

02.22.2019

# Illinois Solar for All Project and Participant Eligibility.

**Definitions and Verification Processes for Approved Vendors** 

**DRAFT FOR COMMENTS** 



# **Contents**

4.1	. Eli	Eligibility Overview		
4.2	. Pr	oject and Participant Eligibility by Sub-program	3	
	4.2.1	Low-Income Distributed Generation	3	
	4.2.2	Low-income Community Solar	4	
	4.2.3	Non-Profit/Public Facilities	6	
4.3	. Pa	rticipant Data Collection Overview	8	
4.4	. In	come Definition	8	
4.5	. In	come Included in Verification	9	
4.6	. In	come Not Included in Verification	9	
4.7	. Pr	operty Ownership Verification	. 10	
4.8	. In	come Verification	. 10	
	4.8.1	Method A: Third-Party Qualifying Program Verification	. 11	
	4.8.2	. Method B: Credit Bureau Verification	. 13	
	4.8.3	Method C: Tax Returns or Pay Stubs	. 13	
	4.8.4	Method D: Housing and Urban Development (HUD) Qualified Census  Tracts	. 14	
	4.8.5	Income Verification for Multiple Adult Households	. 14	
4.9	. Ve	rification Process Overview	. 15	
	4.9.1	Low-income Distributed Generation	. 15	
	4.9.2	Low-income Community Solar	. 17	
	4.9.3	Non-profit / Public Facilities Sub-program	. 19	
4.1	0. Da	ta Management and Validation	. 22	
4.1		w-income Community Solar Subscribers, Shares, and Annual Subscriber	22	



# **Eligibility Overview**

Eligibility for Illinois Solar for All varies by sub-program, with specific eligibility requirements for participants and project types. This section focuses on defining eligibility and prescribed methods for verifying that eligibility. For example, Low-Income Distributed Generation sub-program participants qualify based on household income. Low-Income Community Solar sub-program participants qualify based on household income or by residing in Housing and Urban Development (HUD) Qualified Census Tracts (QCTs). Non-profit/Public Facilities sub-program participants qualify by property location, as well as by the type of entity or by their ability to demonstrate community engagement.

These differences require that each sub-program have distinct eligibility descriptions and verification processes. These guidelines will provide sub-program-specific details for project and participant eligibility requirements and the prescribed methods for collecting and verifying eligibility data. It is the responsibility of the Approved Vendor to ensure that these requirements are met and that prescribed processes are followed.

# Project and Participant Eligibility by Sub-program

# **Low-Income Distributed Generation**

## PROJECT ELIGIBILITY

- Low-income Distributed Generation systems are installed on-site on residential properties.
- Systems are installed behind a customer's meter or connected directly to the utility side of the meter and are used to offset the load of one or more qualifying residential households occupying that property.
- The value of energy produced by the installed system is realized by occupants through:
  - Net metering or avoided usage connected directly to individual customer meters;



- Bill credits indirectly as a subscriber to a community renewable generation project connected directly to the utility side of the meter; or
- Passed onto occupants indirectly through lowered rents, stabilized rents, or other benefits or services the value of which can be demonstrated by the property owner or manager, connected directly to the common meter of the building.
- All participants pay no upfront costs and any ongoing costs and fees are less than 50% of the value of the energy generated by the system. See Financial and Savings Requirements section of the Approved Endor Manual for specific calculations of savings.
- The project meets all consumer protection guidelines and other program requirements.

#### PARTICIPANT ELIGIBILITY

- For single-family homes, households must verify they are 80% or less of Area Median Income (AMI).
- For two- to four-unit buildings, at least two of the households must verify they are 80% or less of AMI.
- For five-unit and larger buildings, either 1) at least 50% of the tenants must verify they are 80% or less of AMI, 2) the property qualifies for either US Department of Housing and Urban Development (HUD) Project-Based Vouchers or Project-Based Rental Assistance, 3) the property meets the definition of Affordable Housing under the Illinois Affordable Housing Act, or 4) the property qualifies for Income Eligible Multifamily Energy Efficiency.
- See the Eligibility Verification section below for prescribed methods of verification.

