Illinois Solar for All
A STATE PROGRAM

Minimum Equity Standards FAQs

General

What is the Minimum Equity Standard?

Section 1-75(c-10) of the Illinois Power Agency Act ("IPA Act") required that the Illinois Power Agency ("IPA" or "Agency") establish an Equity Accountability System, which includes a Minimum Equity Standard ("MES") for the project workforce of entities applying for renewable energy credit ("REC") contracts. The Clean and Reliable Grid Affordability Act (CRGA) (P.A. 104-0458) introduced the MES to the Illinois Solar for All Program ("ILSFA" or "Program") providing entities with the option of meeting their workforce requirement by either complying with the traditional ILSFA Job Training requirements or the MES. The MES requires a certain percentage of an Approved Vendor's workforce to be Equity Eligible Persons. The purpose of the MES is to ensure increasing access to employment in the Illinois clean energy sector for those who historically have been excluded from such opportunities. The reporting mechanism to be used to assess understanding of compliance requirements and project workforce demographics is the ***MES Combined Compliance and Year-End Report***.

When was the first year that ILSFA Program participants who elect to comply with Minimum Equity Standard (as opposed to Job Training Requirements) were required to comply with the Minimum Equity Standard?

The Minimum Equity Standard took effect in the 2026-2027 Program Year that began on June 1, 2026.

Does a company that registers as an Approved Vendor mid-way during the Program Year need to meet the Minimum Equity Standard?

If an entity applies to be an Approved Vendor during a Program Year and chooses to meet their workforce requirement by complying with MES, the Agency will require an MES Compliance Plan at the time of their initial application to the Program. The newly approved Approved Vendor will be required to meet the MES within their workforce for that Program Year and show compliance through the MES Combined Compliance and Year-End Report after the close of the Program Year.

Where can I find the Minimum Equity Standard submission forms? Is there a template that I can review prior to submission?

The Minimum Equity Standard ("MES") Combined Compliance and Year-End Report is available here: Resource Library - Illinois Solar for All under "Workforce Development". MES reporting is submitted via Smartsheet's, but templates are available to review prior to the deadline.

Will Minimum Equity Standard reports be posted publicly? How is this information protected?

Individual plans will not be posted publicly. Minimum Equity Standard ("MES") Combined Compliance and Year-End Reports, Mid-Year Reports, and any other reporting of data will not be made public as a matter of course. However, they may be subject to the Illinois Freedom of Information Act ("FOIA"). The Agency will release aggregated data from MES reports tracking achievement of the MES across the market but will not identify any individual entities. The Agency will provide confidential treatment to MES reports in accordance with the provisions of Section 17 of the 2026-2027 Approved Vendor Manual.

What is the review process for the Minimum Equity Standard Combined Compliance and Year-End Report? Will submitters be able to correct or alter Reports after they are reviewed?

The review process for the Minimum Equity Standard ("MES") Combined Compliance and Year-End Report is described in Section 15 of the 2026-2027 Approved Vendor Manual and Section 10.1.5.1 of the 2026 Long-Term Plan. The Combined Report has two sections:

The forward-looking portion of the report, the Compliance Plan, will demonstrate how the Approved Vendor plans to achieve compliance with the MES percentage for work completed in the upcoming Program Year, and must include the following items:

1. A statement of intent to comply with equity accountability standards for the applicable Program Year and hire a diverse project workforce including Equity Eligible Persons and Equity Eligible Contractors. This will include a narrative description of how the applicant will meet these commitments.
2. Projected number of workers and the demographic breakdown by race, gender, and participation in job training or workforce development programs, or other means of compliance with the standard for EEPs
3. Plans for the use of Equity Eligible Contractors, if applicable
4. Company classification (i.e., Minority-owned, Woman-owned, Disabled-owned, Veteran-owned, Small Business, etc.), if applicable.
5. Communication plan for local outreach to increase the utilization of Equity Eligible Persons and Equity Eligible Contractors

What is the review process for the Minimum Equity Standard Combined Compliance and Year-End Report? Will submitters be able to correct or alter Reports after they are reviewed? *(continued)*

The backward-looking portion of the report, the MES Year-End Report, will confirm whether an entity met the MES requirement through data on project workforce, demographic data, and supporting documentation. Required information includes:

1. Approved Vendor information
2. Project workforce total for the Program Year
3. Project workforce demographic and geographic information
4. EEP workforce totals, including proof of EEP eligibility and any supporting documentation for any EEPs not registered in the IPA's Energy Workforce Equity Portal (e.g., for individuals that qualify based on residency in an Equity Investment Eligible Community, submission of proof of primary residence will be required)
5. Description of outreach efforts employed by the Approved Vendor to recruit EEPs
6. Job training program graduate hiring data, Illinois-based workforce diversity data, and other diversity and workforce data

Submitted MES Combined Compliance and Year-End Reports will be reviewed to confirm that all required information has been provided. Reports are reviewed to see if the submitter met the MES requirements for the given Program Year. If it is found that the Approved Vendor failed to meet MES requirements, the Approved Vendor may have an opportunity to revise and re-submit their Report or submit an MES Waiver.

