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Advancing Procedural Equity in Environmental Benefit Programs: Insights from California's Electric Vehicle Purchase Programs

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Advancing Procedural Equity in Environmental Benefit Programs: Insights from California's Electric Vehicle Purchase Programs

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16. Abstract

The California Air Resources Board (CARB) offers several benefit programs that support residents with the transition to electric vehicles. The Clean Vehicle Assistance Program (CVAP) provided grants and financing to help low-income households purchase or lease electric vehicles from 2018–2024. The Access Clean California (ACC) program streamlines access to clean transportation incentives through a network of community outreach partners. This study examines procedural equity in these two programs through interviews with CARB staff, program administrators, community partners, and program participants. We conclude CVAP fell short in several ways, including insufficient community engagement and a lack of targeted outreach, funding instability resulting in frequent program closures, and challenges in successfully distributing low-interest loans, while the ACC program has not fully simplified incentive access. We recommend improved transparency in program reporting, regular third-party equity evaluations, strategic development of a truly equitable financing program, and refined funding allocation and administration to enhance equity outcomes.

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List of Abbreviations

ACC	Access Clean California
BSF	Beneficial State Foundation
CARB	California Air Resources Board
CBO	Community-based organization
CC4A	Clean Cars 4 All
CVAP	Clean Vehicle Assistance Program
CVRP	Clean Vehicle Rebate Project
DAC	Disadvantaged community
DCAP	Driving Clean Assistance Program

Executive Summary

Executive Summary

California has set stringent targets for transitioning its light-duty automotive fleet to clean vehicles to combat climate change. By 2035, all passenger vehicles sold in the state must be zero-emission. To ensure this transition is achieved equitably, strategic and targeted efforts must be made to support lower-income households with considerable financial and social barriers to purchasing clean vehicles. Additionally, given the new federal administration's position on climate and energy investments, California is poised not only to maintain but to expand its leadership in promoting clean vehicles.

The California Air Resources Board (CARB) offers several benefit programs that support California residents with the transition to electric vehicles. Equity is a particularly important consideration for these programs, since purchasing and operating vehicles is expensive. The state's move to direct funds toward low- and moderate-income households reflects the importance of an equity focus. However, program design and implementation outcomes are not synonymous, and it is by no means automatic that large per-household benefits from a pool of limited funding reach the most in-need populations. Thus, it is important to study the processes that guide the distribution of these limited financial resources.

There has been a historical focus on the distributive component of environmental justice,[1–3] which attempts to measure fairness in the allocation of environmental benefits or risks to various sub-populations. Procedural equity – encompassing the equitable involvement of communities impacted by an environmental process or event – is equally important to assess within any policy implementation context.

Here, we analyzed the attainment of procedural equity in two novel programs, selected for their program goals and priorities beyond those of more long-standing, simpler vehicle purchase credit or rebate approaches (which have also been more closely studied).[4–7] The two programs are the *Clean Vehicle Assistance Program* (CVAP) and *Access Clean California* (ACC). We analyzed procedural equity through a previously developed framework including three primary aspects: participation and inclusiveness, community and individual economic resilience, and respect and recognition of diverse perspectives.

CVAP was an innovative program designed to provide grants and financing assistance to low-income households to purchase or lease a clean vehicle. The program utilized a loan loss reserve (with a safety net of funds reserved to protect against potential losses, providing risk coverage) and offered a specific preferred lender with an interest rate cap, but participants were not required to receive a loan through that lender to receive a vehicle purchase grant. CVAP operated from 2018–2024, when its funding was terminated. ACC grew out of CARB's "One-Stop-Shop" pilot program beginning in 2018 and uses a network of community outreach partners throughout the state to provide residents in low-income and disadvantaged communities (DACs) with information on their eligibility for the state's clean transportation incentive programs and support them in easily and efficiently completing multiple program applications. ACC was developed to increase awareness of the state's available programs and streamline participation by, among other things, bundling multiple programs for low-income communities and DACs through a centralized system, and extending community-based outreach efforts, including providing education and technical assistance.

We analyzed the implementation of these two programs to inform future similar efforts, by interviewing CARB staff, personnel at implementing organizations, community partners and advisors, and program participants who received benefits. We supplemented the interviews by reviewing secondary documents and program data.

The interviews provided useful insights into the equity efforts and outcomes of each program. CVAP implementers had strong equity intentions but fell short of achieving procedural and distributive equity goals. Multiple program closures throughout the lifetime of CVAP (associated with funding limitations) had negative downstream effects on community, dealership, and participant engagement. The program struggled in part due to a lack of investment in community partnerships and targeted outreach. Additionally, CVAP was originally envisioned as a financing program, but only three percent of participants received low-interest financing from CVAP's preferred lender, with other participants seeking financing elsewhere. CARB's newly launched Driving Clean Assistance Program (DCAP) should apply lessons from CVAP to avoid revisiting program shortcomings.

ACC was conceived with an explicit goal of developing a one-stop-shop for the state's clean transportation benefit programs (e.g., vehicle purchase and mobility incentives, including programs such as CVAP), with a focus on increasing community awareness of available programs and providing technical assistance for enrollment as well as targeted community-based outreach and education.[8] It has evolved to primarily focus on building and sustaining a community outreach partner network and conducting case management. While there is distinct equitable participatory value in the community-engaged outreach network, with millions of dollars expended and the concept of a true one-stop-shop web platform yet to be achieved after seven years, the program's net benefits — and success in distributing incentives more conveniently — are unclear.

1. **Increase funding stability and transparency**
   Report transparently on partnerships, outreach, program applications, and incentive distribution. Provide clarity when programs must close.
2. **Conduct third-party program evaluations**
   Regularly contract external evaluators to evaluate quantitative and qualitative benchmarks of procedural and distributive equity outcomes.
3. **Improve needs-based financing opportunities**
   Develop a low-interest clean vehicle financing program for in-need populations, applying lessons from successful loan loss reserve programs.
4. **Evaluate and optimize resource allocation**
   Examine how ACC fits into CARB's broader clean transportation outreach strategy and whether program resources are allocated effectively.

Figure ES 1. Key recommendations

We recommend several steps to enhance equity in program implementation (**Figure ES-1**). We suggest that program partners increase transparency in reporting program outcomes, particularly for incentive distribution through ACC. We also encourage regular third-party evaluations for multiple dimensions of equity, including both procedures and distribution. Funding uncertainty and delays, including inconsistent distribution of available funds to flow through the programs from the state budget to contracted administrators, was a challenge for both programs. This has adverse downstream effects and needs to be addressed by state agencies. Our analysis of CVAP also highlights the need for the development of a more equitable financing program, which will require public dialogue and transparency, along with taking lessons learned from other efforts successfully utilizing loan loss reserve programs. Additionally, we recommend that the state assess where they are expending program resources for ACC and whether to consider reallocating funds to improve actual incentive distribution, considering there are no required distributive outcomes (with respect to benefit receipt) for the program.

