**Illinois Energy Efficiency Stakeholder Advisory Group**

**Policy Manual Subcommittee**

**Interim Policy Resolution:**

**Single Family Income Qualified (IQ) Eligibility Verification Guidelines**

**Final (11/9/2022)**

**5/3/23 Meeting Edits – REDLINE**

**Policy Issue:**

Current Illinois policy provides multiple verification pathways for IQ multifamily programs but has not yet expanded eligibility pathways for IQ single family (SF) programs. The current IQ SF verification pathway of requiring proof of income documentation can be overly burdensome on both the customer and program administrator. Allowing multiple eligibility pathways assists program administrators in serving the single-family IQ sector more effectively by maximizing the time spent serving the customer.

**Background:**

* Ameren Illinois submitted a policy proposal as part of the SAG Policy Manual Version 3.0 update process, to establish a policy on single family IQ eligibility verification guidelines.
* At the September 21, 2022 Policy Manual Subcommittee meeting, Ameren Illinois requested interim resolution of this policy, to help address customer eligibility verification challenges in their single-family IQ EE programs.
* A Policy Manual Small Group meeting was held on October 13, 2022 to discuss and edit proposed policy language.
* At the October 19, 2022 Policy Manual Subcommittee meeting, participants reached consensus on an interim policy resolution, with the understanding there will be further refinement of policy language through the Policy Manual Subcommittee process, including identifying additional single family IQ eligibility pathways.

**Policy Resolution:** Many federal, state and/or local programs have income requirements comparable to or more stringent than the Illinois utilities’ income eligible efficiency programs’ income qualification threshold of 80% of Area Median Income (and, for Ameren’s moderate income offerings, 300% of Federal Poverty Level). Because income verification for income qualified single-family homes can be challenging, expensive and time-consuming, and in order to ensure that such challenges, costs and or impositions do not adversely affect a customer’s ability to participate or an energy efficiency program administrators’ ability to serve income qualified single-family customers, there should be multiple pathways to establishing income eligibility for purposes of program participation and spend tracking.

This policy establishes pathways to identifying customers by their participation in other income eligible programs. Program administrators may verify eligibility using documentation submitted showing participation in an income eligible program. For example, the following pathways would be acceptable ways to demonstrate income eligibility for single family customer participation in program administrator income qualified single-family programs:

* Participation in a weatherization assistance program with like eligibility
* Participation in ratepayer-funded, utility shareholder-funded, federal, state, or locally-funded energy assistance programs with like income eligibility (e.g., Low Income Home Energy Assistance Program (LIHEAP), Percentage of Income Payment Plan (PIPP))
* Participation in other state, federal, or local income eligible programs with like income eligibility (e.g., Supplemental Nutrition Assistance Program (SNAP), Medicaid)
* For tenant-occupied single family and 2-unit homes, location in a Census Tract identified by the Program Administrator as low-income. As a starting point, the Program Administrator should use HUD’s annually published “Qualified Census Tracts.” HUD’s Low-Income Housing Tax Credit Qualified Census Tracts must have fifty percent (50%) of households with incomes below sixty percent (60%) of Area Median Income or areas that have a poverty rate of twenty-five percent (25%) or more. However, the Program Administrator’s target Census Tracts may be expanded or restricted based on additional analysis demonstrating that the change would ensure that the majority of homes treated would have at least fifty percent (50%) of tenants with incomes at or below eighty percent (80%) of Area Median Income. For example, a Program Administrator may choose to target a higher percentage of poverty within their definition of a low-income Census Tract.
* For non-IHWAP braided, single-family whole building retrofit projects, a self-certification process:
	+ Customers will answer these questions:
		- How many people live in your household?
		- What is the estimated combined yearly income for your household? This includes all members of the household aged 18 and above.
		- This information is used to verify income eligibility against the AMI criteria.
	+ Additionally, during retrofit service delivery, customers verify their eligibility by signing a customer authorization form.
* For non-comprehensive[[1]](#footnote-2) single-family programs, a self-certification process may also be used, including but not limited to:
	+ Customers will answer these questions:
		- How many people live in your household?
		- What is the estimated combined yearly income for your family? This includes all members of the household aged 18 and above.
		- This information is used to verify income eligibility against the AMI criteria.

In addition to the options above, Program Administrators may use other approaches that can demonstrably identify single family homes occupied by customers whose incomes are expected to be at or below 80% AMI (or, for Ameren’s moderate income offerings, at or below 300% Federal Poverty Level) in a manner less burdensome than by requiring income information. Program Administrators will inform stakeholders of any new qualification approaches and confirm no objections before beginning to use them. Program Administrators will employ the qualification methodologies that are the least burdensome and time-consuming for home owners and maximize the potential for and ease of participation in their Income Qualified single-family Programs.

Customers identified as eligible to participate in Income Qualified programs using a pathway established above should receive program benefits that align with the income eligibility requirements for the program pathway used to determine eligibility.

1. A “non-comprehensive” program example is the ComEd home energy assessment program. [↑](#footnote-ref-2)