What happens if an entity does not submit a Minimum Equity Standard Combined Compliance and Year-End Report?

An Approved Vendor that fails to submit a Minimum Equity Standard ("MES") Combined Compliance and Year-End Report 45 days after the end of the Program Year will receive communication from the Program Administrator explaining how to cure this violation. Entities that fail to cure or entirely fail to submit an MES Combined Compliance and Year-End Report may be subject to disciplinary action, which may include suspension from the Program.

Do I need to submit a Mid-Year Report?

Failure to submit a Mid-Year Report will not result in disciplinary action, but may negatively affect an organization's request for a waiver. The Mid-Year Report provides an opportunity to show progress toward meeting the Minimum Equity Standard ("MES"), and if an organization is struggling to meet MES requirements, the Program Administrator will reach out to share additional resources and guidance.

Is there a public list of EEC-certified Approved Vendors?

Yes, this information can be found on the Energy Workforce Equity Portal.

Do job postings for the hiring of Equity Eligible Persons require specific verbiage indicating a company's participation in the Program?

There is no required verbiage that entities must use on job postings. However, entities are encouraged to utilize the IPA's Energy Workforce Equity Portal to connect with prospective Equity Eligible Persons employees.

Is there a minimum score required to achieve a waiver from compliance with the Minimum Equity Standard?

The threshold to qualify for a waiver from compliance with the Minimum Equity Standard is a score of 20 points or above (16 points for entities that do not use subcontractors). Information on the waiver contents and how to submit a waiver can be found at Resource Library - Illinois Solar for All under Workforce Development.

Identifying EEPs

What is an Equity Eligible Person and what does that have to do with solar energy?

An Equity Eligible Person ("EEP") is a person that "would most benefit from equitable investments by the State designed to combat discrimination," and CEJA provided four specific characteristics that would qualify a person as an EEP:

- Graduates or current or former participants in the Clean Jobs Workforce Network Program, Clean Energy Contractor Incubator Program, Illinois Climate Works Pre-apprenticeship Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the solar training pipeline and multicultural jobs program created by Future Energy Jobs Act
- 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 eligible investment community

CRGA introduced the MES to the Illinois Solar for All Program, providing entities with the option of meeting their workforce requirement by complying with the MES, (which requires employing a workforce that includes a minimum percentage of Equity Eligible Persons. Participating companies are required to employ workers that are members of communities that have historically been excluded from economic opportunities, and in this way accomplishes the legislative objective of ensuring an equitable and inclusive clean energy economy.

Illinois Solar for All
A STATE PROGRAM

What is an Equity Investment Eligible Community?

Equity Investment Eligible Community is defined by statute as is either an Environmental Justice Community as defined by Illinois Solar for All, or an R3 Program Community (Restore, Reinvest and Renew Program, designated by the Illinois Cannabis Regulation and Tax). For maps and address lookup tools for these two types of areas see the combined map on the Energy Workforce Equity Portal.

Is there a list of zip codes that qualify as Equity Investment Eligible Communities?

No, the Equity Investment Eligible Communities' ("EIEC") boundaries do not precisely align with zip code boundaries, as they are based upon other data. Full addresses can be searched for eligibility on the EIEC map. Employers are highly encouraged to ask employees to register through the Energy Workforce Equity Portal to simplify the process.

What happens if an Equity Eligible Person, who qualifies under the residency requirement, moves to a different address that does not qualify? Is there a certain amount of time that the Equity Eligible Person must live at the qualifying location?

An entity reporting on the makeup of its project workforce must be able to demonstrate that an Equity Eligible Person ("I") qualified based upon residency resided in the qualifying location when the employee was hired. This can be demonstrated by the date displayed on the supporting documents (a driver's license, state ID, utility bill, pay stub, lease, or mortgage agreement) or through registration by the EEP on the Energy Workforce Equity Portal. The Agency highly recommends that employers request their employees that qualify through residency to register through the Energy Workforce Equity Portal. The Agency will require an individual who qualifies as an EEP based upon residency to recertify every two years.

