



Illinois Solar for All
A STATE PROGRAM

ILSFA Workforce Requirements Webinar

Minimum Equity Standard (MES) & ILSFA Job Training

Agenda

- CRGA Update to Workforce Training Requirement
- Minimum Equity Standard (MES)
 - MES Overview
 - Defining Equity Eligible Persons, Contractors, and Project Workforce
 - MES Combined Compliance and Year-End Report
 - MES Safe Harbor
 - Waiver Process
- ILSFA Job Training
 - Program Requirements
 - Defining Qualified Job Training Programs and Eligible Job Trainees
 - Data Collection
 - Waiver Process

CRGA Changes – 2 Options to Meet Workforce Training Requirement

Beginning in PY26-27, entities must choose which path to take to meet their workforce requirement:

1. Minimum Equity Standard (MES), or
2. Job Training requirement.

For entities that choose to meet the MES in the 2026-27 Program Year, at least 14% of the project workforce must be comprised of Equity Eligible Persons (EEPs).

Minimum Equity Standard (MES)

What is the Minimum Equity Standard (MES)?

Beginning in Program Year 2026-27, entities in ILSFA have the option of meeting the Minimum Equity Standard instead of the Job Training Requirement. For entities who choose to meet the MES, the project workforce* of each participating Approved Vendor must meet a required minimum percentage that includes Equity Eligible Persons (EEPs), with this required percentage increasing to 30% by 2030. Definitions of EEPs, the minimum workforce percentages, and key steps and dates for compliance, are provided in this presentation.

CRGA DEI Goals & the Equity Accountability System

Public Act 104-0458, known as the Clean and Reliable Grid Affordability Act, added language that amends workforce requirements for the Program by providing ILSFA Approved Vendors the option to either comply with the Minimum Equity Standard (MES) or the existing ILSFA job training requirements, starting in Program Year 2026-27.

- For entities that opt to meet the MES, Approved Vendors must ensure that their project workforce consists of a minimum percentage of Equity Eligible Person(s) (EEPs).
- For the 2026-27 Program Year the MES requirement is 14%, meaning that 14% of the workforce on projects developed for the Program must be made up of EEPs.
- The IPA Act explains that the minimum percentage must increase to ensure a statewide average of 30% by 2030.

Who are Equity Eligible Persons and Contractors?

The IPA Act defines EEPs as:

- Graduates or current or former participants in the Clean Jobs Workforce Network Program, Clean Energy Contractor Incubator Program, Illinois Climate Works Pre-apprentice Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the solar training pipeline and multicultural jobs program
- Persons who are graduates of or currently enrolled in the foster care system
- Persons who were formerly incarcerated
- Persons whose primary residence is in an Equity Investment Eligible Community

EEC: A business that is majority-owned by equity eligible persons, or a nonprofit or cooperative that is majority-governed by equity eligible persons or is a natural person that is an eligible person offering personal services as an independent contractor.

Equity Eligible Contractors (EECs) are required to meet the MES beginning Program Year 2026-27



What is the Project Workforce?

The Illinois-Based Project Workforce includes:

- Employees, contractors and their employees, and subcontractors and their employees.
- Job duties are directly required by or substantially related to the development, construction, and operation of a project that is participating in or intended to participate in Illinois Solar for All.
- Including both project installation workforce and workforce in administrative, sales, marketing, and technical roles where those workers' duties are performed in Illinois.

Only workers whose duties are physically performed in Illinois should be included in the “project workforce,” regardless of where they live. Individuals who do not physically work in Illinois do not count towards the project workforce. For example, if a worker is remote and physically working outside of Illinois, they do not count towards the project workforce, even if they are doing work on ILSFA projects.

Who should be included in my organization's total project workforce?

Make sure to include:

- Anyone from your company's payroll who contributed to an ILSFA project
- Employees of any non-registered subcontractors who worked on ILSFA projects
- Temporary or part-time workers
- Pre-construction work
- Administrative work related to ILSFA projects
- Remote workers who perform their duties physically in Illinois

DO NOT include:

- Employees who do not perform work duties in Illinois
 - Remote employees who perform their work duties fully remotely OUTSIDE of Illinois

Optional:

- Employees of any subcontractors whose contract is less than 5% of the REC Contract value for a project
 - These can be included on a voluntary basis, but then all contractors below the 5% of REC contract value threshold must be included

How is "Program Participation" Defined?

