

# Questions & Answers from April 15, 2026 Minimum Equity Standard Compliance Webinar



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## General

*Will the slide deck be provided after this webinar?*

- A recording of the webinar and a copy of the presentation slides has been posted to <https://illinoisshines.com/webinars/>

*What is the difference between MES and EEC?*

- The MES requires a certain percentage of an Approved Vendor or Designee's workforce to be Equity Eligible Persons. The purpose of the MES is to ensure increasing access to employment in the Illinois clean energy sector for those who historically have been excluded from such opportunities. An EEC is a business that is majority-owned by eligible persons, a nonprofit or cooperative that is majority governed by Equity Eligible Persons, or is a natural person that is an eligible person offering personal services as an independent contractor. EECs may be EEC Approved Vendors, EEC Designees, or EEC Subcontractors. More information on the distinctions between these three types of EECs can be found on the Become an EEC webpage: <https://illinoisshines.com/become-an-equity-eligible-contractor-eec-approved-vendor-or-designee/>.

*If you are a 1 person company and you are an EEP, will that mean you are 100% qualified for MES?*

- If your company has 1 employee who is a registered EEP, you have exceeded the MES percentage of 14% (by meeting 100%). This is only true if you have been certified as an EEP either through the Equity Portal or through the Year-End Report Process.

*Can you clarify what IPA considers "utility-scale" projects?*

- The IPA manages programs such as Illinois Shines and Illinois Solar for All but also has indexed REC RFP processes. You can learn more about indexed REC projects here <https://www.ipa-energyrfp.com/indexed-renewables/>.

*Does the 14% MES requirement apply to all solar installers, or just EECs?*

- ALL Illinois Shines Program participants (registered Approved Vendors and Designees) are required to comply with the MES, meaning that at least 14% of your workforce must be comprised of EEPs.

*If Company A buys a project from Company B, and Company A submits the project to the ABP program– does Company A need to report on the workforce of Company B that had been involved with these projects before acquisition?*

- Both company A and company B would submit their own MES reports (if they are both active participants in Illinois Shines).

*Are all solar projects required to comply with the MES, regardless of size?*

- The MES requirement applies to the Illinois-based Illinois Shines workforce on all projects developed for the Illinois Shines program.

## Project Workforce Definition

*Does the total workforce for the Program include all workforce across all Illinois Shines projects during the Program Year? For example, several separate community solar projects that participate in Illinois Shines throughout the Program Year.*

- Yes, your MES report will include your total Illinois-based Illinois Shines workforce across all of your projects. You won't be submitting a report on each project, but rather your entire portfolio.

*Are employees who visit Illinois to work on a project a couple times a year, but are not based in Illinois, counted in our workforce?*

- All workers whose duties are physically performed in Illinois are included in the IPA's "project workforce" definition for Illinois Shines, regardless of where they live. All employees who work physically in Illinois for any amount of time are included in the IPA's "project workforce" definition.

*Our company is not located in Illinois. For our MES calculations, do we just count any employees that perform work in Illinois?*

- Yes, as an out of state company, you would include in your workforce calculations only those individuals who worked on Illinois Shines projects physically in the state of Illinois.

*Should remote workers IN the state of Illinois be included in MES reporting?*

- Only workers whose duties are physically performed in Illinois should be included in the "project workforce," regardless of where they live. Individuals who do not physically work in Illinois do not count towards the project workforce. For example, if a worker is remote and physically working in the state of Illinois, they must be counted towards the project workforce.

## Equity Eligible Persons (EEPs)

*What if there are not enough EEPs registered to fulfill these increasing requirements?*

- The Agency will grant MES waivers where the applicant provides evidence of significant due diligence toward meeting the Minimum Equity Standard, including, but not limited to, having submitted an MES Mid-Year Report. Entities may be granted a waiver by receiving a minimum score of 20 points (16 points for entities that do not work with subcontractors) based on the MES Waiver scoring rubric. Waiver templates can be found in Appendix J of the Program Guidebook and waiver request forms can be found on the Equity Accountability System Overview page on the Program website:  
<https://illinoisshines.com/equity-accountability-system-hub/>.

*How often do EEPs need to renew their EEP status?*

- The EEP renewal timeline is based on how they qualified as an EEP. Any EEPs who qualify through residence in an EIEC are required to be re-certified by the IPA every two years

through the Energy Equity Portal (<https://energyequity.illinois.gov/>) or through their employer's MES Combined Compliance and Year-End Report. For all other qualification criteria (former incarceration, foster care, or qualified job training participation), EEPs do not need to renew and retain lifelong EEP status. For questions about EEP certificates, please email [IPA.EnergyEquity@Illinois.gov](mailto:IPA.EnergyEquity@Illinois.gov).

***The majority owner of the company must be an EEP to become an EEC. What training can a person take to allow them to become an EEP?***

- To see which training programs qualify an individual as an EEP, please see the lists titled "FEJA Grantees List" and "CEJA Grantees List" on the Equity Portal: <https://energyequity.illinois.gov/job-seekers/education-and-training.html>.

***Do we have to provide EEP qualification documentation for EEPs of our subcontractors that we include in our total IL project workforce?***

- All EEPs that you wish to count towards the MES are required to be certified by the IPA through qualifying documentation, whether they are employees of the AV or the subcontractor. EEPs can be registered in the Energy Workforce Equity Portal (<https://energyequity.illinois.gov/>), or by providing EEP attestations and supplemental documentation in your Report submission.

***Is IPA able to change the qualifying criteria for EEP status?***

- The definition of "Equity Eligible Person" was established through the enactment of Public Act 102-0662 (CEJA). Since the inception of the Illinois Shines program, the IPA had adhered to that definition and intends to continue to do so moving forward.

