



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

March 28, 2023

OFFICE OF THE
CHIEF FINANCIAL OFFICER

MEMORANDUM

SUBJECT: Inflation Reduction Act, 2023 Advice of Allowance

FROM: Maria Williams, Director
Office of Budget

TO: Mission Support Division Directors
Senior Budget Officers
Regional Comptrollers

***** PLEASE DISTRIBUTE TO APPROPRIATE STAFF *****

This memorandum provides guidance for EPA's implementation of the *Inflation Reduction Act* (IRA) (Public Law 117-169), that President Biden signed into law on August 7, 2022. The IRA appropriated approximately \$41.5 billion to support the Administration's historic commitment to advance environmental justice in overburdened communities, deliver clean air, and reduce climate pollution. As with previous supplemental appropriations, we anticipate close and continued review from the OIG, GAO, OMB, and Congress to ensure that these funds are used effectively, efficiently, and as intended under the law. It is the responsibility of Mission Support Division Directors and Senior Budget Officers to ensure that Agency funds are spent in a legal and appropriate manner.

This document and other IRA guidances will be posted on the [IRA Resource Guidance SharePoint](#) to help the community track and locate guidances. If you have access issues, please contact RPROS@epa.gov. Offices are also encouraged to use the Financial Dashboard to track IRA resources. Status of Funds Financial Dashboard. This document will be updated as administrative, budget, and financial processes are updated. Since IRA funds were all appropriated at once, the agency will update this Advice of Allowance to reflect policy and process refinements rather than issuing separate updates.

Funding Levels

The IRA provides funding for several Environmental Protection Agency (EPA) programs to clean up harmful air pollution in places where people live, work, play and go to school. In FY 2022, IRA provided the EPA \$41.5 billion. This funding is distributed as follows:

Environmental Programs and Management: \$3.54 billion

Period of Availability	Envionrmental Program and Management (EPM)	Amount (\$ in Thousands)
10 Year	60107 - Assessment	1,000
	60107 - Consumer Education	17,000
	60107 - Implementation / Accountability	18,000
	60107 - Industry Outreach	17,000
	60107 - State/tribal/local gov't outreach	17,000
	60107 - Technical Assistance for Low Income Communities	17,000
	60110(a) - Funding for Enforcement Technology and Public Information - Compliance Monitoring	18,000
	60110(a) - Funding for Enforcement Technology and Public Information - Inspection Software	4,000
	60111 - Greenhouse Gas Corporate Reporting	5,000
	60112 - Environmental Product Declaration Assistance	250,000
	60106(b) - Funding to Address Air Pollution at Schools -Technical Assistance	12,500
5 Year	60109(a)(1) - Funding for Implementation of the American Innovationand Manufacturing Act	20,000
	60109(a)(2) - Implementation and Compliance	3,500
	60115 - EPA Efficient, Accurate and Timely Reviews	40,000
	60116 - Low Embodied Carbon Labeling for Construction Materials for Transportation Projects	100,000
	60201(1) - Environmental and Climate Justice Block Grants	2,800,000
	60201(2) - Environmental and Climate Justice Block Grants - Technical Assistance	200,000
Envionrmental Program and Management (EPM) Total		3,540,000

State and Tribal Assistance Grants: \$37.9 billion for State and Tribal Assistance Grants.