# **Low-income Community Solar**

#### PROJECT ELIGIBILITY

- Low-income Community Solar sub-program projects are installed on rooftops or ground-mounted.
- Systems are connected directly to the utility side of the meter.
- The value of energy produced by the installed system is realized by occupants through bill credits indirectly as a subscriber to a community renewable generation project.



- All participants pay no upfront costs and ongoing costs and fees are not to exceed 50% of the value of their share of energy generated by the system.
   See the Financial and Savings Requirements section (Section 5.2) of the manual for specific calculations of savings.
- The project meets all consumer protection guidelines and other program requirements.

#### PARTICIPANT ELIGIBILITY

- No subscriber can have a share greater than 40%.
- A single anchor subscriber that is not a low-income household (as defined below) will be allowed. The anchor subscriber's share will receive the applicable Adjustable Block Program Renewable Energy Credit (REC) price, unless it is a non-profit organization or public facility, in which case the RECs associated with its subscription share will be paid at the ILSFA Low-Income Community Solar price. The anchor subscriber must be identified at the time of the Part 1 application.
- Other than the anchor subscriber, all subscribers must be low-income households (defined as residential households that verify as 80% or less of AMI) in order to receive REC payments for those subscription shares. Any unsubscribed shares or any shares subscribed by subscribers that are not low-income households (outside the single anchor subscription) will receive no REC payments.
- At least 50% of total energy produced, excluding the anchor subscriber's share (e.g., if the anchor subscriber's share is 30% of the project capacity, then at least 35% of total energy produced), must be allocated to low-income subscribers at the time of energization.
- Subject to the requirements above, any retail electricity customer in that utility's territory can subscribe to the remaining shares.



# **Non-Profit/Public Facilities**

#### PROJECT ELIGIBILITY

- Non-profit/Public Facilities sub-program projects are installed on-site on properties occupied by a qualified non-profit or public entity.
- Systems are installed behind a customer's meter and used primarily to offset a single customer's load of the qualified non-profit or public entity.
- The value of energy produced by the installed system is realized by occupants through net metering or avoided usage connected directly to individual customer meters.
- All participants see no upfront costs and ongoing costs and fees are not to exceed 50% of the value of their share of energy generated by the system.
- The project meets all consumer protection guidelines and other program requirements.

#### PARTICIPANT ELIGIBILITY

- Serves the energy loads of non-profit or public sector customers.
- Installed on facilities within ILSFA qualified low-income **or** environmental justice communities within the state of Illinois:
  - Environmental Justice communities are identified through a methodology that multiplies the average of exposures and environmental effects with average socioeconomic factors. The calculation identifies the top 25% of qualifying census blocks across the state. A map and address look up tool is available for every address in the state. An additional process is available for representatives of communities to apply to have their geographic area designated as Environmental Justice community even if the program's quantitative methodology did not so determine it.
  - Low-income communities are defined as census blocks having a majority (50% or greater) of households at 80% or less of AMI. A map and address look up tool is available for every address in the state for these communities.
- Demonstrate **one** of the following:
  - Having a sufficient connection to and input from the low-income or environmental justice community members the non-profit or public agency serves, by:



- Providing a narrative summary of efforts taken prior to the application to conduct community outreach and education about the proposed entity being served by this installation, or
- Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of the proposed entity being served by this installation.