How are applications reviewed for those seeking Equity Eligible Person certification based on status as formerly incarcerated? Is there a time limit as to how long ago the person was incarcerated?

"Formerly Incarcerated" means any individual who (i) was sentenced to a term of imprisonment, not including juvenile detention, after the disposition of one or more misdemeanor or felony charges; and (ii) has completed their sentence. An individual seeking EEP status based on being formerly incarcerated must sign an attestation in order to be certified by the IPA. There is no time limit on how long ago the incarceration occurred. The Agency strongly encourages employers to ask all of their employees to register through the Energy Workforce Equity Portal if they have concerns about asking individual employees for sensitive information regarding formerly incarcerated status. View the EEP attestation.

To qualify as an Equity Eligible Person ("EEP") as a graduate of the foster care system, must the prospective EEP have been in foster care in Illinois to qualify? Does participation in the foster care system as foster parents count towards EEP certification?

A "graduate or enrollee" of the foster care system means an individual who is currently or was formerly a youth in care of the Illinois Department of Children and Family Services, or the equivalent agency in another state. In other words, the definition includes those who have been in foster care outside of Illinois. Please note that individuals who act as foster parents do not qualify under this criterion.

Do all Equity Eligible Persons need to be registered on the Energy Workforce Equity Portal?

Equity Eligible Persons ("EEPs") are highly encouraged to seek certification through the Energy Workforce Equity Portal. Approved Vendors submitting their MES Compliance and Year-End Report will need to provide EEP verifications with their Report. EEPs are able to register through the Energy Workforce Equity Portal without having to reveal sensitive information to employers. If an EEP does not have access to the internet or is otherwise unable to register themselves in the Equity Portal, they can contact the Program Administrator or their employer for assistance.

How will employers verify Equity Eligible Persons if the employee chooses not to register on the Energy Workforce Equity Portal?

Registering on the Energy Workforce Equity Portal allows employees to be certified by the IPA as Equity Eligible Persons ("EEPs") without disclosing sensitive information directly to their employer. Employees who do not want to register on the Equity Portal can be registered via EEP Attestation. Employers are responsible for ensuring that EEP Attestations and supporting documentation are properly submitted to the Program Administrator in MES Combined Compliance and Year-End Reports.

Where does the Equity Eligible Person data on the Energy Workforce Equity Portal come from?

The Equity Eligible Person (EEP) data on the Energy Workforce Equity Portal comes from submissions to register EEPs through this form (located on the Equity Portal). Other EEP data comes from MES reports where entities manually register EEPs on their workforce. There is no comprehensive listing of all Equity Eligible Persons ("EEPs") in the state, so the Agency is working with the Illinois Department of Commerce and Economic Opportunity ("DCEO"), other state agencies, and community organizations to conduct outreach to educate individuals and communities about the Equity Portal and assist qualifying EEPs in certifying their status as an EEP. The Agency is working to make sure as many people as possible have access to this database.

How can employers reach those participating in EEP-qualifying training programs?

A list of CEJA and FEJA workforce training programs that qualify individuals to become EEPs can be found on the Employers page of the Energy Workforce Equity Portal. Please note only the Solar Training Pipeline and the Multicultural Jobs Programs created and funded by Future Energy Jobs Act ("FEJA") qualify individuals as an EEP due to the requirements of the Climate and Equitable Jobs Act ("CEJA") (P.A. 102-0662).

I want to hire Equity Eligible Persons, but there are none listed in my area. Where can I find more resources for recruiting EEPs?

The list of CEJA and FEJA workforce training programs on the Energy Workforce Equity Portal outlines which regions of the state the training programs serve and the type of training programs and credentials offered. Approved Vendors seeking to hire EEPs should utilize the Equity Portal to locate their local CEJA and FEJA workforce training program. In addition, Approved Vendors seeking to hire EEPs should contact other local workforce training programs, community colleges, and community-based organizations that work with returning residents and residents of Equity Investment Eligible Communities in order to identify potential EEPs.

How do I enroll in one of the qualifying workforce training programs to become an Equity Eligible Person?

The "For Job Seekers" section of the Energy Workforce Equity Portal includes a list of CEJA and FEJA workforce training programs across Illinois that would qualify enrollees as EEPs. The list of CEJA and FEJA workforce training programs outlines which regions of the state the training programs serve and the type of training programs and credentials offered. Please contact those workforce training programs for more information on enrollment windows. For those interested in learning more about the variety of CEJA workforce training programs before enrolling, please contact an Energy Transition Navigator program to learn about the variety of program options and to be referred to a CEJA workforce program.