Period of Availability	State and Tribal Assistance Grants (STAG)	Amount (\$ in Thousands)
10 Year	60101 - Clean Heavy Duty Vehicles in Nonattainment Areas	400,000
	60101 - Clean Heavy-Duty Vehicles	600,000
	60103(a)(4) - Greenhouse Gas Reduction Fund - Administrative Amount	30,000
	60104 - Diesel Emissions Reductions	60,000
	60105(a) - Fenceline Air Monitoring and Screening Air Monitoring	117,500
	60105(b) - Multipollutant Monitoring Stations	50,000
	60105(c) - Air Quality Sensors in Low Income and Disadvantaged Communities	3,000
	60105(d) - Emissions from Wood Heaters	15,000
	60105(e) - Methane Monitoring	20,000
	60105(f) - Clean Air Act Grants	25,000
	60105(g) - GHG and Zero Emission Standards for Mobile Sources	5,000
	60106(a) - Funding to Address Air Pollution at Schools - General	37,500
	60110(b) - Funding for Enforcement Technology and Public Information - Communication with ICIS	3,000
	60114 (a)(1) - GHG Air Pollution Planning Grants	250,000
3 Year	60103(a)(1) - Greenhouse Gas Reduction Fund - Zero Emission Technologies	7,000,000
	60103(a)(2) - Greenhouse Gas Reduction Fund - General Assistance	11,970,000
	60103(a)(3) - Greenhouse Gas Reduction Fund - Low Income and Disadvantage Communities	8,000,000
5 Year	60109(a)(3) - Competitive Grants	15,000
	60114 (a)(2) - GHG Air Pollution Implementation Grants	4,750,000
6 Year	60102 - Grants to Reduce Air Pollution at Ports	2,250,000
	60102 - Ports in Nonattainment Areas	750,000
7 Year	60113 (a) - Methane Emissions and Waste Reduction Incentive Program	850,000
	60113 (b) - Methane Emissions and Waste Reduction Incentive Program - Conventional Wells	700,000
State and Tribal Assistance Grants (STAG) Total		37,901,000

Science and Technology: \$15 million

Period of Availability	Science and Technology (S&T)	Amount (\$ in Thousands)
10 Year	60108(b) - Funding for Section 211 of the Clean Air Act - Advanced Bio Fuels	10,000
	60108(a) - Funding for Section 211 of the Clean Air Act - Test and Protocol Development	5,000
Science and Technology (S&T) Total		15,000

Period of Availability and General Requirements

Availability of IRA Funds

The IRA was appropriated in a single fiscal year (FY 2022) with various periods of availability (3, 5, 6, 7, and 10-year). The funds will remain available for new obligations through the Ending Budget Fiscal Year (EBFY) for each fund/appropriation.

Immediately following the EBFY each fund will enter the expired phase for an additional 7 years. During the expired phase the funds are only available to pay bills and adjust obligations that were made during the available period.

At the conclusion of the expired phase the appropriations will be cancelled or closed out. During the cancelled phase bills or invoices received against cancelled appropriations must be paid from current appropriations available for the same purpose. It is important for offices or programs -to close out all payment activity within the 7-year expired phase to avoid a potential violation under the Anti Deficiency Act (ADA).

Unlike the infrastructure law, there are no future appropriations provided by the IRA. A significant portion of these funds must be obligated within a short period of time – specifically, \$26.97 billion in STAG Categorical Grants must be obligated by September 30, 2024.

Available for Obligation			Start of Expired Phase	Funds are Cancelled
BBFY	EBFY	Years of Availability		
2022	2024	3 Year	2025	2032
2022	2026	5 Year	2027	2034
2022	2027	6 Year	2028	2035
2022	2028	7 Year	2029	2036
2022	2031	10 Year	2032	2039

Carryover and Recertification of IRA (Multi-Year Funds)

Like EPA regular multi-year funds (EPM, S&T, & IG), the IRA multi-year funds **are not** subject to the recertification and annual carryover processes. The funds will retain their original Budget Fiscal Year (BFY) identity until expended. Unexpired balances will automatically roll over in Compass and be available for spending up to the apportioned levels.

Travel Ceiling

There is no travel ceiling for IRA funds. Offices may move funds into or out of travel BOC 21 based on the actual realized need in support of the work, while abiding by the administrative set-aside ceilings.

Operation of Aircraft Prohibited under IRA

IRA appropriations do not provide authority for EPA to operate aircraft.

Budget Load in Compass

IRA funds are loaded into Compass with the appropriate accounting information. Budget Formulation System (BFS) version 8.0 2022 OPP 30.0 provides the final information used for the budget load.

IRA Charging and Program Integrity

The IRA requires an unprecedented level of transparency and accountability in the execution of these resources. It is imperative that RPIOs align charging with the work performed and ensure the execution of funds is consistent with the time, purpose, and amounts stipulated in the appropriation bill language. The program project and RPIO Activity codes track the purpose of all IRA funds for this reason. **Attachments A, B, and C** include details on the new fund codes, RPIO activity codes, and allowance holder codes that will be utilized to control, track, and execute the IRA funds and FTE. If your RPIO requires additional allowance holders, contact Andrew Cardenas or Gary Lane.