Increasing equity in the state's clean transportation incentive policies and programs has, and will continue to, require innovative program designs that meaningfully incorporate insights from program partners and advocates. CARB and program administrators should be poised to advance both procedural and distributive equity in their suite of programs but must critically reexamine funding priorities, program design strategies, and transparent reporting procedures.

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Issue and Overview of Programs

California has set stringent targets for transitioning its light-duty automotive fleet to clean vehicles to combat climate change. By 2035, all passenger vehicles sold in the state must be zero-emission. To ensure this transition is achieved equitably, strategic and targeted efforts must be made to support lower-income households with considerable financial and social barriers to purchasing clean vehicles. Additionally, given the new federal administration's position on climate and energy investments, California is poised not only to maintain but to expand its leadership in promoting clean vehicles.

The California Air Resources Board (CARB) offers several benefit programs that support California residents with the transition to electric vehicles and promote a just transition to a low-carbon future. Such programs are increasingly necessary, as they reduce upfront costs for households to purchase clean vehicles and install household technologies (e.g., charging infrastructure) that support a clean energy transition but are generally not affordable for low-income populations. Equity is a particularly important consideration for these programs, since purchasing and operating vehicles is expensive. The state's move to direct funds toward low- and moderate-income households reflects the importance of an equity focus. However, program design and implementation outcomes are not synonymous, and it is by no means automatic that large per-household benefits – supporting purchase of a clean vehicle – from a pool of limited funding reach the most in-need populations.

There has been a historical focus on the distributive component of environmental justice,[1–3] which attempts to measure fairness in the allocation of environmental benefits or risks to various sub-populations. Procedural equity – encompassing the equitable involvement of communities impacted by an environmental process or event – is equally important to assess within any policy implementation context. While there is substantial literature on the distributive outcomes of several clean vehicle benefit programs,[5–7,9] research is scarce on the procedural equity of these programs supporting clean technology adoption in lower income populations, as well as approaches to improve outcomes.[10] It is important to study the processes that determine application and distribution of these limited financial resources.

Here, we analyze CARB's Clean Vehicle Assistance Program (CVAP) and Access Clean California (ACC) programs because they feature different program designs and priorities and therefore highlight a variety of challenges and opportunities that exist in these types of programs. Specifically, they are distinct from two long-standing and more closely studied CARB programs, the Clean Vehicle Rebate Project (CVRP), which offered rebates for clean vehicle purchases or leases from 2010-2023, and Clean Cars 4 All (CC4A), which provides a purchase incentive for replacing an older, internal combustion engine vehicle with a clean vehicle, with a focus on low-income households and state-identified disadvantaged communities (DACs).

CVAP was a pilot program that offered both clean vehicle point-of-sale buy-down grants – a cash incentive to support purchase – and financing opportunities for low- and moderate-income households. There are inherent limitations to the ability of the public sector to offer grants, whereas successful loan assistance programs (especially self-financing ones) can extend to a much broader set of beneficiaries.[11] CVAP was administered by Beneficial State Foundation (BSF), a financial justice nonprofit organization, which offered affordable financing with an eight percent maximum interest rate, though participants had the right to choose their own lender with interest rate limits.[1] CVAP operated from 2018 through 2024 with multiple phases including two primary phases followed by a "soft launch" with a program redesign aimed to increase loan uptake, before CARB moved on to contract with a different program administrator for a future iteration of the program, which is no longer called CVAP.[2] [12]

ACC also began in 2018, then titled the One-Stop-Shop Pilot Project. It is administered by GRID Alternatives, a mid-sized, California-based non-profit organization with several hundred employees. ACC was developed to increase awareness of the state's available programs and streamline participation by, among other things, bundling multiple programs for low-income communities and DACs through a centralized system, and extending community-based outreach efforts, including providing education and technical assistance.[13] These types of campaigns are vital in supporting a just transition to a clean energy future, as the number of state and federal climate-related benefit programs has proliferated in recent years.[14]

From 2018 through May 2024, $25.4 million in CVAP funds were distributed to participants through nearly 5,050 buy-down grants.[3] [9,15,16] Despite the program's novel loan element aiming to provide fair financing through low-interest loans to low- and moderate-income households, only approximately 160 low-interest loans from the program's preferred lender, Beneficial State Bank,[4] were disbursed.[5] [16] As of fiscal year 2023-2024, $22 million had been allocated to the ACC program since its inception in 2018, which includes development of the web platform ($6 million), the outreach network and support ($10.5 million), technical assistance and capacity building ($2.0 million), and miscellaneous costs ($3.5 million).[8]

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[1] Beneficial State Foundation staff confirmed there was an 8% rate requirement for the preferred lender throughout the lifetime of the program. In response to predatory lending practices, a 16% rate maximum for lenders outside of the program was established in October 2018, which was lowered to a 12% cap in December 2019.

[2] Beneficial State Foundation confirmed that the program was open through May 2024, with the "soft launch" starting in June 2023.

[3] The total amount of funding allocated to the CVAP program over its lifetime was not readily publicly available.

[4] Beneficial State Foundation is the founding investor and majority shareholder of Beneficial State Bank (see https://www.beneficialstatebank.com/about-us/beneficial-state-foundation)

[5] Our original dataset was provided by CARB through a Public Records Act request in early 2024 and only included records through October 2023; prior to publication, Beneficial State Foundation program staff supplemented our dataset with records from November 2023 – May 2024.

Data and Methods

We conducted semi-structured interviews from August 2024 through January 2025 with program funders, administrators, community partners and advisors, and participants (n=11 for each program, n=22 total).[6] To develop our interview questions, we reviewed publicly available materials for each program, including websites, CARB reporting documents, and public presentations. We asked questions across several program implementation themes, including program structure and roles of stakeholders; program outreach methods; community and other partnerships; case management and direct assistance to participants; and program strengths, challenges, and lessons learned.

For CVAP, we interviewed:

- staff from the implementing/funding agency, CARB
- three previous or current staff from the program administrator, BSF
- two of the program's community advisors
- five program participants.

For ACC, we interviewed:

- staff from the implementing/funding agency, CARB
- staff from the program administrator, GRID Alternatives
- a previous equity advisor
- four community partners in ACC's outreach partner network
- four program participants.

The program participants we interviewed were hand-selected and connected to us through the program administrators. These individuals all successfully participated in one of the programs and received benefits. While this has the potential to introduce bias, there was no other way to contact program participants. Similarly, as we did not have the capacity to contact all the nearly 30 partners in the ACC partner network, several of these connections were made through the program administrator. We recognize that each community partner's experience as a part of ACC may have informed their decision of whether to be interviewed for this project.

