



## **Rationale Document – ABP Collection of Demographic and Geographic Data**

**February 15, 2022**

The IPA deeply appreciates stakeholder comments received through its stakeholder comment processes conducted in late 2021 on the proposed process for collection of demographic and geographic data. The Agency understands the implementation of the data collection process carries significant consequences for Program participants and other stakeholders based upon the feedback provided by stakeholders. Comments received helped the Agency in planning for the reopening of the Adjustable Block Program (“ABP” or the “Program”) and the development of the draft of the [2022 Long-Term Renewable Resources Procurement Plan](#), which was released for public comment on January 13, 2022.

The Agency provides this rationale document to offer explanation as to how and why decisions were made around the collection of demographic and geographic data consistent with the requirements of Public Act 102-0662. The processes described herein will be put into place starting February 17, 2022. As discussed below, these processes may be revised and updated through the process of the approval of the 2022 Long-Term Renewable Resources Procurement Plan.

As explained in the Agency’s [Request for Stakeholder Feedback](#) on this topic, Section 1-75(c-20) of the Illinois Power Agency Act requires the Agency to “collect data from program applicants in order to track and improve equitable distribution of benefits across Illinois communities for all procurements the Agency conducts.” This section specifically requires the Agency to collect certain information, including but not limited to the racial or ethnic identities and geographic residencies of employees and agents of Program applicants and participants.

The Agency has determined that a two-part data collection process will be utilized to collect demographic and geographic information required under the Act; that is, information will be collected both through project applications and through the annual report submitted by Approved Vendors.

The Program Administrator has developed, within the ABP Portal, a system for collection of certain project-specific information at the Part II application. In order to facilitate the ongoing tracking and collection of information from Approved Vendors’ employees and subcontractors, the Part II application will now collect information on the race, gender, and residential ZIP code of all employees or employees of subcontractors involved in the construction/installation of a particular project and the approximate hours worked. Approved Vendors will also be required to indicate whether any of the workers involved in the construction/installation of the project are graduates from the Solar Training Pipeline Program, Solar Craft Apprentice Program, Multi-Cultural Job Training Program, or another job training program. As additional workforce



development programs established by Public Act 102-0662 come online, they will be added to the options available for selection.

The Part II application will ask Approved Vendors to provide the aggregate hours worked by employees and/or subcontractors in construction and installation of the project by 1) race, 2) ethnicity, 3) residential ZIP code of the worker, and 4) status as a graduate of a qualifying job training program. This data will not be requested at the employee level. For example, an Approved Vendor will submit the total hours worked on a project by employees or subcontractors from a certain ZIP code. Those projects which were Commission-approved or constructed prior to the enactment of Public Act 102-0662 (i.e., on or before September 15, 2021) will be eligible for a waiver of this requirement if the information is not available for the project.

The Agency has concluded that some information may be more appropriate to report on an annual basis due to the sensitivity of the collection of that data. The Agency received stakeholder feedback surrounding the heightened sensitivity of disclosures surrounding foster care history and former incarcerated status. Accordingly, the Agency will not require Approved Vendors to submit this information as part of a project application at Part II. Instead, during the initial Approved Vendor application and annual reporting processes, Approved Vendors will have the option to submit the number of employees who are graduates of or currently enrolled in the foster care system and the number of employees who were formerly incarcerated. This information request will be limited to employees for the Approved Vendor's Illinois-based workforce.

The Agency finds that this two-part approach to collection of the required data will balance the statutory goals and requirements surrounding the collection of this information with the burden on Program participants in providing the information. The Agency believes this will alleviate the need for Approved Vendors to track and compile this data throughout the year and provide all of the information with the annual report. The Agency also recognizes the sensitivity of disclosures by employees and subcontractors related to certain topics, and accordingly will seek some information only annually and as an optional item on the annual renewal of the Approved Vendor's status with the Program. The Agency will also take comment on this approach through the Long-Term Renewable Resources Plan development process, which is currently ongoing. For information on how to participate in that process, please see the Agency's announcement related to the publication of the [draft 2022 Long-Term Plan](#). These reporting requirements may be modified through the Plan approval process, which is expected to be finalized no later than July 19, 2022.