Offices **may not** mix IRA funds in reporting or execution with other sources of funding and resources must be tracked separately with the established IRA codes. RPIOs are to ensure the use of funds can always be tracked to the purpose in the appropriation, as is provided in the established coding schema. With no exception, IRA funds may not be “tapped” for needs outside those covered under the law and as determined in developing the annual spend plan. Further, indirect enabling support work should use indirect cost allocations and direct work should use direct charging as appropriate.

IRA beginning availability for charging

IRA carryover into FY 2023 was apportioned and made available for obligation on October 1, 2022. Offices may submit timecard corrections going back to October 2022 pay period 22/2022, the first full pay period of FY 2023. We ask you give a heads up to the OCFO_OB_Payroll@epa.gov prior to making corrections and that any IRA related timecard corrections be completed no later than **April 7, 2023**.

Use of Flexibility where provided in the Statutory Text

Five IRA sections include both administrative set asides and additional language that appropriated funds may be used to “carry out” the program or for “other activities”. EPA will interpret this language such that enabling support functions and programmatic oversight and administrative needs will be funded from the set aside, and purely

programmatic work with no administrative nexus can be funded from outside the set aside, consistent with the flexibility provided in the IRA language. OCFO will continue to work with OGC and involved offices to develop a consistent definition of application where this flexibility exists.

IRA sections with this flexibility include the below:

1. 60101 Clean Heavy-Duty Vehicles
2. 60107 Domestic Electricity Programs
3. 60112 Environmental Product Declaration Assistance
4. 60114 Air Pollution Planning and Implementation
5. 60201(2) EJ Block Grants Technical Assistance

The Office of Budget Status of Funds Financial Dashboard is available to assist the community with monitoring IRA resources. [Status of Funds Financial Dashboard](#)

Split Funding / Multiple Appropriations

For the purposes of split-funding (multiple appropriations), IRA Funds are treated as “separate” from annual appropriations because the IRA funds are only legally available for activities specified in the IRA statute. This policy is the same as the guidance for [Infrastructure Investment and Jobs Act P.L. 117-58](#) funds since these are also considered separate appropriations. This means that IRA funds (including IRA-EPM and IRA-STAG funding) are considered separate appropriations from EPM or STAG funds from an annual appropriation or from IJA.

Similar to IJA, each IRA line item had distinct purposes laid out in the statute. Dissimilar to IJA, all of the IRA line items had distinct purposes from other appropriations. The funding rationale will need to be recorded on each procurement using an IRA line item and any other source of funding, even if the other funding is another IRA line item. (Note this section will be updated as OCFO and OMS update processes.)

For example, the “Greenhouse Gas Reduction Fund” program has a different purpose from other funding – to provide competitive grants to mobilize financing and leverage private capital for clean energy and climate projects that reduce greenhouse gas emissions – with an emphasis on projects that benefit low-income and disadvantaged communities. To document the rationale for split funding, Offices must submit a form requesting approval for use of multiple appropriations that explains how the proportion of IRA funds being used is proportional to the IRA work being performed on that action.

RMDS 2520-04, Multiple Appropriations of Non-Direct Allocable Costs provides agency offices procedures to submit required information to obtain approval for use of multiple appropriations. Prior to the use of funds, when more than one appropriation will be used on a single procurement obligation staff should upload the required document(s) into the [Multiple Appropriations Request Tool](#).

Grants

Per EPA Order 5730.2, the policy is generally to use only one appropriation as the funding source for an assistance project. (The term “grant” is understood to include grants and cooperative agreements.) Where a project’s activities benefit more than one appropriation, the Agency should award separate grants for the activities falling within the scope of each appropriation. However, a single, multiple appropriation grant may be awarded, with adequate justification documented in the Funding Recommendation, and on an *exception basis*, if all of a project’s activities are of a type that is fundable from all the supporting appropriations. Separate grants must be awarded if all the supporting appropriations are not legally, available for all of the types of activities to be performed. In awarding and administering separate grants, the Agency will work to minimize application, accounting and reporting burdens on recipients.

OGD issued [PN-2022-G03: Funding Assistance Agreements with Infrastructure Investment and Jobs Act Appropriations and Other Appropriations](#) to provide guidance on awarding financial assistance agreements funded by IIJA, including the use of multiple appropriations on a single award, and is preparing additional guidance to cover use of IRA funds as well.