#### or

- The energy customer or property owner is a qualified critical service provider defined as a non-profit or public sector entity that offers essential services to low-income or environmental justice communities, including:
  - Advocacy organizations
  - Affordable housing providers
  - After-school care providers
  - Childcare centers
  - Community centers
  - Community financial institutions (such as credit unions, non-profit lenders)
  - Disability service providers
  - Emergency service agencies (fire, police, Red Cross)
  - Family support agencies
  - Food pantries
  - Homeless shelters
  - Hospitals, health care facilities, and clinics
  - Housing services providers
  - Immigration services providers

- Job training and workforce development services
- Mental and behavioral health facilities
- Municipal administration offices
- Places of worship
- Rehabilitation providers
- Public schools
- Senior centers
- Social service agencies
   (including unemployment and social security offices)
- Transitional or supportive housing (including for teens and LGTBQ)
- Women's or children's shelters
- Youth centers

Other types of potential critical service providers not found on this list can be submitted to the Program Administrator for a case by case review.



# Participant Data Collection Overview

Illinois Solar for All requires that data for all program participants be collected and shared with the Program Administrator. This includes all property owners, single-family occupants, tenants of multifamily properties, all subscribers to community solar projects and all non-profit or public entities receiving benefits through ILSFA energized systems. A Basic Information Form is completed for each participant. This data will be used for validation of eligibility, as well as for measuring program performance, including program reporting and periodic participant satisfaction surveys. All participant data is captured through the vendor portal at <a href="www.Illinoissfa.com">www.Illinoissfa.com</a> as part of the project approval process during Part I of the project application. Subscriber data for Low-income Community Solar projects requires annual project data updates, where additional subscriber data will be submitted and qualified subscriber shares updated.

# **Income Definition**

The total income of all household members over the age of 18 based on the most recent IRS 1040 form. Income reported on the 1040 form includes:

- 1. Gross wages, salaries, commissions, sick pay, and tips
- 2. Taxable interest
- 3. Dividends
- 4. Taxable refunds, credits, or offsets of state and local income taxes.
- 5. Social Security (SSA) or Disability (SSI)
- 6. Veterans (VA) benefits
- 7. Unemployment benefits
- 8. Alimony (or separate payments) received
- 9. Business or self-employment income (or loss)
- 10. Taxable amount of pension, IRA and annuity payments
- 11. Lottery income
- 12. Rental real estate, royalties, partnerships, and S Corporations or trusts.
- 13. Farm income (or loss)



# Income Included in Verification

All members of the household who are over 18 years old and who reported earned income including:

**Temporarily absent family members.** The income of temporarily absent family members is included regardless of the amount the absent family member contributes to the household. For example, a construction worker employed at a temporary job in a different part of the state earns \$600 per week. She keeps \$200 per week for expenses and sends \$400 per week to her family. The entire amount (\$600 per week) is counted in the family's income.

Adult students living away from home. If the adult student is counted as a member of the household in determining the household size (to compare against the income limits), the first \$480 of the student's income must be counted in the family's income. Note, however, that the \$480 limit does not apply to a student who is the head of household or spouse (their full income must be counted).

# Income Not Included in Verification

Minors. Earned income of minors (age 18 and under) is not included.

Income of live-in aides. If a household included a paid live-in aide (whether paid by the family or social service program), the income of the live-in aide, regardless of the source, is not counted and that person is not counted toward the total number of household members. A related person cannot be considered a live-in aide without the review and approval of the Program Administrator.



Permanently absent family members. If a family member is permanently absent from the household (e.g., a spouse who is in a nursing home), the head of household has the choice of either counting that person as a member of the household and including income attributable to that person as household income or specifying that the person is no longer a member of the household. Note: A household consists of all people living in one housing unit and all income of each adult household members must be documented and counted toward the household income.

# Property Ownership Verification

For Low-income Distributed Generation and Non-profit/Public Facilities projects, property owners contract directly with the Approved Vendor or their agents or subcontractors for the installed solar. Property ownership must be verified by obtaining a copy of the current mortgage or property tax statement. Income is verified for occupants, as applicable, whether property owners or tenants.