We could not verify the accuracy of each statement made during the interviews. Stakeholders expressed varying perspectives on events that occurred, challenges in program design and adaptation, and the driving factors impacting program outcomes. While we did our best to report the most accurate information in cases

[6] The interview process was certified exempt by UCLA's Institutional Review Board (IRB #24-000637).

where interviewees had differences of opinion, we note that some individuals went so far as to openly question the unbiased nature of other interviewees.

We recorded and transcribed each interview, and synthesized the responses to the interview questions under a revised procedural equity framework previously developed by our research team.[4]

The framework includes three primary aspects, shown in **Figure 1** below.

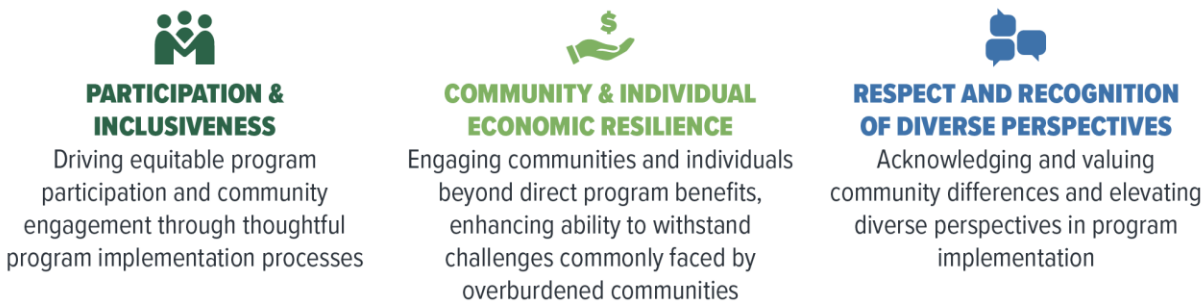

Figure 1. Procedural equity framework

A fourth aspect, *decision-making influence*, centers around the involvement of affected community members or stakeholders in program decision-making processes. While this is a core procedural equity consideration, it is less applicable for statewide programs of this nature, which are largely administered using a top-down approach.[4] Therefore, we do not include these considerations here, though we note that increasing public participation in program design and implementation presents an opportunity for improving procedural equity. Additionally, several considerations in *respect and recognition of diverse perspectives*, such as response to community feedback, may in turn support decision-making influence.

Results

First, we analyze CVAP program implementation (Section 3.1) along the three dimensions of procedural equity outlined in Section 2, followed by an analysis of ACC (Section 3.2). For each program, we first provide several key contextual points made in the interviews, then analyze program outcomes in terms of each procedural equity aspect. Key results are depicted in **Figure 2**.

	Clean Vehicle Assistance Program (CVAP) 2018–2024	**Access Clean California (ACC)** 2018–Present
PARTNERSHIPS	Lacked strong community partnerships and a strategic targeted outreach approach	Built a novel, statewide outreach network of nearly 30 community partners
CHALLENGES	Despite genuine equity intentions, program partners struggled to reach in-need populations	Partners struggled to implement one-stop-shop vision, primarily due to coordination challenges with program administrators
OUTCOMES	Economic benefits not maximized; loan loss reserve underutilized, with few loans distributed, limiting lasting benefits; late-stage program changes were successful — but too late.	There are no data available on how many individuals have received one or multiple incentives through ACC efforts
FUNDING	Inconsistent funding undermines program implementation:	
	Suffered from repeated program closures stemming from oversubscription and budgeting mismanagement, severely hindering implementation and impact	Posed challenges to CBOs conducting outreach for often-closed programs in the ACC network, and participants were confused when listed benefits were unavailable

Figure 2. Overview of key results

Clean Vehicle Assistance Program (CVAP)

Interviews consistently emphasized that as a pilot program offering low-interest loans to low- and moderate-income households, CVAP's financing aspect was novel, and accordingly, was a learning experience. Ultimately, the program faced multiple challenges in program development and operation, with one interviewee stating, "*there were quite a few elements of the program that were curious to me in terms of program sustainability.*" Challenges included repeated and unpredictable CVAP program closures due to lack of funding and agency discretion, a limited number of participants applying for loans for the first several years of the program, as well as limited resources allocated to targeted outreach throughout the lifetime of the program. BSF, the program administrator, made a considerable effort to increase loan acceptance rates to improve participation in the final phase of the program, which was successful. These efforts included increasing the loan loss reserve percentage to finance additional risk (creating a financial buffer), which improved participation in the last year of the program. BSF also developed educational materials highlighting the issue of dealer steering (dealers guiding participants to a specific vehicle or feature for their own benefit) and introducing Beneficial State Bank as a non-predatory lender with terms that could save consumers thousands of dollars over the course of an auto loan.

Multiple interviews from individuals from different organizations highlighted that program implementers had strong equity intentions, with one person from BSF stating:

> *I think there is like a real, genuine care about reaching folks that were going to benefit the most from this. So, folks from target demographics and communities. A challenge for that was implementation.*

Understanding lessons learned from CVAP implementation is particularly salient as CARB has recently begun implementing its new statewide Driving Clean Assistance Program, or DCAP, which includes a new vehicle "fair financing" component with a maximum interest rate through several partnering credit unions. Notably, one interviewee involved with DCAP implementation highlighted:

> *I think that's one of the things that [the DCAP program administrator] understands is that market transformation isn't the name of the game here. It's really [focused on] how do we reach the hard-to-reach folks?*

CARB staff additionally highlighted that the DCAP program administrator is "*[finding] a wide range of outreach and education teams at the community-based organization (CBO) level to work with.... [T]hat was the lesson learned [from CVAP]*" driven by the consideration that *"[community members] work directly with CBOs and they trust them.*"

However, the closure of CVAP has raised ongoing implementation issues that are not being adequately addressed. A BSF staff member shared frustration with the lack of preparation in the program closure process, stating, "*everything from loan loss reserve, who's going to operate it and how is there enough money in there for the loans that are currently on the books? Where does that funding come from?*"

We note again here that our CVAP interviewees expressed differing perspectives on program implementation motives, methods and outcomes. With this in mind, we now turn to an in-depth analysis of CVAP program implementation.

Participation and Inclusiveness

Outreach approach. The way a program conducts outreach — including the communities it targets and the methods it uses — directly shapes who is reached and influences the degree of equity achieved in program participation. Several interviewees suggested that despite the program's intent, CVAP fell short in terms of program outreach to targeted DACs, particularly in the first few years of the program. A significant procedural equity consideration is the priorities reflected within program budgets. CVAP was a statewide program with a paid media budget but a one-person outreach department, which proved challenging in implementing the program.