Identifying the Project Workforce

What is the definition of "project workforce" for the Minimum Equity Standard?

For the purposes of the Minimum Equity Standard ("MES"), "project workforce" includes: employees, contractors and their employees, and subcontractors and their employees, whose 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 the IPA-administered programs and procurements under Section 1-75(c) and 1-56(b)(2) of the IPA Act. This shall include both project installation workforce and workforce in administrative, sales, marketing, and technical roles where those workers' duties are performed in Illinois. For purposes of this definition, 'directly required by or substantially related to' shall be construed to be any direct employee of the Approved Vendor or any contractor and its employees whose contract exceeds 5% of the REC Contract value. Employees of contractors below that threshold may be counted on a voluntary basis, but if the Approved Vendor includes at least one such contractor whose contract is less than 5% of the REC Contract value, then all contractors below the threshold must be included.

Employees That Do and Do Not Count Toward the MES

Type of Worker	Should they be counted toward the project workforce for the MES?
Designees/Subcontractors	Yes, as only Approved Vendors need to meet either the MES or the job training requirements. All Designees and subcontractors must be included in the total project workforce.
Temporary or Part-Time Workers	Yes
Non-registered Subcontractors	Yes
Pre-Construction Work	Yes
Admin Work	Yes
One-Time Subcontractors (surveyors, consultants, etc.)	Yes
Remote employees who do not perform any work duties in Illinois (including any of the above)	No

What does "duties performed in Illinois" mean in terms of a project workforce location?

The Agency understands the primary policy objective of Section 1-75(c-10) of the IPA Act as advancing equity across Illinois by providing access to the Illinois clean energy economy for businesses and workers from Illinois communities that historically have been excluded. Therefore, the relevant location is where the work is physically performed as that is the location of the economic opportunity. Only workers whose duties are performed physically in Illinois are included in the IPA's "project workforce" definition for Minimum Equity Standard ("MES") compliance in Illinois Solar for All.

Do remote workers who work on Illinois Solar for All projects but are physically located outside of Illinois count toward the project workforce?

No, the relevant location is where the work is physically performed. If a worker is physically working outside of Illinois, they do not count towards the project workforce, even if they are doing work on Illinois Solar for All projects. However, if that worker comes into the state to perform their duties, they would count towards the project workforce.

If a company has employees that live and/or work outside of Illinois, do those employees count towards the project workforce? What if the employee is only physically in Illinois for a brief period of time?

Only workers whose duties are physically performed in Illinois are included in the IPA's "project workforce" definition for Illinois Solar for All, regardless of where they live.

All employees who work physically in Illinois for any amount of time are included in the IPA's "project workforce" definition.

Is the 5% REC contract value threshold based on the aggregate value of all REC contracts associated with a company, or is it based on the REC contracts associated with specific projects?

The 5% REC Contract value threshold for project workforce is project-specific. For example, if a subcontractor worked on eight projects, the percentage of REC Contract value would need to be determined for each of those projects.

Would a staffing agency that is subcontracted with a company be considered when applying the 5% contract exception?

The 5% contract exception applies uniformly to all subcontractors, regardless of whether they are hired through a staffing agency. This means that either all subcontractors with less than 5% of the REC Contract value are counted towards the project workforce, or none are.

Can a company choose which subcontractors with less than 5% of the REC Contract value to count towards its project workforce?

When determining its project workforce, companies may either count all subcontractors with less than 5% of the REC Contract value, or none at all. It is not permitted to choose to count some contractors under the threshold towards the project workforce and not others.

Can Equity Eligible Persons be hired at any time during the Program Year?

Equity Eligible Persons ("EEPs") can be hired at any time during the Program Year for compliance with the Minimum Equity Standard ("MES").

If there is any reason to believe that an entity is utilizing suspicious hiring practices, such as hiring EEPs for a limited amount of time solely in order to meet the MES, hiring an EEP but not assigning them hours, or otherwise attempting to subvert Program requirements, those cases will be promptly reviewed by the Agency and the Program Administrator and the entity may be subject to disciplinary action.

What if a company does not hire anyone during the entirety of the Program Year?

In the event that a company did not hire or do any contracting during the Program Year, it will have the opportunity to attest to this on its MES Combined Compliance and Year-End Report. If the attestation is verified as accurate, the company will be considered compliant with the MES.