# **Income Verification**

To reduce the burden on program participants and the Program Administrator, and to mitigate the risk of storing sensitive personal information, a tiered approach is used for participant income verification for Low-income Distributed Generation and Low-income Community Solar projects. The Non-profit/Public Facilities sub-program does not qualify participants based on income and requires a different approach to eligibility verification, detailed in a subsequent section of this document. The tiered approach ensures the least invasive methods are tried first, moving progressively through alternate methods until income eligibility is determined.

There are four methods of income verification allowed for Low-income Distributed Generation and Low-income Community Solar sub-program projects that differ depending on sub-program. It is the responsibility of participants to certify their eligibility and of the Approved Vendor to verify eligibility. The Approved Vendor will follow the tiered methods of income verification



appropriate for each sub-program. The Approved Vendor will provide the verification documentation required for each participant or qualified building according to the methods prescribed below. Regardless of the verification method or sub-program, the participant will first **certify** eligibility by confirming they currently meet household annual income eligibility. Once certified, the Approved Vendor will collect the prescribed documentation to **verify** the eligibility of the applicant. The Program Administrator will then **validate** the findings.

# Method A: Third-Party Qualifying Program Verification

There are a number of existing programs, including housing and energy assistance programs, in which income eligibility is equivalent to or stricter than that of ILSFA or where affordable housing is strictly defined, such as the Low-Income Home Energy Assistance Program (LIHEAP), the Illinois Housing Weatherization Assistance Program (IHWAP), the U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers or Project-Based Rental Assistance (for multifamily), income-eligible multifamily energy efficiency, or tax-subsidized multifamily programs. Customers who participate in these programs automatically qualify for ILSFA upon validation by the Program Administrator. The following table shows the currently qualifying third-party programs and the required documentation the Approved Vendor will collect for verification.

Qualifying Program	Supporting Documentation		Verification Level
Supplemental Nutrition Assistance Program (SNAP)	Illinois Department of Human Services	Award Letter from Illinois Department of Human Services	Individual
Low-Income Home Energy Assistance Program (LIHEAP)	Illinois Department of Commerce & Economic Opportunity	LIHEAP Award Letter from household's local Community Action Agency	Household



Illinois Housing Weatherization Assistance Program (IHWAP)	Illinois Department of Commerce & Economic Opportunity	IHWAP Award Letter from household's local Community Action Agency	Household
Medicare	MEDICAR HEALTH INSURANCE  JOHN LOMITH  EGG-TE-MC72  HOSPITAL (PART A) 32-47-3076  MEDICAL (PART A) 32-47-3076  MEDICAL (PART B) 32-47-3076	Benefit letter from the Social Security Administration or Current Red, White & Blue Card with a Medicare Number (NOT a Social Security Number and the letters should NOT include S, L, O, I, B or Z)	Individual
U.S. Department of Housing and Urban Development (HUD) Project- Based Vouchers	ON THE SAME OF THE	HUD Award Letter or current statement	Household
U.S. Department of Housing and Urban Development (HUD) Project- Based Rental Assistance	ON DEVEL OF WENT OF	HUD Award Letter or current statement	Household
Income-Eligible Multifamily Energy Efficiency Programs	Comæd  An Exelon Company  Ameren	Eligibility based on qualified census tracts where 50% or more households are 80% or below Area Median Income. Address Lookup Tool	All Building Tenants



Tax-Subsidized Multifamily Programs	National Housing Preservation Database  NATIONAL LOW INCOME HOUSING COALITION	Report, exported data, or screenshot of the National Housing Database subsidies for that building	All Building Tenants
Illinois Affordable Housing Act	HUD USER	FY 2019 Fair Market Rent Documentation System	Household

# **Method B: Credit Bureau Verification**

Experian has been selected to provide independent income verification of households. This method requires Approved Vendors to first have occupants certify that they are below the required income threshold per the defined percentages of AMI established for each Illinois county and for that household size. A PDF displaying qualified incomes by Illinois county and household size is made available via the Approved Vendor portal. Once the applicant has certified eligibility, the Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-T) for all household members age 18 and over and Send or Upload to Experian using secure fax,



email, or custom interface (Note: wet or e-signatures are acceptable.) Upon receipt, the household's previous year's income is provided to the Program Administrator within 24 to 48 hours. The Approved Vendor must destroy hard copies of completed 4506-T forms within one week of when applicant eligibility has been determined.