For the purposes of the MES, "participation" in the Program includes:

- Submitting projects to Illinois Solar for All
- Performing construction on any project intended on being submitted to Illinois Solar for All
- Conducting any sales or marketing activity for projects that have been or will be submitted to the Program
- Maintaining subscriptions for a Community Solar project that holds a Renewable Energy Credit (REC) contract (including projects approved prior to the passage of CEJA)
- Maintaining a project on a waitlist
- Otherwise conducting business on a project seeking or that holds a REC contract



MES Combined Compliance and Year-End Report Overview

MES Combined Compliance and Year-End Report Timeline and Deadlines

June 1, 2026
Start date of new Program
Year 2026-27

June 1, 2026
*MES Combined Compliance
and Year-End Report opens
for submissions*

May 31, 2026
Conclusion of
Program Year 2025-26

July 15, 2026
*MES Combined Compliance
and Year-End Report
submission deadline*

MES Combined Compliance and Year-End Report

The Combined Report has two sections

MES Year-
End Report

Looks backward and captures how an organization achieved the 14% MES requirement for the 2025-26 Program Year

MES
Compliance
Plan

Forward-looking and captures how an organization intends to achieve compliance with the 14% MES requirement in the upcoming 2026-27 Program Year.

As the MES requirements are new for ILSFA in the 2026-2027 Program Year, entities that choose to comply with the MES will not have a backward-looking portion of the MES Combined Compliance and Year-End Report in July 2026. The MES Combined Compliance and Year-End Report due in July 2027 will include both the forward and backward-looking portions of the Report.

MES Compliance Plan Overview - "Forward-Looking" Portion

All AVs that opt to meet the MES are required to submit an MES Compliance Plan for the new Program Year.

If an entity applies to be an AV during a delivery year and opts to meet the MES, Compliance Plans are required at time of initial application

The forward-looking portion of the report outlines the Approved Vendors plan to achieve the MES for the program year

- MES Compliance Plans explain how the AV plans to meet the 14% MES for all projects submitted to Illinois Solar for All in the 2026-27 Program Year.



MES Compliance Plan Overview - "Forward-Looking" Portion

The MES Compliance Plan is intended for participating organizations to commit to complying with the upcoming Program Year's MES requirement. Required data and information include:

- A narrative description of how the organization will ensure that at least 14% of its workforce will be EEPs
- Projected workforce total for the upcoming Program Year, including the projected number of EEPs currently in that workforce, and the number of EEPs the entity seeks to hire to achieve compliance.
- Anticipated outreach efforts the entity intends to use to connect with EEPs

Achieving compliance with the MES for Program Year 2026-27 means that at least 14% of an AV's Illinois-based project workforce is comprised of EEPs.

MES Year-End Report Overview - "Backward" Portion

As this is the first year that ILSFA AVs have the option to comply with MES, AVs will be asked for data for their projected 2026-27 project workforce. For the current 2025-26 Program Year, ILSFA AVs are not required to demonstrate compliance with the MES requirement.

In future MES Combined Compliance and Year-End Reports, participating AVs will be required to document their organization's compliance with the MES for the Program Year, including documentation on outreach efforts to recruit EEPs and the number of EEPs in its Illinois-based project workforce.



Year-End Report Overview - "Backward" Portion

The MES Year-End Report is intended for participating organizations to document compliance with the MES.

Required data and information include:



AV/Designee Information



Project workforce total



Project workforce demographic information



EEP workforce totals, including proof of EEP eligibility and any supporting documentation for EEPs not registered in the IPA's Energy Workforce Equity Portal



Outreach efforts employed to recruit EEPs



Job training program graduate hiring data, Illinois-based workforce diversity data



ZIP codes for all project workforce

MES Combined Compliance and Year-End Report Submission Process

The MES Combined Compliance and Year-End Report will be submitted via Smartsheet's.

ILSFA Approved Vendors will receive the link via email from the Program Administrator or may access the form in the [ILSFA Resource Library](#) under the Workforce Development tab.