How can a company attest that they have not hired new employees during the Program Year?

MES Combined Compliance and Year-End Report submitters will have the opportunity to attest that they did not hire during the Program Year in their report. The Program Administrator may request additional documentation and explanation of the circumstances verifying that your organization did not do any hiring or contracting activity during the Program Year.

How should an Approved Vendor with less than eight employees comply with the Minimum Equity Standard of 14%?

If an Approved Vendor's project workforce for a given Delivery Year/Program Year is less than eight people, they should aim to employ one Equity Eligible Person ("EEP") and provide a Compliance Plan that outlines how they will strive to recruit an EEP in the event that they hire during that year. If the company has not hired anyone during the Program Year, they will be able to submit an attestation stating so on the Minimum Equity Standard Year-End Report. If the company did hire and was unable to hire an EEP, the entity would be eligible for the Safe Harbor Approach for small businesses as outlined in Section 15.12 of the Approved Vendor Manual. Please reach out to the Program Administrator if there are questions about compliance and support/guidance will be provided.

Does the Minimum Equity Standard and compliance with it apply only to construction work?

The Minimum Equity Standard ("MES") is not limited to construction. Per Chapter 10 of the Long-Term Renewable Resources Procurement Plan, project workforce includes "employees, contractors and their employees, and subcontractors and their employees, whose job duties are directly required by or substantially related to the development, construction, and operation of a project … [including] administrative, sales, marketing, and technical roles where those workers' duties are performed in Illinois."

If an entity has projects participating in the Program, any employees performing duties in Illinois substantially related to those projects must count toward meeting the MES for that Program Year, even if construction will not occur that year. The MES applies to any work conducted in a given Program Year on projects that are participating in IPA programs.

Do temporary or part-time workers count towards the Minimum Equity Standard?

Yes, temporary and/or part-time employees or subcontractors performing work on Illinois Solar for All projects count toward the Minimum Equity Standard.

Do employees that only work a limited number of hours, such as contractors or part-time employees, count toward the Minimum Equity Standard?

The Minimum Equity Standard ("MES") is based upon the number of individuals, not number of hours worked. Part-time employees, one-time contractors, or other employees with limited number of hours count towards the MES as long as they fit within the definition of "project workforce", as referenced elsewhere in these FAQs.

What if an entity only works on siting and permitting work, then sells the project pre-construction?

Pre-construction work completed physically in Illinois, including siting and permitting, is included in the definition of project workforce and therefore counts toward the Minimum Equity Standard and should be reported on.

Do entities need to report on their contractor's or Designees' workforce(s)?

Approved Vendors that opt to meet the MES must include Designees and subcontractors in their project workforce. They will also be asked to list the companies that they worked with during the Program Year. Designees participating in Illinois Solar for All do not report on workforce requirements, so they are included in Approved Vendors' reports.

Entities Subject to Minimum Equity Standard ("MES") Requirements

Who is required to meet the Minimum Equity Standard?

All Approved Vendors have the option to either meet the MES or job training requirements. Approved Vendors that opt to meet the MES are required to comply with the MES. Vendors must meet the selected workforce requirements for the duration of the program year. Changes to the selected requirements can only be made at the start of a new program year and during Approved Vendor registration.

For the purpose of the Minimum Equity Standard, does an Approved Vendor have to work directly with Equity Eligible Contractors, or can the Approved Vendor's general contractor work with and contract with Equity Eligible Contractors?

To meet the Minimum Equity Standard ("MES"), Approved Vendors do not necessarily have to work directly with Equity Eligible Contractors ("EECs"); the requirement is that an Approved Vendor's workforce must meet the MES for a given Program Year, and that can be achieved with or without EECs. If an Approved Vendor works with EECs, they will be asked to list which EECs in their MES Combined Compliance and Year-End Report. EEC Approved Vendors and Approved Vendors that partner with EECs may count the EEPs employed by an EEC at 1.5 times in calculating MES compliance.

If an Approved Vendor is already qualified as an Equity Eligible Contractor, do they have to comply with the Minimum Equity Standard?

All Approved Vendors, including Equity Eligible Contractor (EEC) Approved Vendors (AVs), are required to meet the Minimum Equity Standard.

Are small businesses required to comply with the Minimum Equity Standard?

The IPA has clarified how the MES applies to a business with a total Illinois-based project workforce that is small enough such that the percentage calculation results in less than one person. The following table shows the workforce sizes at which hiring an EEP is required to comply with the MES. See Section 15.12 of the Approved Vendor Manual for more information.