CARB staff reflected on the lessons learned in outreach through the various stages of the program, recalling first how early outreach through Beneficial State Bank's existing channels resulted in a "*flooded initial response*," and stated that though they developed a "*thorough outreach and education plan*" to improve outreach in the next stage, they were never able to fully implement it due to the COVID-19 pandemic. Finally, demand for clean vehicles created through the release of new Tesla models resulted in them "*not using any kind of outreach and education resources because demand was already created [by vehicle availability].*"

More efforts were made to engage with targeted communities in the later years of the program. One BSF staff member stated, "*we started partnering and reaching out to small organizations who are highly active in their communities,*" and BSF's previous community engagement manager (originally hired as a community outreach coordinator) stated that about 2-3 years after the initial launch of the program, more of an effort was made to work with organizations serving communities of color, rural communities, and Native American communities. One interviewee noted that ACC also opened up the network of partners for CVAP to connect with. Yet much of this outreach was still assessed as "*very, very limited*" due to capacity and funding. None of the participants we interviewed heard about the program through community outreach; they all either found the program through searching online for incentives or heard about it through word of mouth. One stated:

> *I never saw any [advertisements or outreach] in any clinics or any places that people go when they're low income, and they need help .... It was so baffling to me that a lot of people didn't know about it, and by the time I would tell them about it, they weren't able to get [benefits] because [the program had] closed.*

BSF's community engagement manager — while not directly involved in application review or decision-making — also described limitations in using social media outreach to reach target populations:

> *We were getting more folks that were not part of the target demographic for our social media outreach efforts. [We were getting folks that] were like business owners and would claim a ton of losses on their taxes and they would qualify for the program.*

One participant stated, "*I am grateful for the grant, and I just wish that it was more advertised to people who actually really need it.*" Unfortunately, the program administrator did not have the authority or data to restrict applications or turn down individuals with significant wealth but sufficiently low income to be eligible for the program. The income-wealth difference in screening applicants has been cited by researchers with respect to CARB's other incentive programs and broader benefit programs as well.[4]

Program outcome data reflect the reality of these struggles with outreach, demonstrating that CVAP did not reach the most disadvantaged populations. Only about 25 percent of CVAP funds were distributed to DACs throughout the life of the CVAP program;[9,15] nearly 48 percent of vehicles purchased were a Tesla model, and 71 percent of vehicles purchased were new cars, rather than cheaper used ones.[16] A community advisor explained that the high prevalence of Tesla cars "*wasn't because of the outreach that our partners were doing. It was because of Tesla doing their own outreach through their network.*" Of our five participant interviews, three individuals purchased Tesla vehicles. Additionally, several interviewees stated they would have purchased their vehicle even if they did not receive program benefits, indicating they had the financial means to do so. Notably, BSF made requests to CARB to exclude Tesla from CVAP, based on perceptions of abuse of the intent and/or rules of CVAP, but Tesla was not removed.

Program closures. CVAP faced frequent and unpredictable program closures that interviewees deemed an adverse side effect of the total lifecycle of state funding mechanisms from the governor or legislature to ultimate recipients. This includes chokepoints within state agencies, as well as within contracted program administrators. The effect of delays, closures and related lack of program clarity reported to us especially at the agency level thus appear to have weakened the overall consistency of the program for potential participants. This had ripple effects on participation, community engagement, and dealership relationships, and as stated by CARB staff, was "*very disruptive, and at points destructive*."

These closures were particularly challenging because target participants — low-income individuals living in DACs, including tribal communities — often needed a vehicle immediately and therefore had to purchase vehicles outside of the program. As CARB staff stated:

> *[specifically] for low-income consumers ... they are not in the market with the desire of, 'Oh, now I'm going to buy a new car or change my car.' They go into the market when they need to, and their cars are broken ... so they need immediate access.*

The impact of closures on community partnerships and downstream outreach was also described by BSF's community engagement manager: "*We weren't reaching the right populations and the intermittent program closures played a big part in that because we never really got to develop meaningful relationships with communities and CBOs.*" Another BSF staff member stated that

> *after funding would deplete, there'd be a lapse of time in between, and a lot of the goals were going to change or shifted from the state level. And so, it didn't allow for us to have long-lasting working experience with some CBOs.*

A community advisor expressed similar concern about impacts on participants, stating that "*this stop and go creates a challenge because the outreach that was happening, especially to low-income folks, wasn't then aligning with the accessibility of funds.*" Transparency and communication around the predictability of and thus the ability to plan around closures was another challenge. One BSF interviewee stated that these closures were also not "*well described to all stakeholders.*"

The program also faced substantial challenges with respect to dealer relationships, as expressed by both program staff and participants.[7] These issues may be partially attributable to program closures and associated confusion. Program staff expressed challenges in keeping dealerships engaged through the closure periods, and multiple program participants we interviewed indicated that after contacting dealers on the dealership list

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[7] Active U.S. Department of Transportation-funded research in this area aims to explore several equity-centric dealership topics in California. https://ncst.ucdavis.edu/project/assessing-transportation-equity-california-zev-incentives-participating-dealerships

provided by BSF, the dealer representatives indicated they had never heard of the program and did not know how to handle the grant approvals to complete the purchase. While BSF confirmed there were contracted relationships with all dealers on the list, there was no assurance that all dealership staff knew about the existence of the program.

Notably, CARB staff indicated that the framework for the new DCAP program was designed to mitigate "*on and off*" streams of funding through a more needs-based approach in which, as funding is depleted to certain levels, the program restricts eligibility to the most in-need through a tiered system. However, demonstrated success of this new approach has yet to be determined, and should be evaluated. BSF staff also noted that they designed a needs-based approach for CVAP, though it was never fully implemented, and ultimately, CARB selected a different program administrator to manage a future iteration of a financing program. BSF's needs-based approach was developed using historical data, partner feedback, and lessons learned. Among other aspects, it involved ensuring that participants that needed time to repair their credit and obtain a loan would still have funds available when they were ready to move through the program. The suggested approach also recommended only accepting applications referred by mission-aligned community partners.

Community partnerships. Partnering with local community organizations demonstrates a dedicated effort to increase equitable participation. By the time the program had reached its second phase in 2020, program implementers recognized the limitations in the outreach approach and that the resulting individuals participating in the program were not the intended recipients. Thus, CVAP partnered with two community organizations, Metropolitan Area Advisory Committee on Anti-Poverty of San Diego County, Inc. and Central California Asthma Collaborative. While the partnerships were successful, their effect was modest. These groups still had a "*small footprint*" when it came to the overall number of program participants, many of whom found the program through other channels.

Interviewees praised the performance of one of the new CBOs involved but also noted limitations, stating:

> *They have a really good network, and they're able to tell those communities like, here's this thing that can help you. They also give [BSF] feedback on what their applicants were telling them because they also accepted applications on our behalf and they would process them for us and send them up for us to do this type of work. So generally, these groups had a relatively small yield, but the idea [is] that they were better at dealing with hardship cases, providing very detailed handholding and support throughout the entire process.*

However, as described in the discussion about program closures, partnerships were ultimately challenging to maintain with such uncertainty in funding provision at the agency level, which influenced the future of the program.