# **Method C: Tax Returns or Pay Stubs**

This method requires Approved Vendors to first have occupants certify that they are below the required income threshold per the defined percentages of AMI established for each Illinois county and for that household size. A PDF displaying qualified incomes by Illinois county and household size is made available via the Approved Vendor portal. For all household members age 18 and over, photo or



electronic copies of their previous year's income tax return documents or pay stubs from the previous two months may be submitted to the Approved Vendor for verification. Approved Vendor employees must be trained on proper handling and protection of these documents to maintain their confidentiality, and only trained employees may handle the documents (this policy also applies to handling of Form 4506-T, discussed above). The Approved Vendor will submit electronic copies to the Program Administrator for validation. Hard copies and electronic documents will be destroyed within one week of when eligibility has been determined.

# Method D: Housing and Urban Development (HUD) Qualified Census Tracts

Low-income Community Solar sub-program projects allow for an additional household eligibility verification method using HUD QCTs. The method for verifying a household's eligibility is done using an online tool created for this purpose by the Program Administrator. This tool will be made available via the Approved Vendor portal at <a href="https://www.lllinoissfa.com">www.lllinoissfa.com</a>. Approved Vendors will enter the address into the tool and a PASS/FAIL will be displayed. Eligibility is then validated by the Approved Vendor once data is entered into the portal for that household.

# **Income Verification for Multiple Adult Households**

For households with multiple adults requiring income verification, various methods of verification can be used, with some limitations. Households that qualify at the household or property level do not need to verify income individually (e.g., one) qualifying for Low-income Community Solar using 1) HUD QCTs, 2) LIHEAP or IHWAP, 3) HUD Project-Based Vouchers or Rental Assistance Vouchers, or 4) Tax-Subsidized Multifamily Programs. Where individuals must each verify, they must verify using the same or similar method (e.g., all adults in a household can verify using credit bureau, tax returns, or paystub methods, or all adults in a household can verify through third-party programs, but adults in the same household cannot verify across these methods.



# **Verification Process Overview**

The verification process differs for each sub-program. Low-income Distributed Generation and Low-income Community Solar sub-program projects require income certification by applicants, verification by the Approved Vendor, and validation by the Program Administrator. Because HUD QCTs are allowed for Low-income Community Solar sub-program projects, and that method is least invasive to applicants, it will be prioritized for that sub-program. For projects across all sub-programs, a prescribed order of verification methods is required to ensure that the least invasive method is used first. The sections below detail the processes for all sub-programs.

The contract between the Approved Vendor and the property owner is a separate process and the verification associated with that contract is different from income verification for the participants. Property owners are not required to live onsite.

## **Low-income Distributed Generation**

STEP 1: The Approved Vendor will collect a completed Participant Household Basic Information Form from every adult and Send/Upload to the Program Administrator. The Participant Household Basic Information Form will capture key contact information including legal name of home owner, complete address, number of people living in household, household income range, and third-party qualifying program (if applicable). This completed form, along with the verification documentation prescribed, will be sent electronically to the Program Administrator via the Approved Vendor portal.

Method A

**Third-Party Qualifying Program Verification** 

<u>STEP A1:</u> The applicant will certify that they are currently eligible based on annual household income requirements of 80% or less of Area Median Income using either the current <u>Illinois Solar for All Area Median Income worksheet</u> or the online Illinois Solar for All Area Median Income verification tool, and complete the Participant Household Basic Information Form.



**STEP A2:** The Approved Vendor will determine if the participant household or property is enrolled in any qualified program and has been qualified within the previous 12 months.

