

MEMORANDUM

TO: Tommy Wells *TW* 7-1-2022
Director

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Associate Director, Policy & Compliance

FROM: Thomas Bartholomew
Branch Chief, Renewable Energy & Clean Transportation

DATE: July 1, 2022

SUBJECT: Proposed Changes to Solar for All Application and Income Verification Process

The Solar for All (SfA) program has, since its inception, leveraged the income verification process of the Low Income Home Energy Assistance (LIHEAP) program. This, however, presents a downside as the income threshold for LIHEAP is lower than for SfA. The discrepancy in income thresholds means that income-qualified SfA clients that are not otherwise automatically qualified through another government program and whose income is above the LIHEAP threshold, must qualify by completing the LIHEAP application process, even though they will be denied a LIHEAP benefit. In addition, because LIHEAP is a federal program, its application requires documentation and information beyond what SfA needs to require.

Currently, at least 20% of SfA applicants that need to complete the LIHEAP application for income verification end up not completing the LIHEAP application because it is too cumbersome. As such, SfA would benefit from being able to income qualify clients through its own income verification process as part of the SfA application. By building income verification into the SfA application, the overall application process will be simpler for clients to complete, meaning more potential clients will sign up for the program. This memo lays out proposed SfA income verification and application changes for your consideration and approval.

Proposed SFA Income Verification Process

- The SFA application processor will first check to see if the applicant is categorically eligible through their current participation in one of the following programs:¹
 - Temporary Assistance for Needy Families (TANF);
 - Supplemental Nutrition Assistance Program (SNAP);
 - Supplemental Security Income (SSI);
 - the District’s Housing Choice Voucher Program;
 - Low Income Home Energy Assistance Program (LIHEAP);
 - Residential Aid Discount Program (RAD); or
 - STAY DC.

- If income eligibility cannot be determined categorically by program participation, the application processor will then determine if resident resides in income-qualified property that DOEE is able to verify through review of an affordability covenant and rent rolls.

- If verification cannot be determined by program participation or affordability covenant/rent rolls, the processor will then calculate gross household income by one of the following methods:
 - Current paycheck/paystub - Processor will multiply the gross total amount on the paycheck/paystub by 26 or 24, depending on the length of the pay period.
 - Most recent tax return - Processor will make sure that the tax return is from the most recent tax year and look at the total income for the household.
 - Social Security statement - Processor will make sure that the statement is from the current calendar year and multiply the gross monthly amount by 12.

Proposed Online Application Form Changes

- Address Details:
 - Move to bottom and make optional: “Primary Heating Source” field.
- Household Details:
 - In each household member section, add a required upload box to upload proof of income. Include option to upload multiple files.
 - The upload box should be labeled “Proof of Income” and have this description: “Please upload proof of income for each household member who earns an income:
 - Accepted documents: A paycheck from the last month, a tax return from the most recent tax year, an unemployment statement or a Social Security statement from the current calendar year.
 - If you receive child support, please upload documentation or a print-out from the District Child Support Services Division that shows the child support payments.

¹ DOEE is exploring with OTR the possibility of verifying income based on income tax returns or receipt of the Earned Income Tax Credit (EITC).

- If you claim zero income, please upload a zero-income statement.² The zero-income statement must include (a) a statement of zero income and (b) be signed and dated by you before a notary.”

Attachment – 1

1- Solar for All Income Verification Guidance

² Link to template zero income statement:

https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/DOEE%20Income%20Affidavit_financial%20%284%29.pdf