Interagency Agreements (IAs)

OGD issued [PN-2022-I01-R1: Funding Interagency Agreements with Infrastructure Investment and Jobs Act Appropriations](#) to provide the requirement to use separate stand-alone IAs for funding appropriated by BIL and is preparing additional guidance to cover use of IRA funds.

Key take aways for Split-Funding:

1. Split-Funding (Multiple Appropriations) approval is required for IRA funds.
2. Funding across different IRA sections would also require a multiple appropriations approval.
3. Guidance for approval of multiple appropriations is contained in RMDS 2540-02-P4, Multiple Appropriations of Non-Direct Allocable Costs.
4. Approval request(s) for Multiple Appropriations are submitted on the Office of Controller SharePoint site via the [Multiple Appropriations Request Tool](#).
5. Funds Control Officer or Senior Budget Officer must approve the request package.

For additional questions Contact the Financial Policy and Training Branch at ocfo_financial_policy@epa.gov

IRA Administrative Funds

The IRA law establishes administrative set asides to be used for “salaries, expenses and administration.” All administrative ceilings are controlled in the budget system using the level 1 fund code with an “A” at the end. Where there is no statutory administrative ceiling, administrative costs are tracked using the allowance holder. The agency will need to report on the use of all administrative funds whether there is a ceiling or not. Offices must charge all administrative work to the established fund and allowance holder codes for their programs. Additionally, offices must be consistent in charging the same type of work in the same way. For example, indirect work (work that supports multiple programs, as an example legal advice)

should use indirect payroll cost allocation coding and direct work (work that aligns completely with one specific program, as an example directly implementing the GHG Fund) may use direct codes.

It is critically important that all RPIOs pay close attention to the coding, tracking and execution of administrative funds. The agency will be closely monitoring the use of these funds and we expect scrutiny on the use of administrative funds.

Please contact OCFO_OB_Payroll@epa.gov if your RPIO needs assistance with Administrative Allowance Holder codes.

Management and Oversight Program Project

The administration of infrastructure funds requires mission support functions across programs, such as human resources, grants administration, financial management, or legal advice. The IRA Spend Plan mirrors the approach of the American Recovery and Reinvestment Act and the Infrastructure Investment and Jobs Act and use the Management and Oversight (M&O) program project (code MM) to clearly track, execute, and report on enabling support funds. All resources and FTE in OMS, OCFO, and OGC will continue to operate entirely from the Management and Oversight program project. The IRA includes many explicit administrative amounts for specific purposes, the agency will continue to track and control for each purpose with a unique RPIO Activity Code identifier included in the program results code of all MM PRCs. Note that OA operates in the Management and Oversight program project where they are providing a support role and outside of it where they are the lead implementing national program, for example in the GHG Reduction fund. M&O funds may be used for: payroll, travel, working capital fund, and extramural needs.

Payroll Charging for IRA

Offices Must Strictly Manage Payroll in IRA

The Inflation Reduction Act is a one-time appropriation. It does not provide multiple years or recurring appropriations, like EPA's regular annual operating plan or the Infrastructure Investment and Jobs Act. Payroll funds provided in the IRA operating plan will not be replenished and represent the total available payroll for the lifetime of the IRA. FTE ceilings included in the IRA operating plan correlate to the "Lifetime FTE" for the program. This is an important distinction from other budgets that provide annual FTE ceilings. Lifetime FTE are the total cumulative full-time equivalents available over the entire duration of IRA implementation.

Programs must manage their payroll and FTE such that there is a glidepath to not exceed the lifetime FTE ceiling. This will require close coordination between hiring managers, the HR office, and resource management staffs across offices to manage hiring this year and future years within the total FTE allotment. This may include term hires and managing attrition in both the IRA and regular budget such that, as IRA FTE and payroll are utilized, there is a plan to pay for FTE once IRA funds run out. If actual IRA pay needs are greater than the amounts estimated, offices must be prepared to shift IRA non-pay into IRA pay, abiding by all administrative

ceilings, to cover shortfalls. OCFO will review and discuss IRA FTE utilization and plans with offices as part of regular monthly planned payroll and FTE calls. Offices should use the payroll dashboard after each pay period posts to check on utilization and adjust if needed.