***Is there a list of EEPs we can refer to?***

- Access to the EEP List on the Equity Portal is only available to companies that are registered as clean energy companies on the Equity Portal. Any member of an approved clean energy company can be added to have access. To register as a clean energy company on the Equity Portal: <https://app.smartsheet.com/b/form/4e3bf9f0a63e4cb8b77c05c27c3dcc10>

***If our company utilizes an outside recruiting firm for hiring needs, can we get them access to the EEP portal?***

- Access to the EEP List on the Equity Portal is only available to companies that are registered as clean energy companies on the Equity Portal. Any member of an approved clean energy company can be added to have access. To register as a clean energy company on the Equity Portal: <https://app.smartsheet.com/b/form/4e3bf9f0a63e4cb8b77c05c27c3dcc10>

***Does NABCEP certification qualify graduates for EEP status?***

- No, the workforce trainings programs that qualify someone for EEP status are: Clean Jobs Workforce Network Program, the Clean Energy Contractor Incubator Program, the Illinois Climate Works Pre-apprenticeship Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the Solar Training

Pipeline and Multicultural Jobs Program. NABCEP certification does not qualify an individual for EEP status.

## Submission Process

*Is there a way to view the form questions without submitting?*

- Yes, templates are available for you to review before filling out the actual form. The template will be uploaded towards the bottom of this page <https://illinoisshines.com/minimum-equity-standard/>. You can also find the templates in Appendix Q of the PY 26-27 Program Guidebook.

*Will EEPs who work for an EEC still be counted at the 1.5x rate for purposes of MES?*

- Yes, the Agency will maintain the 1.5 times calculation for EEPs employed by an EEC so that the benefit applies to both entities partnering with EECs, as well as EECs themselves.

*We are currently registered as an Approved Vendor but will not be submitting project applications until 2026-2027. No on-site work has been done in Illinois, only calls with the landowner and remote engineering and site analysis. Do we request a waiver for the 2025-2026 year?*

- A waiver is not needed in this situation. There is a question in the MES report that asks whether or not you participated in Illinois Shines during the previous year. For this question, you can respond "no", which will be the end of your Year-End Report section. The Program Administrator may reach out for more information if an entity states that it did not participate during the Program Year.

*If my company (which is an AV) acquires a solar project that is also registered as an AV, would we start submitting two Year-End Reports and Compliance Plans (one for each AV?) Or would they be combined?*

- Your MES report will include your total workforce across all of your projects. You won't be submitting a report on each project, but rather your entire portfolio.

## Small Business Safe Harbor

*How can a new Designee (Sales and Marketing) with 3-4 employees that are remote workers plan to comply with the MES? As a new Designee, adding new employees to a new workforce can be a challenge while beginning operations.*

- All entities must submit an MES Combined Compliance and Year-End Report. During the 2026-27 Program Year, when the required MES is 14% of total project workforce, entities with 8 or more employees will be required to have at least 1 EEP on staff. If your company employs remote workers who live and work in Illinois, they should be included in your total project workforce. If the remote employees are based out-of-state, they should not be counted. You will be able to demonstrate this through your Combined MES Compliance and Year-End Report. Companies with less than 8 employees may qualify for the "Safe Harbor Approach" which is outlined on pg. 129 of the Draft Program Guidebook PY26-27 <https://illinoisshines.com/wp-content/uploads/2026/03/Illinois-Shines-2026-27-Draft-Program-Guidebook.pdf>

### ***Do entities with less than 8 employees need to submit MES reporting?***

- If you are registered in the Program as an Approved Vendor or Designee, regardless of your workforce size, you are required to comply with and report on your MES compliance. This includes submitting an MES Combined Compliance and Year-End Report. In your report, you will provide information on the size of your workforce. The process is outlined on page 129 of the Program Year 2026-27 Program Guidebook: <https://illinoisshines.com/wp-content/uploads/2026/03/Illinois-Shines-2026-27-Draft-Program-Guidebook.pdf>

***What if we are a small rural company and unable to find EEPs? This requirement has been a bit difficult the past couple years and also makes our team members that do fit the EEP description feel discriminated against based on where they live (if that is what qualifies them as an EEP). We understand the overall goal of this program, but it is difficult for rural small businesses with 15-20 employees.***

- If an entity is struggling to meet the MES, they may apply for a Waiver from the MES. The Agency may grant a waiver from the MES requirement in rare cases. The Agency will grant waivers where the applicant provides evidence of significant due diligence toward meeting the Minimum Equity Standard. More details on this process can be found on page 128 of the Program Guidebook. Additionally, EEP information is only published on the Equity Portal if the individual has opted in to do so. If an EEP no longer wants their information shared on the Equity Portal, they can email the Agency at [IPA.EnergyEquity@illinois.gov](mailto:IPA.EnergyEquity@illinois.gov) to have it removed.

***Does the program track attendance at webinars for the "collaborate with the program administrator" category of safe harbor activities or do AVs need to present some evidence of attendance with the year end report?***

- You may be asked to provide documentation to prove efforts towards outreach and participation. If you claim to have participated in a webinar, the Program Administrator may ask to verify this.

***If our workforce is under 8 workers, do we need to complete the MES Combined Compliance and Year-End Report?***

- If you are registered in the Program as an Approved Vendor or Designee, you are required to comply with and report on your MES compliance. If during the 2025-26 or 2026-27 Program Years you have under 8 employees, hired during the Program Year, and did not hire an EEP, you would be able to comply using the Small Business Safe Harbor approach.

## **5% REC Value Threshold**

***How can I find out what the value of my AVs REC contract is?***

- If you are an AV, the REC contract value can be found in either the Schedule A or Schedule B of your projects. The Agency publishes reports that includes the REC contract value for all contracted projects here: <https://illinoisshines.com/project-application-reports/>.