Community and Individual Economic Resilience

Financial wellness opportunities through grants and low-interest loans. The need for fair lending practices — which can be facilitated through programs such as CVAP — is well-established, particularly considering that communities of color in California experience higher levels of automobile debt and associated debt burden as a percentage of household income.[17]

All participants expressed gratitude for the opportunity to participate in the program and receive a grant, and in some cases low-interest financing. Three of the participants we spoke with received loans through Beneficial State Bank. Several were also able to stack incentives with the recently closed CVRP program to increase benefits through a post-purchase rebate, which also means they purchased a new vehicle, as that was required for CVRP participation. Multiple participants noted that having the vehicle improved access to employment opportunities. One stated, "*[The program] helped me a lot .... A week after I purchased my car I got promoted, so without it ... probably I would have [had] to turn down the promotion because [every day] getting a ride from Uber is a lot of money.*" Another expressed gratitude for the program, stating:

> *It has helped my life improve drastically, ... now I am able to just get to work without Ubering or waiting for someone to take me, I just go on my own. The grant itself definitely helped, and I'm pretty sure that without the grant I wouldn't have gotten the financing.*

However, while CVAP primarily aimed to provide low-interest financing, and secondarily vehicle purchase grants, interviewees emphasized this as a missed opportunity, with CVAP never able to fully embrace the concept of loan loss reserve. BSF staff stated:

> *We had partnered with [the program's preferred lender] Beneficial State Bank, and we were utilizing them to provide a loan product. But early on, we didn't see a lot of success because no one has ever done this before. We've never had a loan loss reserve, and we'd never had a loan product to support this. So, there are still a lot of learnings there to be taken place.*

The BSF staff member provided several reasons, including CARB requirements:

> *The issue was just being able to provide sufficient data since this is the first time we've ever done a program like this and had a loan loss reserve for, you know, equity in mobility or clean technology mobility. They [CARB] wanted more data.*

BSF staff reflected on other factors at play that resulted in inadequate participation in the financing offering, including that they did not advertise the loans — or the importance of fair financing — as much as they could have. BSF staff also shared how many different considerations there were for this program, as well as challenges navigating decision-making at various levels, which all ultimately affected the loan acceptance and uptake rate.

Program data corroborate these challenges, demonstrating that only three percent of CVAP participants received a loan through the program's preferred lender.[16] A community advisor cited potential negative impacts on the borrower's financial wellness:

> *You could participate in the program for the buy down, but go get your separate loan, and that separate loan could have been as high, I think at some point was like 16 percent or maybe was a little bit higher, putting folks in a worse position.*

The low participation rate also reflects the fact that some participants were able to receive lower-interest loans elsewhere and did not need the loan services of Beneficial State Bank.

A community advisor also stated that "*I don't think we've yet to develop a true financing program to help support folks, I think, in a meaningful way.*" When prompted to recommend what was needed, the interviewee suggested the state could take lessons from successful programs such as the California Capital Access Program for Small Business, which successfully leverages a loan loss reserve. They also highlighted the importance of transparency and coordination across stakeholders, stating:

> *There's still a lot of missing pieces to this conversation that might be happening behind closed doors, but not [being shared with] advocates or partners in this space to have a better understanding that can then shape what this financing program could look like.*

Notably, BSF interviewees agreed that they saw significant success near the tail end of the program after several program elements were modified (the previously mentioned soft launch phase) and highlighted the need to bring these successes into future program iterations, asserting:

> *We saw an initial jump from the seven percent [loan] acceptance rate all the way up to 27 percent ... but unfortunately [the program closed] .... I felt like it was on track to be close to 50 percent acceptance rate of all applicants. And that's huge ... that's a big number for people to get a loan with [the program's preferred lender] at an eight percent guaranteed rate when, you know, they were qualifying for [15 percent or more, often greater than 20 percent] with the dealer. So, a lot of research took place. There's a lot of data that CARB has now and we were able to prove that an increased percentage to the loan loss reserve and more flexibility to the underwriting had a significant impact on the acceptance rate for these loans.*

Indeed, an analysis of data from the soft launch period (June 2023 – May 2024) — after the loan decision model was redesigned — demonstrates that approximately 20 percent of CVAP grant recipients received funding through the preferred lender, compared to the three percent for the overall lifetime of the program.

The potential benefits of low-interest loans aside, one participant also experienced challenges with a dealer attempting to upsell with add-ons that would increase the total purchase amount beyond the participant's approved loan amount. This was a stressful experience for the participant and ultimately does not align with the equity objectives of the program. As mentioned previously, BSF developed educational materials to protect participants from these predatory practices. This issue is also likely to persist under DCAP unless addressed head-on.

Provision of direct assistance. Administrators can support community members through each step of a given program's application process through case management. Direct assistance can also present an opportunity for residents to learn how to apply for these types of government-funded incentive programs, which may increase their confidence in submitting future applications to other programs. For CVAP, case management support was primarily offered through BSF. One community advisor specifically mentioned challenges in BSF's case management for tribal communities, as participants waited for weeks on end and did not receive updates from the program administrator. BSF staff acknowledged that, while they were available to address general inquiries, application backlogs frequently led to significant uncertainty regarding application status and timelines, making it difficult to provide clear answers to those waiting for responses. BSF staff also noted that they experienced upstream delays in high-level communication due to CARB approval requirements. In a later phase of the program, direct assistance for a limited number of customers was also provided through community partners at a regional level (e.g., Metropolitan Area Advisory Committee on Anti-Poverty of San Diego County, Inc. and Central California Asthma Collaborative in the Central Valley), which supported BSF staff.

Additionally, as stated previously, BSF staff praised one of the partnering CBOs for their support with case management for hardship cases, despite these only representing a small portion of CVAP participants. One of the participants we spoke with received application support from the CBO, but the participants largely indicated that the CVAP application was straightforward and that they did not require much case management. This may partially reflect the population reached through the CVAP program: most participants we interviewed sought out incentives themselves, did their own research, and had good comprehension of how these programs worked and how to apply.

Another distinct challenge with this type of clean transportation equity program was that the intended recipient population was mainly focused on having a reliable form of transportation, with any positive environmental impacts being a secondary consideration for them. BSF staff recalled difficulty explaining to CARB that without concerted support the program enrollment process could be seen as a barrier to potential participants, stating "*So [participants in need] would just move forward and get a loan and do financing on their own outside of the program. Those are the issues we were facing was participants' reality versus ours.*"

Community development through partnerships. Though CBO partnerships provide opportunities for community development and support, as previously mentioned, the CVAP program had a limited outreach budget and only formed two substantial community partnerships in the later years of the program. BSF acknowledged that these challenges stemmed from the limited funding for administration that their organization had been allocated.