Program Year	Proposed MES Percentage	Size of workforce at which the Small Business must employ at least one EEP to comply with the MES
PY 25-26	**14%**	8 or more employees
PY 26-27	**14%**	8 or more employees
PY 27-28	**18%**	6 or more employees
PY 28-29	**22%**	5 or more employees
PY 29-30	**26%**	4 or more employees
PY 30-31	**30%**	4 or more employees

Scope of Participation in Program or Procurement

How does the IPA calculate whether a Program participant has met the Minimum Equity Standard? Do only Equity Eligible Persons count towards the project workforce calculation, or can the Minimum Equity Standard requirements be met through engaging an Equity Eligible Contractor to account for the required proportion of Equity Eligible Persons in the project workforce?

There are two determinations necessary for calculating whether an entity has met the Minimum Equity Standard ("MES"): the size of the relevant project workforce (the denominator), and the number of Equity Eligible Persons ("EEPs") employed in that workforce (the numerator). The project workforce is defined in the "Identifying the Project Workforce" section above. Please see the example below for a company that has 100 employees, 15 of which are EEPs.

15 EEPs / 100 Employees = 15%

Once the number of individuals within the project workforce has been established, an entity can calculate the portion of its workforce which must be comprised of Equity Eligible Persons in order to meet the MES. The required percentage to meet the MES is outlined in the current version of the Long-Term Plan and ILSFA Approved Vendor Manual. An Approved Vendor may not meet the MES solely through contracting with an EEC that makes up the required percentage of the overall project workforce. Instead, the Approved Vendor must include the employees of that EEC in the denominator (described above) of the calculation.

The Agency will count EEPs employed by an EEC-certified contractor or subcontractor, including the EEP majority owner, 1.5 times in calculating compliance with the MES. In this way, an Approved Vendor will more easily meet the MES if they contract with an EEC. Additionally, the IPA has determined that an Approved Vendor that subcontracts with an EEC on a project and yet is unable to meet the MES will receive additional points towards a request to seek an MES waiver for the project.

How will per-project waiver requests work when the Minimum Equity Standard Compliance Plan is on a portfolio basis?

Compliance with the Minimum Equity Standard ("MES") is viewed across the totality of an entity's Illinois project workforce, both in terms of planning and reporting. Community solar waiver requests are required to be submitted on a per-project basis. Distributed Generation waivers may be submitted on a portfolio level basis, covering all applicable projects for a given Program Year. The Program Administrator and the Agency will consider any waiver granted in determining the relevant project workforce size and whether an entity has met the MES requirements.

How does the Minimum Equity Standard change over time?

The scheduled increases for the Minimum Equity Standard ("MES") can be found in the current, approved Long-Term Plan.

How does a company report on a project that isn't finished within the Program Year?

Program participants must submit the MES Combined Compliance and Year-End Report showing compliance in the last Program Year within 45 days following the end of the Program Year.

For projects where work spans several Program Years, participants should report on the work conducted in each year, regardless of if the project was completed during that time. For example, the employees that performed administrative work in Illinois on a project's Part I application submitted in the 2026-27 Program Year would be included in the project workforce for the 2026-27 Program Year. If the project installation for this same project did not occur until the subsequent Program Year, then the installation workforce would be included toward meeting the MES of the 2027-28 Program Year in which the project was installed.

Does any entity still need to comply with the Minimum Equity Standard if it will not participate in Illinois Solar for All that Program Year?

If an Approved Vendor has no activity during a Program Year, that may be indicated on the MES Combined Compliance and Year-End Report and compliance obligations will not apply.

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

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

Exceptions to Meeting the Minimum Equity Standard

If your workforce has less than eight people, meaning that the 2026-27 MES requirement of 14% would be less than one person, are you still required to meet the 14% requirement?

If an Approved Vendor's project workforce for a given Program Year is small enough such that the percentage calculation results in less than one person, they should aim to employ one Equity Eligible Person ("EEP") and provide a Compliance Plan that outlines how they will strive to recruit an EEP in the event that they hire during that year. If the company has not hired anyone during the Program Year, they will be able to submit an attestation stating so on the Minimum Equity Standard Year-End Report. Companies that meet certain criteria may be eligible for the Safe Harbor Approach. More information on this can be found Section 15.12 of the Approved Vendor Manual. The Program Administrator can provide support and guidance for questions regarding compliance.

How can a company attest that they have not hired new employees during the Program Year?

