



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 or SFA). 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 (AMI)), and to reduce their energy bills by 50% (based on the 2016 residential rate class average usage) by 2032.

Per the Act, 80% of AMI (or Median Family Income (MFI)) 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>

Income will be verified for Solar for All recipients through one of the four pathways below. The DOEE Solar for All program intake team must receive information on each household. This information will be used to generate a complete list of Solar for All participants in order to prevent multiple entities from targeting the same households. The entity that performs the subscriber recruitment activity (the “SFA Recruiter,” i.e., DOEE’s Solar for All team or one of DOEE’s grantees or contractors) 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 (One-time Income Verification)
3. Solar for All Benefit for Income-Qualified Households that do not qualify under Pathways #1 or #2 (One-time 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 SFA Recruiter must meet related to rental units and Low Income Home Energy Assistance Program (LIHEAP) benefit disclosures.

I. Income Verification Pathways

1. 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 a solar system on the home. This is a one-time income verification requirement.

The SFA Recruiter must collect a potential recipient's information on the Solar for All Program Application form, along with the applicant's signature and supporting documentation. If a DOEE grantee or contractor collects the information, they must provide the signed application form and supporting documentation to their Solar for All grant manager or contract administrator.

In addition to basic demographic information, the SFA Recruiter 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:

- (a) Temporary Assistance for Needy Families (TANF);
- (b) Supplemental Nutrition Assistance Program (SNAP);
- (c) Supplemental Security Income (SSI);
- (d) the District's Housing Choice Voucher Program;
- (e) Low Income Home Energy Assistance Program (LIHEAP);
- (f) Residential Aid Discount Program (RAD); or
- (g) STAY DC.

If a household may be categorically eligible, the SFA Recruiter 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 SFA Recruiter 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 submit the following information to solarforall@dc.gov:

- Current paycheck/paystub – Application 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 – Application 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 – Application processor will make sure that the statement is from the current calendar year and multiply the gross monthly amount by 12.

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

2. Pathway Two: Solar for All Benefit for Households in Affordable Housing Properties (One-time 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 SFA Recruiter must ensure that the property will remain under an affordability covenant that aligns with the Solar for All Program income guidelines for the duration of the period the solar benefit will be provided to eligible residents of the property. 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:

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

In addition, the SFA Recruiter must work with the owner or property manager to obtain the information required for the Solar for All Affordable Unit Information Request Form; DOEE grantees or contractors must provide this information to their Solar for All grant manager or contract administrator, as applicable.

A DOEE grantee or contractor must also submit a notarized Affidavit Confirming Solar for All Affordable Unit Information.

The SFA Recruiter is required to communicate to the low-income household that they are legally obligated to report to the SFA Recruiter and DOEE (if SFA Recruiter is not DOEE's Solar for All team) if their status changes and they become ineligible for Solar for All (i.e. income too high).

For DOEE's Solar for All Innovation and Expansion grantees, DOEE reserves the right to require the grantee to recertify households as often as annually, a requirement the grantee agreed to as a DOEE award recipient. However, in the meantime DOEE requires the grantee to provide the names, addresses, and account numbers of recipients so that DOEE can conduct periodic eligibility monitoring to ensure appropriate income targeting of benefits.

3. Pathway Three: Solar for All Benefit for Income-Qualified Households (One-time 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 will be certified upon entering the program and then monitored going forward to ensure appropriate benefit targeting. The SFA Recruiter is required to communicate to the low-income household that they are legally obligated to report to the SFA Recruiter and DOEE (if SFA Recruiter is not DOEE's Solar for All team) if their status changes and they become ineligible for Solar for All (i.e. income too high).

For DOEE's Solar for All Innovation and Expansion grantees, DOEE reserves the right to require the grantee to recertify households as often as annually, a requirement the grantee agreed to as a DOEE award recipient. However, in the meantime DOEE requires the grantee to provide the names, addresses, and account numbers of recipients so that DOEE can conduct periodic eligibility monitoring to ensure appropriate income targeting of benefits.

The SFA Recruiter must collect a potential recipient's information on the Solar for All Program Application form, along with the applicant's signature and supporting documentation. If a DOEE grantee or contractor collects the information, they must provide the signed application form and supporting documentation to their Solar for All grant manager or contract administrator, as applicable.