RPIOs are expected to manage FTE consistent with existing budgets within the same Fund, Program Area, Program Project, RPIO Activity Code with attention to payroll allocations as well as the Human Capital Plan and local payroll knowledge. RPIOs are responsible for preventing and remedying payroll defactors if exceeding their FTE ceiling or base pay from available non-payroll within the same Fund, Program Area, Program Project, RPIO Activity Code Please be aware relocation costs, liability insurance reimbursements, royalty payments, interest penalty payments, professional credentials, student loan repayments, permanent change of station benefits, and benefits payments outside of out the base are not included in base pay. Each RPIO are to ensure there is budget available for pay when recruiting or onboarding new employees.

Payroll Dashboard

The [payroll dashboard](#) is a tool the Office of the Chief Financial Officer has updated to support offices in managing their IRA FTE and payroll. All resource management staff are strongly encouraged to routinely use the Payroll Dashboard to monitor IRA FTE and payroll utilization compared to budget authority. Resource management staff can also use CDW, BFS, and other OCFO reporting tools to manage payroll and FTE.

Monthly Payroll Reviews

OB will hold monthly meetings with each RPIO to jointly review payroll and FTE data. This will be facilitated through the payroll dashboard. OB will highlight any budget lines projected to exceed authority and ask offices for their plans to manage the situation, including how the RPIO will cover their projected pay deficits. We continue to appreciate the strong partnership between OCFO and the payroll community to identify concerns and resolve them timely and appropriately.

Payroll Cost Accounting (PCA) Work codes for the IRA

It is the responsibility of all National Program Managers and Responsible Planning Implementation Officers (RPIOs) using IRA funds to ensure that the allocations in Payroll Cost Allocation (PCA) work codes align with the work being performed as allowable under the law and that FTE ceilings specified in the IRA operating plan are strictly adhered to. It is the responsibility of all EPA employees who perform IRA work to accurately report their hours using these codes. For additional details on IRA PCA work code and payroll charging refer to the [PCA Work Code Guidance](#) provided on February 23, 2023. For general payroll / PCA inquiries, please refer to the [Payroll Account Management \(PAM\)](#) SharePoint site.

Please contact OCFO_OB_Payroll@epa.gov with any questions or requests related to IRA work codes.

Reporting Requirements

Although OMB has not finalized additional IRA tracking and reporting guidance, we anticipate that there will continue to be many Congressional, GAO, IG and other stakeholder information requests. We must closely track and monitor IRA funds to meet all the IRA statute and Anti-deficiency Act requirements and fulfill expected Congressional, OMB and public inquiries. To efficiently fulfill IRA reporting requirements the OB has established RPIO Activity codes to track the purpose of all IRA funds.

RPIOs must ensure that the purpose of IRA funds can always be tracked to the underlying appropriation in the law and document and be prepared to report on the purpose of all obligations. OCFO will work with OGC and OMS to update reporting requirements guidance when OMB updates IRA reporting and other related guidance. There will be continued scrutiny of the funds used and it will be essential for all to assure that all funds are correctly coded and tracked.

The Office of Budget Status of Funds Financial Dashboard is available to assist the community with reporting IRA resources. [Status of Funds Financial Dashboard](#).

Grants and Inter-Agency Agreements (IAs)

OGD is available to provide support to Agency offices as needed on IIA and IRA financial assistance agreement issues including development of new programs, competition design and Notice of Funding Opportunity development and review, reporting, special terms and conditions, and any other issues that materialize.

Performance Partnership Grants

Grants funded with IRA funding are not PPG eligible unless the funds were directly appropriated in the Categorical STAG account which is the threshold legal requirement for PPG eligibility. Please contact Jim Drummond or OGD for further questions.

Workforce Support and Working Capital Fund

Ensuring all programs budget adequate workforce support costs is a priority for the Office of Budget. There is a significant amount of new FTE added to implement the IRA. In data entry, programs were to ensure adequate working capital fund BOC 38 levels of at least \$10 K per headquarters lifetime FTE and \$6 K per regional lifetime FTE. RPIOs are responsible for reprogramming into WCF (BOC 38) from other **non-pay** BOCs (21, 36, 37, 41) if they are short.

The Office of Budget recommends that program offices establish separate WCF service agreements for IRA FTE to better track funds. Please contact Ryan Lun (919-541-4145 or Lun.Ryan@epa.gov) or Andrew Cardenas (202-564-0352 or Cardenas.Andrew@epa.gov) if you need assistance.