- The submission window for MES Combined Compliance and Year-End Reports* will open on June 1, 2026; all Reports are due by July 15, 2026
- Please send any questions about your submission or the submission format to: Tonya.Johnson@elevatenp.org
- A template of questions in the MES Combined Compliance and Year-End Report can be found at [ILSFA Resource Library](#) under the Workforce Development tab.

*Submission of the backward-looking portion of the MES Combined Compliance and Year-End Report will not be required in July 2026. The MES Combined Compliance and Year-End Report due in July 2027 will include both sections.



MES Report Evaluation Process

MES Reports will be reviewed and assigned one of the following status determinations:

- Compliant – The entity has met the applicable MES requirement for their ILSFA workforce.
- Non-Compliant – The entity has either not met their MES requirement within their project workforce, did not submit their MES Report, did not submit an MES Waiver request, or was denied an MES Waiver.
- Waiver Granted – The entity submitted a request for an MES Waiver that was granted by the Agency.
- Need Info (Incomplete Submission) - The submission is incomplete. The entity is required to provide any missing supplemental documentation.

MES Equity Eligible Persons (EEP) Verification

EEP Verification

In the Year-End portion of the MES Combined Report, you will be required to provide the full names of individuals in your project workforce who qualify as EEPs

This can be done by either:

- Having EEPs register in IPA's Energy Workforce Equity Portal
- Collecting signed EEP attestations and providing documentation for those individuals' EEP qualifications to submit to the Program Administrator with the Year-End Report

The Program Administrator will verify EEP qualifications as part of the review process



Energy Workforce Equity Portal

CEJA directed IPA and the Illinois Department of Commerce and Economic Opportunity (“DCEO”) to help historically underserved communities participate in and benefit from the growing clean energy economy. On January 31, 2023, IPA announced Phase I launch of the Energy Workforce Equity Portal.

Job seekers can use the portal to:

- See if they qualify as an EEP
- Register as an EEP
- View clean energy job postings for EEPs

Clean Energy Companies can:


- Advertise clean energy jobs
- Search for EEPs seeking employment

While it is not a requirement to have EEPs registered in the Energy Workforce Equity Portal, this might provide an easier route to compliance with the MES.

After registering in the Energy Workforce Equity Portal and providing any necessary documentation, an EEP will receive an email from the IPA confirming their status within 5 business days

The screenshot shows the homepage of the Energy Workforce Equity Portal. At the top, there is a navigation bar with the Illinois state logo and the text "ILLINOIS .GOV". Below this is a search bar and a "Select Language" dropdown menu. A yellow banner contains the text: "If you are currently employed at a clean energy company and are looking to become certified as an Equity Eligible Person, click [here](#)." Below the banner, the main heading reads "Welcome to the Energy Workforce Equity Portal". There are two primary call-to-action buttons: "For Employers" and "For Job Seekers". Under "For Employers", the text says "CONNECT TO JOB SEEKERS, REGISTER AS A CLEAN ENERGY COMPANY, AND POST JOBS". Under "For Job Seekers", the text says "CONNECT TO EMPLOYERS, EXPLORE JOBS, AND APPLY TO BECOME EQUITY ELIGIBLE PERSONS". At the bottom of the page, a large green button displays the URL "ENERGYEQUITY.ILLINOIS.GOV".

Energy Workforce Equity Portal



Equity Eligible Persons

Job seekers and individuals who are employed at a clean energy company can qualify as an Equity Eligible Person (EEP) in four different ways*. Please fill out the information below to complete your application to be considered an Equity Eligible Person.

Contact Info

First Name *

Middle Initial

Last Name *

Telephone *

Email Address *

City *

→

Basis for Equity Eligible Person Status *

[Click here for Map of Equity Investment Eligible Communities.](#)

- Primary residence is in an Equity Investment Eligible Community (EIEC)*
- Formerly incarcerated
- Graduate or enrolled in Foster Care System
- Graduate, current or former participant in eligible job training/workforce development program

Are you NABCEP Certified? *

The North American Board of Certified Energy Practitioners offers a variety of certifications for renewable energy professionals. For more information see: [Web Site](#)

Yes No

Are you a Qualified Person? *

The standard to be considered a Qualified Person is contained in the Illinois Commerce Commission's Part 468 Rules for Distributed Generation Installer Certification.