<u>STEP A3:</u> If yes, the Approved Vendor will collect the required documentation corresponding to the Third-Party Qualifying Program and Send/Upload the form to the Program Administrator. If the applicant is not enrolled in a Third-Party Qualifying Program or does not have Third-Party Qualifying Program documentation, the Approved Vendor will go to Method B: Credit Bureau Verification.

**STEP A4:** If Third-Party Qualifying Program documentation is presented, the Approved Vendor will obtain a photo-copy or scanned image and submit it to the Program Administrator electronically. The Program Administrator will review the documentation and an answer of ACCEPTED or UNACCEPTED will be returned to the Approved Vendor.

If the response is ACCEPTED, the Income Verification process is CONFIRMED and COMPLETED

If the response is UNACCEPTED, the Approved Vendor will go to Method B: Credit Bureau Verification.

Method B

## **Credit Bureau Verification**

**STEP B1:** The Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-T) for all household members age 18 and over and Send/Upload to the Credit Bureau using fax, email, or custom interface (Note: wet or e-signatures via secure e-mail link are acceptable).

**STEP B2:** Experian will provide verification data to the Program Administrator within 24 to 48 hours.

<u>STEP B3:</u> The Program Administrator will compare income level to 80% AMI threshold and return an ACCEPTED or UNACCEPTED response to Approved Vendor.

If the response is ACCEPTED, the Income Verification process is CONFIRMED and COMPLETED.

If the response is UNACCEPTED or if the information cannot be provided by the Credit Bureau, the Approved Vendor will move to Method C.



Method C

#### Tax Return or Paystub Verification

**STEP C1**: The Approved Vendor will collect the most recent income tax returns or most recent paystubs capturing two previous month's earnings for all household members age 18 and over.

**STEP C2**: The Approved Vendor will review income to determine eligibility and provide electronic documentation to the Program Administrator for validation.

<u>STEP C3:</u> The Program Administrator will compare income level to 80% AMI threshold and return an ACCEPTED or UNACCEPTED response to Approved Vendor.

If the response is ACCEPTED, the income verification process is CONFIRMED and COMPLETED.

If the response is UNACCEPTED, that individual or household cannot participate in the program.

All tax or pay documentation will be destroyed after applicant eligibility is determined.

# **Low-income Community Solar**

<u>STEP 1:</u> The Approved Vendor will collect a completed Participant Household Basic Information Form and Send/Upload it to the Program Administrator. This form will include a participant certification that they currently qualify based on income eligibility requirements of 80% or less Area Median Income for the household.

Method D

**Housing and Urban Development Qualified Census Tract** 

<u>STEP D1:</u> The Approved Vendor will enter the participant's household address into the <u>Illinois Solar for All HUD QCT online tool.</u>

If the response is ACCEPTED, the Income Verification process is CONFIRMED and COMPLETED.

If the response is UNACCEPTED, the Approved Vendor will move to Method A.



Method A

## **Third-Party Qualifying Program Verification**

**STEP A1:** The Approved Vendor will determine if the participant household or property is enrolled in any of the qualified programs and has been qualified within the previous 12 months.

<u>STEP A2:</u> If yes, the Approved Vendor will collect the required documentation corresponding to the Third-Party Qualifying Program and Send/Upload the form to the Program Administrator. If the applicant is not enrolled in a Third-Party Qualifying Program or does not have Third-Party Qualifying Program documentation, the Approved Vendor will go to Method B: Credit Bureau Verification.

<u>STEP A2:</u> If Third-Party Qualifying Program documentation is presented, the Approved Vendor will obtain a copy and submit it to the Program Administrator electronically. The Program Administrator will review the documentation and an answer of ACCEPTED or UNACCEPTED will be returned to the Approved Vendor within one week.

