



## Responses to Comments on Grassroots Education Funding January 23, 2019

A framework for Grassroots Education funding<sup>1</sup> was presented by the Illinois Power Agency through its Program Administrator, Elevate Energy, on December 18, 2018 with a request for comments due on January 7, 2019. Comments have been received and posted to the Illinois Solar for All (“ILSFA”) Program website ([www.illinoisfsfa.com](http://www.illinoisfsfa.com)). The following represents a summative response to comments and how those comments have been incorporated into the final framework for Grassroots Education funding.

A Request for Proposals for qualified organizations to develop grassroots education campaigns will incorporate the content of this revised and finalized framework. This RFP is anticipated to be released well in advance of program launch.

The content summarized here represent comments captured during the two stakeholder feedback sessions facilitated on December 18, 2018, as well as individual comments submitted to the Program Administrator during the commenting period. Comments have been summarized and categorized into the following topics:

1. Organization eligibility
2. Relationship of educating organizations to ILSFA Approved Vendors
3. Campaign audiences and topics
4. Campaign Methods and Metrics
5. Participant engagement
6. Contract terms

### 1. Organization eligibility

Comments captured at the live sessions and individually submitted tended to support the idea of broadening the criteria by which organizations are determined to be eligible for grassroots education funding. Specific concerns were shared about geographic requirements or requirements for organizations to be specifically within low-income or environmental justice communities. These expressed a desire to generally broaden the definition to include community organizations that qualify based on their ability to implement effective campaigns.

The exception was that of the Illinois Solar for All Working Group, whose collective comments stated a desire to generally make the eligibility requirements more restrictive and to meet the spirit of the legislation and the Plan by ensuring that the organizations conducting education are community-based and truly grassroots. Additional concern was expressed about the difficulty of defining eligibility for public agencies to conduct education and meet the spirit of the law.

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<sup>1</sup> Grassroots education for the Illinois Solar for All Program is required under Section 1-56(b)(3) of the Illinois Power Agency Act and is further described in Sections 8.8 and 8.15.4 of the Long-Term Renewable Resources Procurement Plan (“Plan”).

The Program Administrator and the Illinois Power Agency have approached these conflicting opinions in a way we feel addresses all the concerns to some extent and balances the spirit and letter of the law and Plan.

- First, the eligibility has been narrowed to allow only nonprofit organizations and not public agencies. There is a concern that 1) the definition of community-based organization as defined in Section 8.6.2 of the Plan does not fit easily with public agencies, and 2) public agencies may have an unfair advantage in securing funds compared to smaller, community-based organizations.
- The Program Administrator has simplified the requirement around legal status to be any nonprofit organization registered with the Illinois Secretary of State, except membership, trade, or political organizations. However, these organizations must be able to demonstrate that they 1) regularly provide services to low-income or environmental justice communities, 2) have a demonstrated ability to provide outreach, education, training, or program delivery for energy related programs or services, or 3) have a demonstrated ability to provide outreach, education, training, or program delivery to low-income property owners, workforce development stakeholders or other community organizations and ILSFA participants and stakeholders.
- Additional concerns were expressed that community-based organizations as defined in the Plan may face barriers to eligibility and to facilitating the proposal and contracting requirements. To address these concerns, the Program Administrator has adopted the recommendation of the ILSFA Working Group to allow community organizations that are otherwise qualified based on their proposals to use Fiscal Sponsors that are qualified Illinois nonprofits as described above to help meet the organizational and financial requirements, and to provide administrative capacity.
- Other concerns about (i) geographic diversity or restrictiveness, (ii) experience, and (iii) capacity or general flexibility will be addressed by facilitating an RFP process that balances efforts across a cohort of organizations and campaigns in a way that ensures a diversity of issues, geographies, and methods are selected from proposals and a potential focus on priority issues as needed at certain points in time. As such, RFPs for grassroots education will be issued periodically during the lifetime of the ILSFA Program, with emphasis or areas of focus potentially being prioritized based on current needs and prior efforts.

## **2. Relationship of educating organizations to ILSFA Approved Vendors**

Comments on this topic generally expressed an expectation that ILSFA selected grassroots educators and Approved Vendors would work together in some capacity. There was specific concern that some communities, even with heightened interest in ILSFA and a good solar-ready foundation, may not be able to participate because Approved Vendors would not be working in their communities.

However, concerns over the potential negative aspects of a relationship between an educator and vendors were shared by the Program Administrator and the Illinois Power Agency at the December 18th events, stating that education efforts funded with state funds cannot directly serve or benefit Approved Vendors and that campaigns should not directly be marketing or providing customers to specific vendors.