MES Year-End Report submitters will have the opportunity to attest that they did not hire during the Program Year in their report. The IPA may ask for more information on this attestation during the review process.

Reporting Requirements

If an Approved Vendor works with a Designee or other subcontractor, who is responsible for reporting the Designee or subcontractor's workforce for MES reporting?

Approved Vendors are responsible for MES reporting. If a Designee or other subcontractor is hired by the Approved Vendor, the Approved Vendor is responsible for reporting workforce information that includes employees of that Designee or subcontractor. All Approved Vendors may use Designees and/or subcontractors, but the Approved Vendor is always ultimately responsible for compliance with Program requirements, including by any entity acting on its behalf.

Project Workforce and Hiring

Do people who work on the Illinois Solar for All program, but do not physically work in Illinois, count towards the Illinois Solar for All project workforce?

Individuals who perform work within the physical boundaries of Illinois count towards the reporting entity's Illinois Solar for All project workforce, regardless of where they live. Individuals who do not physically work in Illinois do not count towards the project workforce.

How are remote employees who work outside of the state calculated in the workforce calculation?

Only individuals who perform work within the physical boundaries of Illinois count towards the reporting entity's Illinois Solar for All project workforce, regardless of where they live. Individuals who do not physically work in Illinois do not count towards the project workforce.

How is the project workforce defined for the entire year, given certain employees may be hired and/or leave employment during the year? Is reporting confined to the team that is currently employed at the end of the program year (regardless of who may have been employed as part of the team throughout the year?)

The project workforce includes anyone who has worked on Illinois Solar for All projects in a given year. Part-time and temporary employees should be included. If they leave your organization during the Program Year, they should still be included in MES project workforce calculations.

EEP Criteria, Energy Workforce Equity Portal Registration, and EEP Attestations

Does the Energy Workforce Equity Portal provide a public list of registered Equity Eligible Persons (EEPs)?

The EEP list (EEPs who consent to having their information shown) is only visible to clean energy companies registered through the Equity Portal. To register as a clean energy company, please complete the online form.

If an EEP previously registered in the Energy Workforce Equity Portal, do they need to register again for the upcoming MES Year-End Report submission period?

If the EEP qualified based on foster care, prior incarceration, or workforce training program criteria, they will never need to register again. If the EEP qualified under the "residence in an EIEC" criteria, they are required to re-register in the Energy Workforce Equity Portal every two years.

Does graduation from the Craft Apprenticeship Program qualify individuals for EEP status?

No, the Craft Apprenticeship Program is not one of the EEP-qualifying programs. Please find the qualifying programs at: Energy Equity Portal.

Can a submitter use an EEP's signed documents from a previous Program Year's report?

EEP attestations from previous Program Years may be used if the EEP qualified based on foster care, prior incarceration, or workforce training program criteria, or if the EEP qualified on the basis of residing in an EIEC and their attestation is less than two years old. If the individual qualified as an EEP on the basis of residing in an EIEC and two or more years have passed, the individual must be re-certified. When completing new EEP attestations, companies are required to use the most updated template.

What if EEPs do not want to provide information on their EEP status to our Human Resources team?

EEPs who do not wish to report information to your company can register as an EEP through the Energy Workforce Equity Portal, and their qualification status will not be seen by the employer. One of the benefits of allowing individuals to register as EEPs through the Energy Workforce Equity Portal is that their EEP qualification criteria (foster care, former incarceration, EIEC residency, or workforce training program enrollment) is kept private, as well as their demographic information. If an employer is concerned with asking about qualification criteria, an alternate route would be to include registering through the Equity Portal as a part of the onboarding process, and letting them know that as an employer, you will not be able to see how they qualified.

An EEP must be certified through the MES reporting process or the Equity Portal in order to be counted towards an organization's MES compliance percentage.

The EIEC map was updated in June of 2024. Are updates to be expected every year?

The EIEC map is made up of the EJC map and the R3 map, which are updated on 5-year and 4-year cycles, respectively. The Agency intends to conduct an update to the EJC map during Program Year 2026-27 to more accurately designate those communities. As a result, the EIEC map will also be updated at that time to reflect changes to the EJC map.

What are some innovative ways to ask an individual if they qualify as an EEP without being 'forward' and intrusive?

One of the benefits of allowing individuals to register as EEPs through the Energy Workforce Equity Portal is that their EEP qualification criteria (foster care, former incarceration, EIEC residency, or workforce training program enrollment) is kept private, as well as their demographic information. If an employer is concerned with asking about qualification criteria, an alternate route would be to include registering through the Equity Portal as a part of the onboarding process, and letting them know that, as an employer, you will not be able to see how they qualified. Register through the Equity Portal.