If the response is ACCEPTED, the Income Verification process is CONFIRMED and COMPLETED

If the response is UNACCEPTED, the Approved Vendor will go to Method B: Credit Bureau Verification.

Method B

**Credit Bureau Verification** 

<u>STEP B1:</u> The applicant will certify that they qualify based on AMI using either the current <u>Illinois Solar for All Area Median Income worksheet</u> or the online Illinois Solar for All Area Median Income verification tool and complete the Participant Household Basic Information Form.

If the participant household does meet income eligibility, proceed to Step B2.

If the participant household does not satisfy income eligibility, they cannot participate in the program.

**STEP B2:** The Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-T) for all household members age 18 and over and Send/Upload it to the Credit Bureau using fax, email, or custom interface (Note: wet or e-signatures via secure e-mail link are acceptable).



**STEP B3:** The Credit Bureau will provide verification data to the Program Administrator within 24 to 48 hours.

<u>STEP B4:</u> The Program Administrator will compare income level to 80% AMI threshold and return an ACCEPTED or UNACCEPTED response to the Approved Vendor.

If the response is ACCEPTED, the Income Verification process is CONFIRMED and COMPLETED.

If the response is UNACCEPTED or if the information cannot be provided by the Credit Bureau, the Approved Vendor will move to Method C.

Method C

Tax Return or Paystub Verification

**STEP C1**: The Approved Vendor will collect the most recent income tax return or most recent paystubs capturing two previous month's earnings for all household members age 18 and over.

**STEP C2**: The Approved Vendor will review income to determine eligibility and provide electronic documentation to the Program Administrator for validation.

<u>STEP C3:</u> The Program Administrator will compare income level to 80% AMI threshold and return an ACCEPTED or UNACCEPTED response to the Approved Vendor.

If the response is ACCEPTED, the Income Verification process is CONFIRMED and COMPLETED.

If the response is UNACCEPTED, they cannot participate in the program.

All tax or pay documentation will be destroyed after eligibility is determined.

# Non-profit / Public Facilities Sub-program

<u>STEP 1:</u> Approved Vendor will collect a completed Non-Profit/Public Facilities Basic Information Form and Send/Upload it to the Program Administrator electronically. The Non-Profit/Public Facilities Basic Information Form will capture key organizational and contact information including organization name and



whether the organization is a nonprofit or public facility, complete address, primary contact information, and certification of services.

## LOCATION VERIFICATION

The Non-Profit/Public Facilities sub-program eligibility criteria allows for two paths to qualify the property by location. The property must be in either a qualifying Illinois Solar for All Environmental Justice or low-income community.

<u>STEP A1:</u> Environmental Justice Community Verification: The Approved Vendor will enter the property address into the <u>Illinois Solar for All Environmental Justice</u> Community Mapping Tool.

If the response is QUALIFIED, the Location Verification has been COMPLETED and the Approved Vendor will move to step B: Organizational Eligibility.

If the response is NOT QUALIFIED, the Approved Vendor will move to Location Verification Step 2.

<u>STEP A2:</u> Low-income Community Verification: The Approved Vendor will enter the property address into the <u>Illinois Solar for All Low-income Community</u> Mapping Tool.

If the response is QUALIFIED, the Location Verification has been COMPLETED and the Approved Vendor will move to step B: Organizational Eligibility.

If the response is NOT QUALIFIED, the entity does not qualify for Illinois Solar for All.

#### ORGANIZATIONAL ELIGIBILITY

The Non-Profit/Public Facilities sub-program allows two paths for satisfying organizational eligibility criteria, including 1) satisfying the definition of Critical Service Provider or 2) demonstrating the required level of community engagement.

The Non-Profit/Public Facilities Basic Information Form includes a Critical Service Provider survey, as well as instructions for documenting community engagement. This form is completed according to the path selected.

**STEP B1**: The Approved Vendor will ensure the Non-Profit/Public Facilities Basic Information Form is completed, indicating the selected path for verification by



Organizational Eligibility, either 1) Critical Service Provider, or 2) Community Engagement.