The Program Administrator and the Illinois Power Agency recognize that there is value in communities, educators, and Approved Vendors working together to ensure communities have barrier-free access to ILSFA benefits and opportunities. At the same time, fundamental “guardrails” must be in place to ensure

that the processes and working relationships are equitable, transparent and meet the letter and spirit of the law and Plan.

- Overall, educator organizations can work with Approved Vendors by the latter's participating in education events, sharing expertise, or even marketing directly to potential program participants. However, rules will be in place to ensure that every qualified ILSFA Approved Vendor has an equal opportunity to participate in these events, that program entry for participants be facilitated by the Program Administrator at these events, that educator organizations can at no time during implementation receive payments from Approved Vendors, and that the grassroots education process is generally fair and transparent.
- These rules will be presented in spirit within subsequent RFPs. They will be documented more specifically in Terms and Conditions for educators and vendors in requisite contracts, attestations, and documents associated with the program.
- This framework of building relationships with Approved Vendors across the program still requires an important role for the Program Administrator on several fronts. For example, the Administrator shall work so that isolated, rural, or under-represented communities across the state have access to Approved Vendors; that potential program participants have a clear pathway to enter the program if no Approved Vendor provides that assistance; that important information that facilitates these interactions and partnerships is made easily and publicly available; and that communities across the state have the best opportunity to take advantage of the benefits of ILSFA.

### **3. Campaign topics and audiences**

Generally, comments suggested support for the identified target audience/stakeholders and education topics presented. Comments suggested, however, that flexibility is important to allow educators to adapt to the evolving needs of the program and market. It was suggested by commenters that the Program Administrator should identify target audiences and education topics, and even prioritize them. However, educators should be allowed to propose alternatives based on the unique needs of their communities.

The Program Administrator and the Illinois Power Agency agree with these comments and will facilitate their incorporation in the following ways.

- The Program Administrator will propose and prioritize specific target audiences and education topics but allow educators to propose alternatives based on the unique needs of their communities.
- RFPs will be issued periodically as opposed to all at once at the beginning of the Program to allow campaigns to be shaped by current needs or previous learning.
- As such, RFPs may shift or prioritize specific audiences and topics over time. For example, the first round may put more emphasis on foundational issues, like solar basics, broad program requirements, and benefits of program entry.

### **4. Campaign methods and metrics**

There was less consistency or consensus on the topic of campaign methods and metrics. Some comments suggested that campaigns should sign-up participants and use that as a measurement of

success. Other suggested that more clarity be offered as to what metrics could be used as a baseline. Otherwise, there was general agreement that those metrics presented were a good basis for educators to build campaign plans and measurement.

- The Program Administrator and the Illinois Power Agency believe that providing a transparent means for potential participants to enter the program, particularly through these education events, is important. However, measuring success by metrics based on these “sign-ups” may present unnecessary pressure on participants.
- A transparent and simple Administrator-facilitated process for managing participant program entry will be developed, which will include a fair and rational method for helping participants select or be assigned to Approved Vendors.
- Metrics will be presented within subsequent RFPs to provide a basis for organizations to develop campaigns and measurement goals. However, RFP requirements will be flexible to allow for community led approaches and measurement.

## **5. Participant engagement**

Related to topics identified in the previous section, comments suggested the importance of ensuring a clear process for getting participants into the program, as well as providing support and information.

- As stated in response to other comments, this will be addressed by providing a clear and transparent method for supporting potential program participants in entering the program in diverse ways: for example, a toll-free number, a sign-up method on the website, and sign-up cards made available through educators and facilitated by the Program Administrator.

## **6. Contract terms**

Comments on the types and terms of contracts varied. Commenters were supportive of the idea of periodic windows for campaigns and encouraging collaborative proposals. Questions arose about the amount of funding that will be available to individual organizations or collaborative campaigns. Additionally, the ILSFA Working Group suggested the use of fiscal sponsors.

- Fiscal sponsorship as a method of qualifying partnerships has been adopted, as stated in a previous section.
- Collaborative partnerships on campaigns will be encouraged in the language of the RFP.
- The Program Administrator and the Illinois Power Agency propose an initial round of campaigns launching, ideally, prior to program launch, with an anticipated duration of six to nine months. Subsequent campaign periods may be longer. It is believed there is value in this initial campaign session to learn from the launch and the needs of the communities represented by these first campaigns and adapt subsequent campaigns accordingly.
- The proposed award amount for each campaign will be up to \$50,000 per campaign. Collaborative proposals funding the work of multiple qualified organizations may exceed this amount.