If an individual who qualified as an EEP via a method not related to their residence (that is, based on workforce training, foster care, or prior incarceration criteria), relocates outside of Illinois but periodically performs work within Illinois, do they still qualify for EEP status?

Yes, as they do work in Illinois on Illinois Solar for All projects.

For union contractors that obtain manpower through the union hiring hall, what if a hired employee does not wish to disclose if they qualify for EEP status to their employer?

We do not require disclosing information to the employer, which is one of the reasons the Energy Workforce Equity Portal was created. In order to be counted toward the MES compliance percentage, an EEP must be either certified on the Energy Workforce Equity Portal or through the inclusion of their EEP attestation and any related documentation with the reporting entity's MES Year-End Report. Access the Equity Workforce Equity Portal.

What if an individual does not want to register as an EEP in the Energy Workforce Equity Portal?

In order to be certified by the IPA as an EEP and count toward the MES, an individual must register either through the Year-End Report process or through the Equity Portal. For EEPs who do not want to register in the Equity Portal, the Approved Vendor can collect signed EEP attestations and documentation for each EEP to submit to the Program Administrator. Download the EEP attestation.

If the EIEC map updates and a neighborhood/community is no longer on the map, do individuals who qualified as EEPs on residence criteria remain certified as EEPs moving forward?

If an individual's EEP status is based on residence in an EIEC and their community is later removed from the map due to an update, their EEP status will not change immediately. Instead, their status will be reassessed at the time of recertification. For EEPs who qualified based on residence in an EIEC, this occurs two years after their initial certification. For EEPs who are majority-owners of EECs, EEP status will be reviewed at the time of their next EEC registration renewal.

If an EEP self-registers in the Energy Workforce Equity Portal, how would an Approved Vendor know to include them as an EEP in MES reporting?

The EEP would need to let the Approved Vendor know that they have registered as an EEP in the Energy Workforce Equity Portal. They do not need to disclose to their employer the criteria upon which they qualified as an EEP, but the Approved Vendor would need to be advised that the individual is an EEP so the individual's name can be included in the Year-End Report. When reviewing MES Combined Compliance and Year-End Reports, the Program Administrator will cross-reference the name with the Energy Workforce Equity Portal.

How can a union contractor comply if the electricians hired from the hall cannot be individually selected to meet the EEP requirements?

The Agency will work to provide union-specific hiring guidance through ongoing collaborations with Union representatives.

Do you have data on how many individuals in the Energy Workforce Equity Portal are currently employed?

The Agency does not currently have data on the employment status of individuals listed in the Equity Portal, nor is there an existing mechanism to collect this information. However, we recognize the value such data could provide in evaluating the effectiveness of the Equity Accountability System. As part of upcoming efforts, including the Racial Disparity & Availability Study, the Agency will explore opportunities to collaborate with other state agencies to better understand employment trends in the clean energy sector. We will also consider whether alternative data sources or partnerships could help address current information gaps. While these possibilities remain exploratory at this stage, we are committed to strengthening our equity-related data collection over time.

Safe Harbor Guidance

Is Safe Habor the same as the MES Waiver?

The Safe Harbor approach is a separate process than the MES waiver. More detailed guidance can be found in the ILSFA Approved Vendor Manual.

When it comes to the Safe Harbor Approach, does hiring refer to the whole company or just the Illinois Solar for All project workforce?

The Safe Harbor approach regards the Illinois Solar for All definition of project workforce. Only individuals who perform work within the physical boundaries of Illinois count towards the reporting entity's Illinois Solar for All project workforce, regardless of where they live. Individuals who do not physically work in Illinois do not count towards the project workforce.

Waiver Requests

Do MES Waivers only apply to entities of a certain size?

No, the waiver is available to all participants. More information can be found on the waiver.

Administrative

To which email address will the unique links for MES reporting be sent?

It will be sent to the primary email address we have on file for the AV. Please reach out to vendors@illinoissfa.com if you'd like to verify the contact you have on file.

When will the state's MES requirement reach 30%? Can we expect regular increases over that time?

The 30% EEP goal is to be in place by Program Year 2030-2031 as is required by law. Entities can expect regular increases until then, as outlined in the latest version of the IPA's Long-Term Plan.

Who can we contact for additional questions about MES reporting?

For additional questions, please contact the Program Administrator at vendors@illinoissfa.com.