See: [Web Site](#)

Yes No

Are you a member of a union? *

Yes No

→

Personal Info

This information will be kept confidential by the Agency but may be published on an aggregated basis.

Race/Ethnicity *

Select

Gender *

Select

Attachments

File Upload

Please attach the following documents:

1. Upload Proof of your EEP Status
2. Resume (if seeking employment as an EEP)

Drag and drop files here or [browse files](#)

Final Attestation that information provided is true and complete *

Do you want your information shared at this time? If 'Yes', your information will be shared with employers that use the Portal to recruit equity eligible job seekers. * If you would not like to have your information displayed to potential employers, please select 'No'

Select

Year-End Report Process – EEP Attestation and Supplemental

If your organization's EEPs are NOT registered in the Energy Workforce Equity Portal, your organization will be required to collect signed EEP attestations and to provide documentation for those individuals' EEP qualifications to submit to the Program Administrator via the Year-End Report submission form.

The EEP Attestation Form can be found here:

<https://energyequity.illinois.gov/content/dam/soi/en/web/energyequity/documents/eep-attestation-formv2.pdf>

Supplemental documentation is required for EEPs who qualify based on graduation from a participating workforce training program, or whose primary residence is located in an Equity Investment Eligible Community.

Acceptable documentation:

- For EEPs who qualify based on graduation or current participation in a qualifying workforce training program, please provide either an acceptance letter from the training provider (for current participants), or a certificate of completion from the training provider (for graduates).
- For EEPs who qualify based on primary residence, please provide the individual's driver's license or state ID, utility bill, pay stub, mortgage agreement, or lease for the Program Administrator to verify the individual's eligibility.

MES Safe Harbor & Waiver Process

Small Business Safe Harbor

Companies that meet the following criteria are eligible for IPA's Safe Harbor Approach if they can demonstrate a good faith effort to comply with the MES. These entities are considered compliant with the MES. The required Safe Harbor activities are outlined on the next slide. Please note, Safe Harbor will not apply to PY 25-26, as MES was not a requirement for that PY.

This approach applies to entities that:

- Have fewer than 8 employees, **and**
- Hired new staff during the relevant Program Year, **and**
- Did **not** hire an EEP and **do not** otherwise meet the MES by having an EEP on staff



Small Business Safe Harbor

- **To demonstrate a good faith effort to comply with the MES, entities must complete at least one activity in three of the five categories from the list below.**
- Utilize the Energy Workforce Equity Portal
- Engage in Local and Community-Based Recruitment Efforts
- Conduct Outreach to Specific Equity-Focused Groups
- Post Job Opportunities on State-Sponsored Platforms
- Collaborate with the Program Administrator

Entities are required to maintain records of their recruitment and outreach efforts. The documentation must be provided as part of the entity's MES Year-End Report. Failure to perform at least one activity in three of the five categories will result in a finding of non-compliance with the MES.

Further information can be found in section 15.12 of the AV Manual.

MES Waiver Overview



If, despite significant efforts, your organization determines it will not achieve the 14% MES goal, your organization is encouraged to request a waiver.

The Program Administrator will accept waiver requests on a rolling basis.

Waiver requests are evaluated against a scoring system and a minimum of 20 points is needed to grant a waiver.

MES Waiver Requirements

The Agency will grant waivers in rare circumstances where the applicant provides evidence of significant due diligence toward meeting the Minimum Equity Standards. Per the Long-Term Plan, waiver requests should include:

A brief narrative describing the entity's effort to recruit EEPs prior to the start of project development, including utilization of the Energy Equity Workforce Database developed by the Agency as well as the following:

- Working consistently and assertively with approved State job training and workforce development programs to recruit a diverse workforce and provide evidence of outreach.
- Maintaining applications of individuals not selected for an opening for contact regarding future project openings.
- Participating in job fairs and related local community events to recruit a diverse workforce.

Evidence of efforts to hire or contract with EEPs, such as communications with affiliated CBOs and/or training program facilities, State workforce hubs, union hall registers, professional development associations, etc. This should include the date of contact, the agency official and title of the individual contacted

MES Waiver Requirements Continued

- Efforts to proactively establish contracting relationships with EECs.
- Advertising or formal solicitation using various platforms of targeted social media. Engagement in direct and extensive outreach to appropriately-targeted associations or other relevant organizations to notify them of the project opportunity.
- Evidence that the entity posted all solicitations on appropriate State agency websites, include direct targeted e-mail alerts to appropriate respondents who have registered with State agencies to learn of opportunities.

