [Desk Guide to the Davis-Bacon Act](#).

As far as energy audits for buildings, my understanding of those is common findings may be HVAC systems, windows, blowing insulation, etc. Would all of those types of improvements be eligible, assuming that it was part of the energy audit finding? Also, once we get into those types of building improvements, would IEDA require any type of plans prepared by an architect to clear the 106?

Typical building energy efficiency upgrades such as insulation, air sealing, lighting, HVAC systems, pumps and motors are eligible. Windows may also be an eligible expense. Windows; however, often have a long financial payback and if replacing windows, a Historic Preservation Act Section 106 review may be needed to determine if the replacement windows reflect the period, style, or regional characteristics of the building. IEDA's historic preservation programmatic agreement with the Department of Energy and the State Historic Preservation Office exempts many building energy efficiency upgrades from Section 106 review as long as the upgrades are implemented in compliance with the [programmatic agreement](#). A full list of the exempt activities can be found in appendices A and B of the [programmatic agreement](#). Activities that may require Section 106 review should be designed by a professional familiar with the Section 106 review process and the Secretary of the Interior's Standards for the Treatment of Historic Properties.

NEW - Does the Davis-Bacon Act apply to EECBG projects involving construction of more than \$2,000 utilizing a contractor at public buildings? How about residential projects involving construction of more than \$2,000 utilizing a contractor?

The Davis Bacon Act does apply for projects involving construction of more than \$2,000 in a public building (state or local government entity owned). The Bipartisan Infrastructure Law (BIL) states that any construction project which uses federal funds is subject to DBA broadening the original "public works and infrastructure" applicability. Therefore, projects involve weatherizing low-income homes (as in this case), the contractors are subject to DBA.

NEW - Are private individuals able to contract directly with their preferred contractor on their private property without having to follow federal procurement requirements specified in 2 CFR 200 so long as it qualifies under the simplified acquisition threshold criteria outlined in 2 CFR 220.320(a)?

Yes. Once awarded, grant recipients and subrecipients are allowed to follow their own internal procurement procedures. Individuals can contract directly with a contractor of their choosing.