**Solar for All**

**Income Verification Guidance**

The Renewable Portfolio Standard Expansion Amendment Act of 2016 (the Act), effective October 8, 2016, established the District of Columbia’s Solar for All Program (Solar for All). The Act intends to expand the District’s solar capacity, increase the amount of solar generated within the District, and provide the benefits of locally-generated solar energy to low-income households, small businesses, nonprofits, and seniors. Funded by the Renewable Energy Development Fund and administered by DOEE, Solar for All’s specific targets are to provide the benefits of solar energy to 100,000 low-income households (at or below 80% Area Median Income), and to reduce their energy bills by 50% (based on the 2016 residential rate class average usage) by 2032.

Per the Act, 80% of Area Median Income (AMI) is determined by the periodic calculation provided by the U.S. Department of Housing and Urban Development (HUD). The income limits for Solar for All will be based on the uncapped HUD 80% AMI determination and will be updated annually when HUD releases its annual Income Limits Summary. The new income levels will be effective as soon as they are published on HUD’s website: <https://www.huduser.gov/portal/datasets/il.html>

Grantees must verify income for Solar for All recipients through one of the four pathways below. All grantees must submit information on each household served to DOEE. This information will be used to generate a list of Solar for All participants in order to prevent multiple grantees from targeting the same households. A grantee is responsible for notifying potential Solar for All recipients who are determined to be ineligible.

There are four pathways for income verification depending on the type of Solar for All project and associated benefits provided:

1. Direct Solar Installation on Single Family Households (One-time Income Verification)
2. Solar for All Benefit for Households in Affordable Housing Properties (Triennial Income Verification)
3. Solar for All Benefit for Income-Qualified Households (Triennial Income Verification)
4. Indirect Solar for All Benefits (One-time Income Verification)

In addition to the four income verification pathways, this document lays out additional requirements the grantees must meet related to rental units and LIHEAP benefit disclosures.

1. **Income Verification Pathways**
2. **Pathway One: Direct Solar Installation for Single Family Households (One-time Income Verification Requirement)**

This income verification protocol is for Solar for All projects where direct solar installations occur on single family homes (with no Community Renewable Energy Facility (CREF) component). These households must be verified as income-qualified using this protocol prior to the installation of solar on the home. This is a one-time income verification requirement.

The grantee must collect potential recipient information on the Solar for All Program Application form and provide this information, the signed form, and supporting documentation to their Solar for All grant manager.

In addition to basic demographic information, the grantee must also indicate if the household meets one of the following categorical eligibility requirements. The District defines a household as categorically eligible for Solar for All if at least one person in the household receives assistance under one of the following programs:

1. Temporary Assistance for Needy Families (TANF);
2. Supplemental Nutrition Assistance Program (SNAP);
3. Supplemental Security Income (SSI);
4. the District’s Housing Choice Voucher Program; or
5. Low Income Home Energy Assistance Program (LIHEAP).
6. Residential Aid Discount Program (RAD)

If a household may be categorically eligible, the grantee must collect and upload supporting documentation to demonstrate that the household has met one or more of the categorical eligibility requirements above within the past year.

Households will also be considered categorically eligible if they have received confirmation of LIHEAP eligibility within the past year. For existing LIHEAP recipients, the grantee must still collect potential recipient information on the Solar for All Program Application form but does not need to submit supporting documentation; instead these households will be verified by DOEE internally.

Households that do not demonstrate categorical eligibility must complete the Low Income Home Energy Assistance Program (LIHEAP) online application. The grantee must indicate that they referred the household for income verification to DOEE when providing the household’s information to DOEE. To access the LIHEAP online application visit: [doee.dc.gov/liheap](file:///\\Ddoefile01\ddoe-energy%20office%20shared\Solar%20for%20All\RESEARCH\Income%20Verification\doee.dc.gov\liheap).

**Note:** If households are unable to complete the online application, DOEE may arrange an intake event in conjunction with the grantee.

1. **Pathway Two: Solar for All Benefit for Households in Affordable Housing Properties (Triennial Income Verification Requirement)**

This income verification protocol is for Solar for All projects that will serve an affordable housing property or units within an affordable housing property that are under an affordable housing covenant.