An Approved Vendor can appeal any and all decisions made by the Program Administrator to the IPA. While the Program Administrator is an extension of the Agency and works in lockstep with the Agency, the Agency offers this route to Approved Vendors as a matter of course.

Appeals should be sent in writing to the IPA within 2 weeks of the determination being appealed.

Consequences of Non-Compliance

Non-Compliance & Enforcement of Standards

Types of non-compliance:

- Entity fails to submit the MES Combined Compliance and Year-End Report by the deadline
- Entity fails to meet the required MES percentage in a given Program Year, as evidenced in their Year-End Report
- Entity's Year-End Report receives a "fail" rating and its MES waiver request is denied
- Entity fails to adhere to its MES Corrective Action Plan

Non-compliance with the MES may lead to disciplinary consequences, including but not limited to:



ILSFA Job Training Overview

Requirements: Two Categories

- **Portfolio Requirement:** Percentage of hours worked by eligible job trainees annually
- **Percentage of Annual Projects Requirement:** Percentage of projects including an eligible job trainee (33%)



Portfolio Requirements

- Installations across an Approved Vendor's entire portfolio of ILSFA projects each year include a minimum percentage of work hours performed by eligible job trainees.
- This timeline for these increasing annual percentage requirements will start with the beginning of construction of the Approved Vendor's first project contracted under the Program.



Portfolio Requirements

TABLE 15.1. PORTFOLIO REQUIREMENTS

Approved Vendor Program Year	Cumulative Job Training Requirement
1	10% of all hours are performed by eligible job trainees
2	20% of all hours are performed by eligible job trainees
3 and beyond	33% of all hours are performed by eligible job trainees

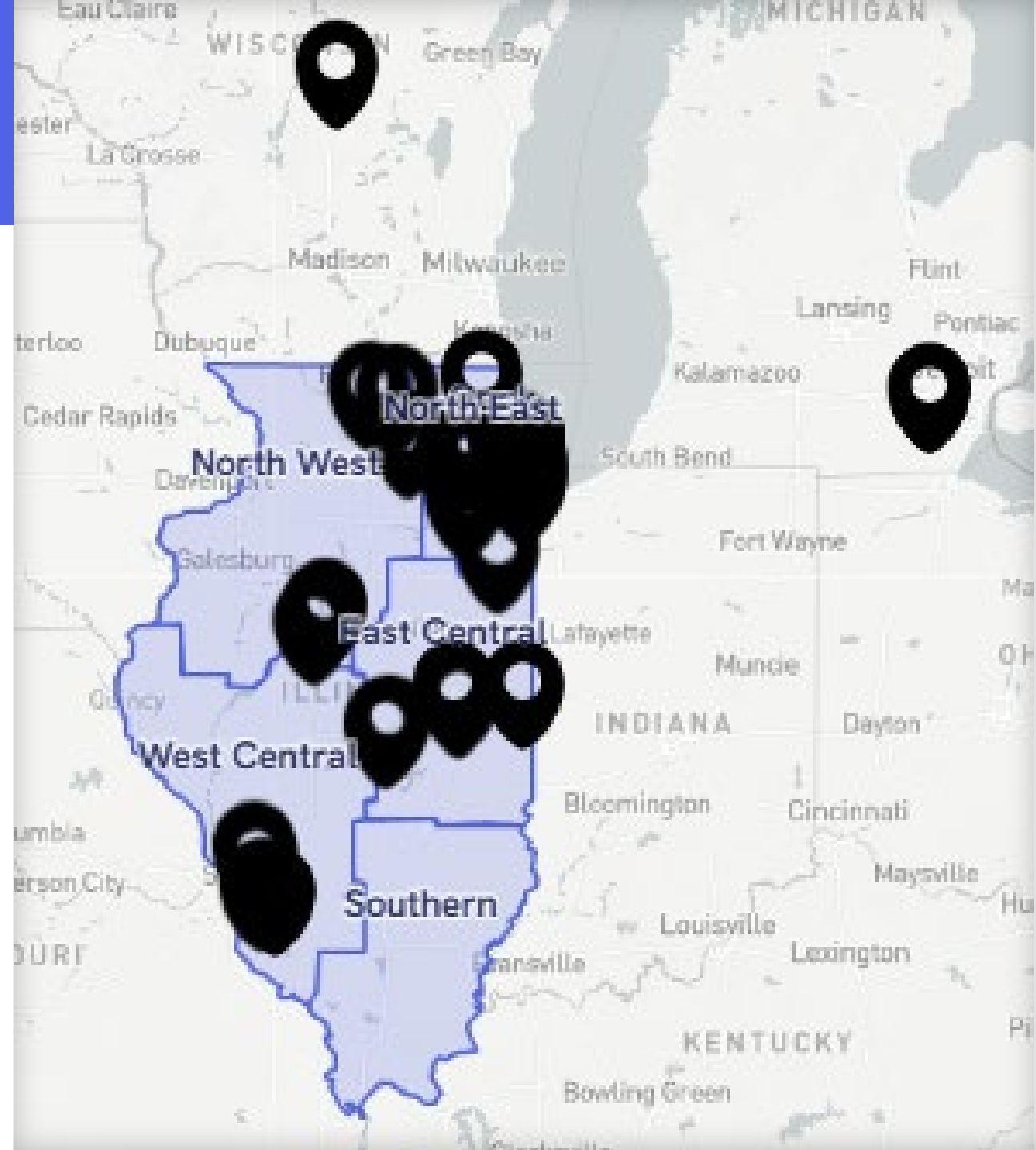
Percentage of Annual Projects Requirements