Respect and Recognition of Diverse Perspectives

Incorporating feedback from partners. CVAP had multiple community advisors who provided feedback on the program before and during implementation, providing opportunities for respect and recognition. Throughout one interview, an advisor discussed several meetings with CARB and program administrators where they provided advice, but also highlighted the areas in which the program fell short:

> *We became a little bit concerned ... because it didn't quite feel like a financing program. It felt more like just another incentive program, with the buy down [grant] and then option for the financing. But most folks were just taking advantage of ... the buy down money, not necessarily the financing piece of it.*

They also mentioned conversations about a needs-based approach that was never realized (despite BSF's interest in implementing such a program design), stating:

> *From my understanding, and the conversations I had with the Air Resources Board and even with [BSF] staff, was that [the Tesla website] was the path that folks were using to access the incentive and therefore depleting the money that was available at that time — there was no set asides, not anything, within the program. We had conversations about some type of need-based approach, but nothing had been, I think, fully developed for that and led to the program going dark*.

As mentioned previously, the inclusion of CVAP on Tesla's website was not approved by BSF and this was happening outside of their control, with BSF staff stating, "*the market and resources of Tesla overshadowed ours*."

Meaningful engagement to address community-specific barriers. Our interview with a community advisor from an organization focused on supporting Native American tribal communities highlighted the acute importance of increasing engagement to meet the needs of communities with different cultural backgrounds and priorities. Programs such as CVAP have more work to do in partnership with tribal communities to identify novel financing methods, as these communities have very specific needs in terms of credit program design due to medical debt and other lived experiences.

While BSF had expertise through the community engagement manager, they ultimately did not have enough funding to engage meaningfully with communities. BSF's community engagement manager stated that people can "*get caught up on all these like optics things, you know, the snazzy flyers, the cool pamphlet and all the cool swag. When the reality of the situation is that folks are looking for meaningful connections*."

Access Clean California (ACC)

The original approach for ACC was drawn from the concept of one-stop-shops, which involve the provision of multiple services or products in one location, increasing efficiency and supporting multiple customer needs. ACC grew out of the California Senate Bill 350-commissioned Barriers Report,[8] [18] which recommended regional one-stop-shops to address the "*lack of coordination across various incentive programs.*" However, program staff and partners learned that the one-stop-shop as initially envisioned, involving submitting applications for multiple (ideally all) benefit programs through a single portal, was incredibly challenging to implement due to the number of program partners and coordination required. One CARB staff member stated:

> *I think the idea — probably naively — was that we could create a true universal application.... The reality, after several years of trying to get the various program administrators to agree to that and to provide their resources and access ... [is that] it's very difficult to have that kind of deep collaboration and sharing of data.... What we realized is that the model is not going to be a universal application, rather just helping to streamline where we can.*

[8] Original funding for the one-stop-shop pilot program was through the Volkswagen defeat devices settlement.

CARB staff further described their perspective on ACC's current value and focus: *"What we think is the most important part right now...the sort of central part of the program is a network of outreach partners, and those are primarily community-based organizations."* The reason for this is that *"community groups are trusted in the community, they know how to speak to their community and so on, rather than coming from [CARB]."*

GRID Alternatives staff noted that as program administrator their team manages three primary components of the program. The first is developing and sustaining the outreach partner network. The second is managing the "Benefits Finder," a web platform that allows potential participants to explore the different incentives that they might be eligible for in one place and to submit information to verify their income eligibility for those programs. The third aspect is their case management program: GRID has case managers who conduct the income verification process and help potential participants understand what all the different programs offer, and how to take next steps to receive incentives.

Participation and Inclusiveness

Outreach partner network and associated innovation and adaptation. ACC sustains a large outreach partner network with nearly 30 collaborating organizations. Interviewees highlighted the novelty and strength of this statewide network, which program staff have successfully built primarily through tapping into existing networks and relationships that CARB and the program administrators had with CBOs. This approach recognizes that a "one size fits all" mindset is not appropriate for community engagement and outreach and provides the resources for each community partner to develop their own preferred outreach plan based on their community. As mentioned previously, CARB now sees the outreach partner network as the core of ACC, evolving from the initial goal of developing a web platform for submitting multiple benefit applications. CARB is currently working with GRID Alternatives to grow the network: *"There's just under 30 partners now .... We want to continue to grow that and then give those organizations the training and funding resources they need to conduct the outreach."*

Community partners described using very different outreach methods from one another. One described community creative writing workshops where they talk about ACC and the organization's other programming, whereas another partner emphasized the importance of weekly informal chats with community members at the organization's office to walk through the programs offered through ACC and provide one-on-one education. GRID Alternatives asserted that continuous adaptation led to the current approach in which "*the outreach team developed the tailored scope of work in collaboration with each individual partner to make sure that that outreach scope will resonate [with each community].*"

Apart from innovation in outreach, community partners also highlighted GRID Alternative's flexibility and willingness to adapt throughout their partnership, described in more detail in Section 3.2.3.

Maximizing opportunities for benefit distribution through ACC. The extent to which available benefits are offered and utilized serves as a key measure of program participation. While there may be significant outreach being conducted statewide by the regional community partners, a method to quantify program benefits received through ACC does not yet exist seven years into the program. The program does not currently track how many individuals have received incentives or discounts from specific programs after income verification through ACC, though interviewees reported they are working on developing the channels to report those numbers. Additionally, while ACC has successfully developed an outreach network, facilitating partnerships to direct funding to households in communities across the state, the reported number of income verifications suggest minimal success in distributing benefits to individuals through ACC outreach itself. For example, in 2022, ACC reported only 136 income verifications despite a 20-member outreach partner network at the time,[19] though this number increased to 589 for 2023. [20] A recent public presentation on ACC stated that there have been approximately 1,500 income verifications over the lifetime of the program.[21]

Additionally, the utility of ACC income verification was questioned by several program participants, who expressed concerns about being required to obtain income verification outside of ACC for each individual program they applied to. One participant reflected on this experience, stating *"that was where I got a little confused...I thought I already got income verification."* This inefficiency may simply be because the benefit programs are not integrated on the ACC platform itself.

A former equity advisor for ACC reflected on the implications of the lack of quantifiable benefits achieved by the program, stating that

> *[equity programs] require that outreach, require case managers, and so in the eyes of legislators ... these programs are not cost effective they because they require that additional support. And so, it is a balance .... With that in mind, we do need to be really effective with the limited resources that we have. And I think [ACC] is missing that mark right now. And I think we just need to really evaluate whether that's something that we need moving forward or not*.