The grantee must demonstrate that the property will remain under an affordability covenant that aligns with the Solar for All Program income guidelines for the duration of the grantee’s solar benefit commitment period. This demonstration can be made by providing one or more of the following applicable documents and highlighting the relevant provisions that demonstrate that the income criteria listed above are satisfied:

1. Regulator Agreement (memorializes affordability restrictions between the owner and a District or federal agency);
2. Deed Restriction or Covenant;
3. Loan Agreement;
4. Affordable Housing Restriction (lists the number of restricted units, income to which they are restricted to, and terms of agreement);
5. Housing Assistance Payment (HAP) Contract (documents Section 8 provisions or local vouchers);
6. Tax Credit Regulatory Agreement and Declaration of Restrictive Covenants; and/or
7. Other relevant documentation not listed that has been reviewed and approved by DOEE.

In addition, the grantee must work with the owner or property manager to obtain the information required for the Solar for All Affordable Unit Information Request Form and provide this information to their Solar for All grant manager.

The grantee must also submit a notarized Affidavit Confirming Solar for All Affordable Unit Information.

Households receiving a Solar for All Program benefit must be recertified every three years. Households will be considered certified for a period of 42 months following the date of income verification.

Grantee is required to communicate to low-income household that they are legally obligated to report to Grantee and DOEE if their status changes and they become ineligible for Solar for All [i.e. income too high].

DOEE reserves the right to require Grantee to recertify households annually, a requirement the Grantee agreed to as DOEE award recipient.

1. **Pathway Three: Solar for All Benefit for Income-Qualified Households (Triennial Income Verification Requirement)**

This income verification protocol is for Solar for All projects that provide monetary or electricity credit benefits to assigned low-income households and cannot meet the requirements of Pathways One or Two. The participating households receiving a Solar for All Program benefit must be recertified every three years. Households will be considered certified for a period of 42 months following the date of income verification.

Grantee is required to communicate to low-income household that they are legally obligated to report to Grantee and DOEE if their status changes and they become ineligible for Solar for All [i.e. income too high].

DOEE reserves the right to require Grantee to recertify households annually, a requirement the Grantee agreed to as DOEE award recipient.

The grantee must collect potential recipient information on the Solar for All Program Application form and provide this information, the signed form, and supporting documentation to their Solar for All grant manager.

In addition to basic demographic information contained within the application form, the grantee must also indicate if the household meets one of the following categorical eligibility requirements. The District defines a household as categorically eligible for Solar for All if at least one person in that household receives assistance under one of the following programs:

1. Temporary Assistance for Needy Families (TANF);
2. Supplemental Nutrition Assistance Program (SNAP);
3. Supplemental Security Income (SSI); or
4. the District’s Housing Choice Voucher Program; or
5. Low Income Home Energy Assistance Program (LIHEAP).
6. Residential Aid Discount Program (RAD)

If a household may be categorically eligible, the grantee must collect and upload supporting documentation to demonstrate that the household has met one or more of the categorical eligibility requirements above within the past year.

Households will also be considered categorically eligible if they have received confirmation of LIHEAP eligibility within the past year. For existing LIHEAP recipients, the grantee must still collect potential recipient information on the Solar for All Program Application form but does not need to submit supporting documentation; instead these households will be verified internally.

Households that do not demonstrate categorical eligibility must complete the LIHEAP online application. The grantee must indicate that they referred the household for income verification to DOEE when providing the household’s information to DOEE. To access the LIHEAP online application visit: [doee.dc.gov/liheap](file:///\\Ddoefile01\ddoe-energy%20office%20shared\Solar%20for%20All\RESEARCH\Income%20Verification\doee.dc.gov\liheap).

**Note:** If households are unable to complete the online application, DOEE may arrange an intake event in conjunction with the grantee.

1. **Pathway Four: Indirect Solar for All Benefits (One Time Income Verification Requirement)**

This income verification protocol is for Solar for All projects that are installing solar on master metered properties and providing indirect or non-monetary benefits to income-qualified households. This pathway does not apply to Community Renewable Energy Facilities (CREFs).

All property owners participating in Solar for All under this income verification pathway shall report within 90 days to DOEE & grantee during the 15 year period if the property is no longer affordable housing.

For indirect benefits to the building in which the solar was installed, such as improved amenities like playgrounds and computer rooms in affordable housing properties, the grantee must document how the benefits will flow to income-eligible households over 15 years. The grantee must verify that the property receiving the capital improvement serves low income residents, one time up front. The grantee must also demonstrate how the savings will serve low-income residents. Finally, the grantee shall ensure the property owner agrees not to raise the rent of the participating Solar for All tenant units because of the solar energy installation, and the tenants are notified of this rent cap agreement.