In addition to basic demographic information contained within the application form, the SFA Recruiter 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:

- (a) Temporary Assistance for Needy Families (TANF);
- (b) Supplemental Nutrition Assistance Program (SNAP);
- (c) Supplemental Security Income (SSI);

- (d) the District’s Housing Choice Voucher Program;
- (e) Low Income Home Energy Assistance Program (LIHEAP);
- (f) Residential Aid Discount Program (RAD); or
- (g) STAY DC.

If a household may be categorically eligible, the SFA Recruiter 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 SFA Recruiter 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 by DOEE.

Households that do not demonstrate categorical eligibility must submit the following information to solarforall@dc.gov:

- Current paycheck/paystub – Application 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 – Application 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 – Application processor will make sure that the statement is from the current calendar year and multiply the gross monthly amount by 12.

Note: If households are unable to submit information online, DOEE may arrange an intake event in conjunction with the grantee or contractor, if applicable.

4. 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 to DOEE and DOEE’s grantee or contractor, if applicable, during the 15-20 year period if the property is no longer an affordable housing property, within 90 days of the change in eligibility

For the provision of 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 SFA Recruiter must document how the benefits will flow to income-

eligible households over the 15-20 year period. The SFA Recruiter must verify that the property receiving the capital improvement serves low income residents, one time up front. The SFA Recruiter must also demonstrate how the savings will serve low-income residents. Finally, the SFA Recruiter 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 SFA Recruiter must verify a participating household as income-qualified using this protocol prior to the household receiving such benefits. This is a one-time income verification requirement.

The SFA Recruiter must collect potential recipient information on the Solar for All Program Application form, along with the applicant's signature and supporting documentation. If a DOEE grantee or contractor collects the information, they must provide the signed application form and supporting documentation to their Solar for All grant manager or contract administrator, as applicable.

In addition to basic demographic information, the SFA Recruiter 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:

- (a) Temporary Assistance for Needy Families (TANF);
- (b) Supplemental Nutrition Assistance Program (SNAP);
- (c) Supplemental Security Income (SSI);
- (d) the District's Housing Choice Voucher Program;
- (e) Low Income Home Energy Assistance Program (LIHEAP);
- (h) Residential Aid Discount Program (RAD); or
- (i) STAY DC.

If a household may be categorically eligible, the SFA Recruiter 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 SFA Recruiter 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 by DOEE.

Households that do not demonstrate categorical eligibility must submit the following information to solarforall@dc.gov:

- Current paycheck/paystub – Application 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 – Application 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 – Application processor will make sure that the statement is from the current calendar year and multiply the gross monthly amount by 12.

Note: If households are unable to submit information online, DOEE may arrange an intake event in conjunction with the grantee or contractor, if applicable.

II. Additional Requirements

Additional requirements are listed below.

1. **Cancellation:** In all cases, the SFA Recruiter 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 of the change in eligibility. 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. If the property owner is income eligible, but the renter is not income eligible, then the property does not qualify for Solar for All based on DOEE's Solar for All Renters Policy.
3. **Rent increases:** The property owner shall agree not to raise the rent of the participating Solar for All tenant unit because of the Solar for All solar energy installation or Solar for All benefit. The tenant must be notified of this provision. This limitation 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 SFA Recruiter and property owner must develop a DOEE-approved plan to pass the savings and benefits onto the residents.
4. **LIHEAP Benefits:** The SFA Recruiter shall disclose to Solar for All participants that, as a result of signing up for Solar for All, they may be subject to an adjusted LIHEAP benefit. This requirement 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.).

In fiscal year 2022 (October 1, 2021 – September 30, 2022), if a Solar for All participant has a Pepco account, the Solar for All participant will be eligible for the approximately \$500 Solar for All benefit over the fiscal year, as well as at least the minimum LIHEAP benefit of a \$250 one-time credit on either the Solar for All participant's gas or electric bill.

Solar for All benefits will not impact the Solar for All participant's ability to receive emergency LIHEAP funding. However, DOEE may change this policy in future years, as funding and need vary year by year. As a Solar for All benefit recipient, the Solar for All participant will see savings for at least 15 years and their LIHEAP benefits may be adjusted in any of those 15 years. Ultimately, LIHEAP benefits will likely be based on energy usage and energy burden.