Additionally, as noted with CVAP, some interviewees expressed the view that intermittent and unpredictable program closures in the ACC network (resulting from limited funding and the way programs are administered and budgeted) reduced the impact of ACC on actual benefit distribution. In fact, one CBO in the outreach network noted that, despite consistently conducting education and outreach for several years as part of ACC, they were unaware of anyone in their community — reached through targeted outreach — who has accessed program benefits, primarily due to limited funding in programs promoted by ACC. One participant also noted "*I really liked [the ACC website]. It did give me a summary of the benefits that I was eligible for...[but] it wasn't always accurate because some of the programs had been closed.*"

Interestingly, partners from the outreach network had differing mindsets on the challenges associated with those closures. One approached it as an opportunity to educate, stating:

> *Even though it seems like there's not a lot going on, this is the perfect time for us to be engaging with the community, for us to be providing this education and workshops, because it's when we prepare the community to be open, to start planning.*

Others felt that the mismatch between education and actual available program offerings can lead to confusion for potential program participants, particularly folks with an urgent need to purchase a vehicle, as in the case of CVAP.

Community and Individual Economic Resilience

Program bundling opportunities. Providing interested households with the ability to determine eligibility and apply to multiple programs is a core component of the original one-stop-shop concept, and an opportunity to support participants on an individual economic level. Most participants we spoke to were able to stack more than one incentive and receive multiple types of benefits for their vehicle, though it varied based on regional program offerings. While the participants we interviewed were able to cite this success, the lack of program data prevents a broader understanding of exactly how many customers have been able to combine multiple incentives through ACC. The participants also cited the importance of both ACC as well as the general existence of the various individual programs in helping them to purchase a clean vehicle, with one stating, "*Life is already expensive. And then buying ... a car ... without these programs, like, it would have just added more to that. You know, so, no, I wouldn't have gotten one*."

Community development and capacity building through partnerships. Supporting local community organizations to enhance their outreach and support can in turn support community development. One CBO we interviewed described the importance of this: *"We started as a, you know, capacity building [organization] ... building the capacity of our communities so that they can ... recover from the effects of environmental racism.*"

ACC continues to offer a capacity-building pilot for particularly under-resourced CBOs that includes direct funding, training, and resource provision. As described by GRID Alternatives, this program enables them to provide stable funding to participating organizations so that they're able to build longer-term capacities and empower their communities to get engaged in clean transportation initiatives. After these organizations go through the technical assistance and capacity building program, they're given the opportunity to enroll in the ACC outreach partner network. A community partner echoed this sentiment, stating that the capacity building pilot's

> *primary goal was not necessarily an outreach vehicle. It wasn't a mechanism or a vehicle for outreach in and of itself, but it lended itself to outreach in the sense that some of the CBOs that participated in that then went on to become outreach partners and those [organizations] may not have gotten into that position if it weren't for that capacity building fellowship.*

Another partner described their positive experience with the pilot: *"There was a lot of collaborating with other nonprofits ... and I think there was a lot of learning on our part about the electric vehicle program[s].*"

However, we note that the level of participation within that program varied by outreach partner as well, with one CBO who did participate reflecting that *"the options that we've had as far as building our capacity and getting people involved with the programs has been limited just due to funding.*"

There also appears to be a lack of strategic connection between the location of these CBO partners and the availability of incentive programs. For example, several of the CBOs represent regions that have had limited access to equity-focused incentives beyond the CVAP program, which as previously noted was not always available.

Apart from the capacity building pilot, smaller CBOs report that participating in ACC supported them in other meaningful ways. One community partner described how ACC implementers have approached providing flexible financial support to CBOs to meet their needs, including being

> *able to pay people more frequently and for the things that they do ... in a timely manner, so they're not taking on financial risk just to do the outreach work. So those are all things from the beginning that were priorities for the program.*

A CBO reiterated GRID Alternative's flexibility and support in developing a more feasible billing cycle, stating:

> *The biggest challenge for small nonprofits like us is we want to be able to serve our communities. We want to be able to be involved and do this work and get paid for our work. But a lot of these outreach contracts, which we've done a few, they don't pay us for 3 to 6 months ... that's one of the things that GRID helped us out with.*

Provision of direct assistance. Case management should be a critical component for equity programs such as those promoted through ACC, which are designed to reach households that often face added barriers to application and participation. As stated by GRID Alternatives, "*Often these programs are really complex and have multiple parts ... sometimes you're also scrapping your car, and there's extra documentation.*" The GRID Alternatives case management team reported supporting both with the ACC income verification process as well as by providing support to participants applying to individual incentive programs outside of the platform as best they can. This includes following up with participants several times throughout the income verification process, post-income verification, and being in direct communication with case management teams on the program administrator side as needed. However, participants reported working primarily with program administrators or other partners (one cited a community organization) rather than with GRID Alternatives, though this may be because the income verification process through ACC was quick and straightforward (as described by several participants we interviewed), and case management may not have been required by these customers. Some, but not all, of the ACC community partners have case management within their scope of work, so that is another possible reason.

Respect and Recognition of Diverse Perspectives

Response to feedback from partners. As stated previously, program response to feedback can also in turn influence decision-making, a core aspect of procedural equity. Interviews shed light on the strengths and challenges of ACC with respect to taking and incorporating program feedback. Community partners within the outreach network reported a strong sense of support from GRID Alternatives, especially regarding financial and administrative challenges and providing resources (as previously discussed) and indicated that GRID Alternatives staff were responsive to their needs, especially those unique to small, grassroots organizations. At the same time, the nature of the administrator-community partner relationship and level of support varied by partner. One CBO offered the view that:

> *Working with GRID has been like my best experience so far ... how adept they are to change and how fast they process information .... It was really easy for us to access information and get our answers, ask questions, of course, and talk about the things that that we think are important.*

Another community partner asserted that ACC has facilitated new opportunities for communities to engage with CARB as part of a "*community of practice*."

However, at a higher program design-level, an interviewee from an organization that was a former ACC partner and equity advisor cited challenges with supporting the program, indicating they stepped aside after several years partnering on the program because their feedback was not taken into account as the program evolved:

> *We were providing guidance into ... the development of this one stop shop. And [the platform not being feasible] was not on GRID [Alternatives]. But I think just overall seeing that that type of integration, even with our input, wasn't happening.*

They noted that they *"weren't seeing the outcomes that we wanted to see from when we started to engage. So that's why we ended up pulling back."*

Meaningful engagement to address community-specific barriers. The decision to develop an outreach partner network as opposed to a more centralized approach is inherently more supportive of diverse populations and regional differences between communities. The design of the outreach partner network, as it has evolved, allows for regular dialogue between GRID Alternatives and the community partners and supports the partners in engaging with their community to address barriers to participating in clean transportation incentive programs, using the most appropriate outreach methods for each community.

Conclusion and Recommendations

In this study, we analyzed program implementation in two innovative statewide clean vehicle programs through the lens of three aspects of procedural equity: participation and inclusiveness, community and individual economic resilience, and respect and recognition of diverse perspectives. The findings presented here can contribute to both policymakers' and advocates' efforts to enhance specific program implementation strategies. They can support a broader understanding of the challenges and opportunities in procedural equity for climate-focused benefit programs, including complex, limited funding programs that will be critical in realizing a just transition to clean transportation and energy.