For benefits going directly to assigned households such as scholarships, the participating household must be verified as income-qualified using this protocol prior to receiving such benefits. This is a one-time income verification requirement.

The grantee must collect potential recipient information on the Solar for All Program Application form and provide this information, the signed form, and supporting documentation to their Solar for All grant manager.

In addition to basic demographic information, the grantee must also indicate if the household meets one of the following categorical eligibility requirements. The District defines a household as categorically eligible for Solar for All if at least one person in the household receives assistance under one of the following programs:

1. Temporary Assistance for Needy Families (TANF);
2. Supplemental Nutrition Assistance Program (SNAP);
3. Supplemental Security Income (SSI);
4. the District’s Housing Choice Voucher Program; or
5. Low Income Home Energy Assistance Program (LIHEAP).
6. Residential Aid Discount Program (RAD)

If a household may be categorically eligible, the grantee must collect and upload supporting documentation to demonstrate that the household has met one or more of the categorical eligibility requirements above within the past year.

Households will also be considered categorically eligible if they have received confirmation of LIHEAP eligibility within the past year. For existing LIHEAP recipients, the grantee must still collect potential recipient information on the Solar for All Program Application form but does not need to submit supporting documentation; instead these households will be verified internally.

Households that do not demonstrate categorical eligibility must complete the Low Income Home Energy Assistance Program (LIHEAP) online application. The grantee must indicate that they referred the household for income verification to DOEE when providing the household’s information to DOEE. To access the LIHEAP online application visit: [doee.dc.gov/liheap](file:///\\Ddoefile01\ddoe-energy%20office%20shared\Solar%20for%20All\RESEARCH\Income%20Verification\doee.dc.gov\liheap).

**Note:** If households are unable to complete the online application, DOEE may arrange an intake event in conjunction with the grantee.

1. **Additional Requirements**

Additional requirements are listed below.

1. **Cancellation**: In all cases, grantees shall require participants in the Solar for All program to notify DOEE in the event they are no longer eligible to receive Solar for All benefits within 90 days. In addition, property owners that conducted capital improvements must provide written notification to DOEE within 90 days of the change in eligibility if the property ceases to qualify for Solar for All benefits. Loss of eligibility may result if the ownership changes or if the owner moves out of the property or loses District domicile. Similarly, the property owner must notify DOEE in the event that the rental unit assigned to Solar for All is no longer rented by an income-eligible household.
2. **Solar for All Renters Policy:** In order to qualify for Solar for All, the renter must meet income eligibility requirements, regardless of the property-owner’s income status. In the following cases, the property is eligible for Solar for All:

* Property owner is income eligible and occupies the home
* Both property owner and renter are income eligible
* Property owner is not income eligible, but tenant is income eligible.

If the property owner is income eligible, but the renter is not income eligible, then the property does not qualify for Solar for All.

1. **Rent increases**

The property owner shall agree not to raise the rent of the participating Solar for All tenant unit as a direct result of the Solar for All solar energy installation or Solar for All benefit. The tenant must be notified of this provision. This applies to all cases unless the property receives a utility allowance from HUD, in which case the rent automatically increases when utility bills decrease. In these cases, the grantee and property owner must develop a DOEE-approved plan to pass the savings and benefits on to the residents.

1. **LIHEAP Benefits**

Grantees shall disclose to Solar for All participants that as a result of signing up for Solar for All, they may be eligible for an adjusted LIHEAP benefit. This applies only to Solar for All participants that receive an ongoing direct monetary benefit from Solar for All (e.g. an electric bill credit, regular checks, etc.).

For FY19, Solar for All participants with an electric heat source that apply for LIHEAP will be eligible for the approximately $500 Solar for All credit over the year, as well as at least the minimum LIHEAP benefit of a $250 one-time credit on their electric bill. Solar for All benefits will not impact residents’ ability to receive emergency LIHEAP funding. For households participating in both Solar for All and LIHEAP that have oil or gas heating sources, their LIHEAP benefits will not be affected in FY19. However, DOEE may change this policy in future years, as funding and need varies year by year. Since Solar for All beneficiaries will see savings for 15 years, their LIHEAP benefits may be adjusted in any of those 15 years.

Ultimately, LIHEAP benefits will be based on energy usage and energy burden. And over time, Solar for All participants will naturally need less bill assistance as their Solar for All benefits accrue.