- 33% of all installations in each subprogram across an Approved Vendor's projects annually include at least one eligible job trainee.
- No minimum hours per project or cumulative total hours are prescribed for this requirement, only that a percentage of projects utilize at least one eligible job trainee.



Job Training: Qualified Job Training Programs

- To meet the ILSFA job training requirements, eligible job trainees need to come from: Qualified Job Training Programs - FEJA/CEJA Workforce Development Programs or Other Qualifying Programs.
- Directory of these programs can be found at <https://www.illinoissfa.com/job-training/>



Eligible Job Trainee

- Eligible job trainees are:
 - Individuals that have successfully completed a FEJA/CEJA Job Training Program
 - Individuals that have successfully completed an Other Qualifying Program (OQP) that results in a NABCEP PV Associate Credential
 - Individuals that have completed at least 50% of an OQP that would result in the eligible job trainee obtaining a Qualified Person status under IL Adm Code 468
- Eligible Job Trainees' hours are eligible to meet the job training requirements for up to five years after meeting the criteria to be an Eligible Job Trainee.
- Approved Vendors will be required to provide proof of program completion and date such as a certificate or email confirmation from the Qualified Job Training Program.

Data Collection in Part II

- The Eligible Job Trainee Affidavit document must be completed for each Eligible Job Trainee working on an ILSFA project and submitted in the portal.
- Demographic, geographic data, and hours worked on projects for all staff on an ILSFA project will also be collected in the portal.
- Prevailing Wage: Community Solar and Non-Profit and Public Facilities (except house of worship less than 100 kw AC)



Job Training Waiver Process

- Project Waivers can be submitted where good faith efforts have been made to meet job training requirements but were unsuccessful. Waivers will be assessed based on specific criteria. If a waiver is approved, the project waived will not be included in annual calculations and not counted towards annual goals – whether portfolio-wide requirements or percentage of annual project requirements.
- Approved Vendors are encouraged to bring compliance issues to the ILSFA team early in the development process. The Program Administrator will make every effort to provide resources, contacts, and guidance on locating and hiring Eligible Job Trainees. The Approved Vendor is expected to proactively seek help early.
- Please see <https://www.illinoissfa.com/resource-library/> for the Project Waiver Evaluation Rubric for guidance under the Workforce Development tab.
- AVs should use the Rubric as a guide to review what recruiting strategies show good faith effort and how the waiver is scored. Documentation is expected to be submitted with the waiver.

Thank you!

Email:

Joanna.Racho@elevatenp.org