The Clean Vehicle Assistance Program, or CVAP, was a pilot program operating from 2018–2024 and was designed to provide underserved households with low-interest financing and vehicle buy-down grants. Throughout its implementation, CVAP faced many administrative challenges: sporadic availability of funding resulted in program closures, which in turn led to strained partnerships. While interviews we conducted emphasized that the individuals and organizations designing and implementing CVAP had strong intentions of developing an equity program, the program fell short in several ways. CVAP had a limited community engagement budget, and while program staff worked with several CBOs in the later years of the program and cited successful partnerships, this outreach did not have nearly as much of an impact as was desired. Ultimately, less than 25 percent of CVAP incentive funding reached state-identified DAC census tracts. Additionally, while CVAP was originally envisioned as a financing program, the buy-down grants were utilized more, with only three percent of participants receiving low-interest financing from CVAP's preferred lender, though there were improvements on financing uptake in the final iteration of the program. Interviewees who remain engaged with CARB's newly launched DCAP program, which will also offer financing, underscored the vital importance of bringing lessons learned into the new program to avoid revisiting the earlier program's shortcomings. However, it was outside of the scope of this report to discuss detailed plans for, or implementation of, DCAP with interviewees. Accordingly, we do not have additional insights to provide on DCAP implementation here, except to reiterate that substantial changes will need to be effected and their success evaluated in order to justify the new program being a focal point of clean vehicle equity investments at the state level, versus programs like CC4A which have demonstrated measurable success.[15]

Access Clean California, or ACC, was conceived with an explicit goal of developing a one-stop-shop to apply for clean transportation benefit programs, yet has evolved into focusing on building and sustaining a statewide community outreach partner network. Interviews we conducted highlighted the novelty of the outreach network and relational approach in a top-down statewide program, as well as strong partnerships with several CBOs. However, with $22 million expended (as of fiscal year 2023-2024) and the concept of a true one-stop-shop web platform not yet achieved after seven years, questions about the program's net benefits — and success in distributing incentives more conveniently — remain.

Based on these findings, we propose several recommendations to increase equity in program design and implementation, shown in **Figure 3**.

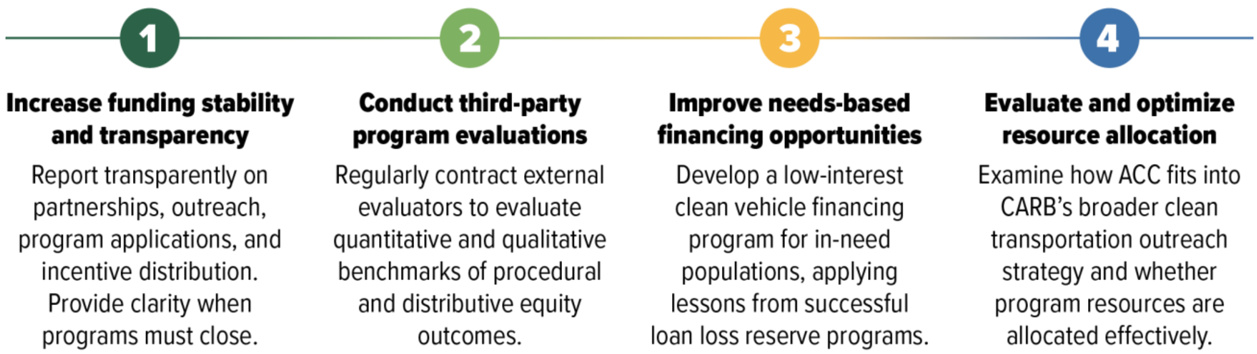

Figure 3. Key recommendations

Increasing transparency is one overarching recommendation with multiple dimensions at different scales. We suggest that program partners develop the necessary pathways to increase transparency in reporting program outcomes, particularly for the distribution of incentives through ACC. We also encourage reporting on the details of the outcomes of CBO partnerships, including how organizations in regions without many active programs maintain education and outreach, and how many individual program applications are submitted through ACC CBOs. Strategic planning to avoid program closures due to lack of funding should be prioritized, but when closures are inevitable, there needs to be more clarity and communication to avoid downstream effects on partnerships and participation.

We encourage regular third-party evaluation for qualitative and quantitative benchmarks of progress, going beyond the typical annual impact or program evaluation report, as novel programs need to be regularly evaluated on multiple aspects of equity. These analyses will enable CARB and partners to apply lessons learned to newly developed and evolving programs, particularly as CARB is in the early stages of implementing DCAP, which will also offer financing.

Our interviews on the CVAP program emphasized the need for the development of a more equitable financing program, citing the need for public dialogue between advocates, and other stakeholders — including lenders — and taking lessons learned from other efforts successfully utilizing loan loss reserve programs. In particular, we recommend an external review of the details and procedures for future or planned programs by finance experts and stakeholders with backgrounds in financial inclusion.

Finally, we recommend that as CARB develops a new strategic plan to expand the ACC outreach partner network, the agency should also consider where they are expending program resources for ACC and whether reallocation should be considered. Our interviews highlighted the fact that the state has limited resources for these programs, and considerable funding is required for outreach and case management for impactful implementation of equity programs. This raises a few key questions:

> First, how does the ACC network fit into CARB's broader outreach strategy for their suite of transportation programs, and has it replaced separately funded outreach networks for the individual programs to enhance cost-effectiveness? We note here that CARB also operates the DriveClean

website, which has an incentive search function which seems to provide similar information to the ACC Benefits Finder.

Second, if ACC cannot serve as a one-stop-shop program as originally envisioned (making income verification duplicative, rather than streamlining program application efforts), are there opportunities to invest in stronger aspects of the program rather than maintain the income verification process? [9]

Ultimately, the state needs to route more consistent funding at a much higher order of magnitude to clean vehicle incentives, and make a concerted effort to distribute those resources to the most in-need populations.[15] The recently vetoed Assembly Bill 2401 provided several tangible suggestions to ensure these objectives were met, including a means-based strategy to identify recipients.

Given recent federal backtracking on clean energy and transportation investments, California is in a unique position to continue and expand its national leadership in clean transportation. The state's clean transportation incentive policies and associated programs are also a key factor in supporting a statewide equitable energy transition.

Equity in these endeavors, however, has been lacking. Increasing equity has, and will continue to, require innovative program designs that meaningfully incorporate insights from program partners and advocates. With the large and continually growing outreach partner network developed through ACC and other programs such as CC4A, CARB and program administrators should be well-poised to advance both procedural and distributive equity in their suite of programs but must critically reexamine funding priorities and program design strategies to ensure targets are met.

[9] On February 26, 2025, CARB held a *Public Workgroup on Access Clean California*, where they proposed removing the income verification component of the program (https://ww2.arb.ca.gov/events/public-workgroup-access-clean-california-program).

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