If 1) Critical Service Provider is selected, proceed to Step B2. If 2) Community Engagement is selected, skip to B3.

<u>STEP B2</u>: Verification as a Critical Service Provider category includes certification of critical services, certification of communities served, and the submission of (1) IRS determination letter for 501(c)(3) tax status for non-profits or (2) government agency statistical classification for public agencies.

The Approved Vendor will submit the completed form to the Program Administrator electronically. The Program Administrator will review the submission and return a response of ACCEPTED or UNACCEPTED.

If the response is ACCEPTED, Verification has been CONFIRMED and COMPLETED.

If the response is UNACCEPTED, the Approved Vendor can pursue eligibility through the Community Engagement path.

<u>STEP B3</u>: The Approved Vendor will ensure the Non-Profit/Public Facilities Basic Information Form is completed, indicating the selected path for verification by Community Engagement. This selected path requires documentation that satisfies one of two categories of engagement. This engagement is intended to demonstrate the applicant institution's engagement with the environmental justice or low-income community being served by either. Documentation includes either:

- Providing a narrative summary of efforts taken prior to the application to conduct community outreach and education about the proposed entity being served by this installation, or
- 2. Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of the proposed entity being served by this installation.

The Approved Vendor will submit the completed form to the Approved Vendor via email, fax, or document upload. The Program Administrator will review the submission and return a response of ACCEPTED or UNACCEPTED.

If the response is ACCEPTED, Verification has been CONFIRMED and COMPLETED.

If the response is UNACCEPTED, the participant organization does not qualify for Illinois Solar for All.



# **Data Management and Validation**

Participant Household and Non-Profit/Public Facilities Basic Information Forms contain participant certification of eligibility for their respective sub-program. These forms are used by the Approved Vendor as documentation that verifies eligibility and is shared with the Program Administrator for validation. The form is submitted to the Program Administrator via the Approved Vendor portal during data entry for Part I project application. Data is collected and transferred for each program participant.

Data is validated per the processes indicated above, with individual application validation(s) of eligibility required in order to complete Part I project approval. For Low-income Distributed Generation projects, where multiple applicants must meet eligibility requirements, all applicants must be validated before Part I project approval can be completed. Once eligibility is determined for any applicant, the electronic and hardcopy documentation is destroyed by the Approved Vendor within one week of eligibility being determined.

# Low-income Community Solar Subscribers, Shares, and Annual Subscriber Verification

Low-income Community Solar sub-program projects require that a minimum of 50% of the total system size (excluding any share subscribed to by an anchor subscriber) be allocated to qualified low-income households at the time of energization. The share of Low-income Community Solar RECs paid for at the ILSFA Low-Income Community Solar REC price upon energization is determined by the total system share subscribed by qualified low-income households or a single anchor subscriber that is a Non-Profit/Public Facilities sub-program participant, as described in the project eligibility section above. An anchor subscriber that is a non-low-income residential household or a business would have its subscription share receive payment for RECs at the applicable Adjustable Block Program price.

One year after energization, Approved Vendors will submit annual reports for each Low-income Community Solar sub-program project (as detailed in the Annual Reports section of the Approved Vendor Manual). These reports will require data for all participants, including changes in share for existing subscribers and share data for new subscribers, along with eligibility verification data for all new subscribers as prescribed previously in this section.



Each participant's eligibility will be validated by the Program Administrator during annual reporting in the same way as during project approval at energization. The requirements that a minimum 50% system share (after excluding the anchor subscriber's share, if any) be allocated to qualified low-income households must be met at this time. The amount of incentive payment will be prorated, and contracts adjusted accordingly, based on the validated share determined by the Program Administrator after annual reporting. If the project fails to reach the 50% threshold, collateral will be drawn upon to claw back 100% of the allocated payment for that delivery year (i.e., roughly 1/15 of the total contract price).