Reprogramming IRA Funds

All IRA funds were distributed and allocated in the FY 2022 the spend plan. Since the IRA statute did not contain any reprogramming authorization, IRA reprogrammings that cross Fund or RPIO Activity Codes **are not** allowed. IRA reprogrammings will not be processed in BFS as part of the Congressional Reprogramming Process.

Payroll

RPIOs may request approval to transfer payroll funds (BOC 10) to other RPIOs. Please submit a Payroll Reprogramming Request Form located in [Inflation Reduction Act Guidance SharePoint](#) to your Control Team Analyst if you plan to move payroll to another RPIO. The form is also required for NPMs distributing payroll from the 9R allowance holder.

RPIO are expected to carefully manage pay and FTE utilization. If actual IRA pay needs are greater than the amounts estimated, offices must be prepared to shift IRA non-pay into IRA pay, abiding by all administrative ceilings, to cover shortfalls.

Non-Payroll BOCs (21, 36, 37, 41)

RPIOs may reprogram across non-payroll BOCs for travel, expenses, contracts, and grants. RPIOs can reprogram non-pay to resolve IRA payroll defactos. Administrative ceilings must be adhered to for all reprogramming.

Working Capital Fund BOC 38

OB will provide oversight of reprogramming IRA funds out of the WCF BOC (38). RPIOs are required to submit a request to their OB Control Team analyst prior to reprogramming WCF funds out of BOC 38 or across RPIOs. The purpose of these request is so that OCFO can understand the rationale behind the reprogramming out of the WCF. The WCF reprogramming form can be found on the [Inflation Reduction Act Guidance SharePoint](#).

Crossing NPMs (PRC)

RPIOs must submit a supplemental reprogramming form to their OB control team analyst for approval, prior to processing supplemental appropriation reprogrammings that cross between NPM and Program Project codes. The reprogramming request requires close coordination between originating and receiving NPMs before submitting to OB control team. Supplemental Appropriation reprogramming forms can be found on the [Inflation Reduction Act Guidance SharePoint](#).

Defactos

Defactos occur when an RPIO obligates funds more than the budget authority in a specific Fund, Program Area, PRC, Program Project, Sub-Program Project, RPIO Activity Code, or BOC. Defactos are a serious issue, and the IRA establishes strict limits on funds available for salaries and other administrative expenses. The Agency may not reprogram in or out of amounts cited in IRA statutory text. Accordingly, OCFO will not have the ability to shift funds into program projects to assist offices with payroll shortfalls.

It is the responsibility of all National Program Managers (NPM) and RPIOs using IRA funds to ensure that the allocations in Payroll Cost Allocation (PCA) work codes align with the work being performed as allowable under the law and payroll available. If actual IRA pay needs are greater than the amounts estimated, offices must be prepared to shift IRA non-pay into IRA pay, abiding by all administrative ceilings, to cover shortfalls.

Offices are strongly encouraged to use the [Financial Dashboard](#) and the [Payroll Dashboard](#) to regularly monitor FTE and payroll after each pay period posts.

Evidence Act Inflation Reduction Act Guidance

The Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) provides a framework to promote a culture of evaluation, continuous learning, and decision making using the best available evidence. EPA intends to leverage this framework to empower and strengthen Program and Regional decision-making by advancing an evaluation culture through the rigorous use of evidence and evaluation as a routine part of the Agency's operations.

Programs and Regions receiving new or additional resources from the Inflation Reduction Act are asked to develop evidence-building plans, including:

1. Develop a logic model or theory of change,
2. Identify potential priority questions you need to answer to advance your program, and a plan to answer those questions, including the data you would need.
3. Consult with the Associate Chief Financial Officer and Agency Evaluation Officer.
Consultation can include the Chief Data Officer, and Statistical Official, as appropriate.

State Grants

To ensure the Agency can continue to track state grant spending properly and produce the Budget Information for States report, all IRA spending transactions **must** have a State Code identifier in the organization field.

Attachments:

- A. FY 2022 -IRA Appropriation (Fund) Codes and Treasury Symbols
- B. FY 2022 -IRA Allowance Holders
- C. FY 2022 -IRA RPIO Activity Codes by NPM

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