

Adjustable Block Program
Annual Report Job Training and Solar Workforce Diversity Reporting
Requirements and Process

July 30, 2020

Background

The [Revised Long-Term Renewable Resources Procurement Plan](#) (“Revised Plan”) includes a provision to add a new component to the Approved Vendor Annual Report:¹

Other information related to ongoing program participation, including use of graduates of job training programs and other information related to increasing the diversity of the solar workforce.

In ICC Docket No. 19-0995 approving the Revised Plan, the Illinois Power Agency (“IPA”) committed to seeking stakeholder feedback on how this information should be reported. As stated in that proceeding, this trainee and diversity information would be collected for informational purposes; the Agency will not consider failure of an Approved Vendor to hire trainees or diversify their workforce as criteria for continuation of the Approved Vendor’s status.²

The Program Administrator opened the Annual Report portal for Approved Vendors on July 1, 2020, and Annual Reports were due on July 15, 2020. The portal did not include spaces for entries related to hiring of graduates of job training programs and workforce diversity; instead, those will be collected through a separate process as described below with a due date of October 13, 2020.

Request for Feedback Process

On June 18, 2020 the Program Administrator released a [request for stakeholder feedback](#) on the job training and solar workforce diversity reporting requirements. The due date for comments was initially June 26, 2020 and was subsequently extended to July 2, 2020. [Comments](#) were received from Carbon Solutions Group, Illinois Solar for All Working Group, Joint Solar Parties, and Michael Lewis Company. The IPA appreciates the thoughtful comments provided by stakeholders and has incorporated many of those suggestions into the finalized requirements described below.

Information Reporting

A. Reporting of job training and workforce diversity information will be at the Approved Vendor level rather than reporting for each Adjustable Block Program project separately. Approved

¹ For the other requirements of the Approved Vendor Annual Report, see page 164 of the Revised Plan.

² IPA Response in ICC Docket No. 19-0995 at 65. The ICC accepted this approach in their Final Order approving the Revised Plan (See Docket No. 19-0995, Final Order dated February 18, 2020 at 87).

Vendors will be expected to report on the use of job training graduates and the Approved Vendor's workforce diversity in aggregate. In the case where a project or an Approved Vendor has changed ownership during the reporting period, the current owner should endeavor to collect any applicable information from the previous owner.³

- B. For the Annual Report, information will be reported in two categories, Direct and Indirect.
- a. Direct means hiring and employment by the Approved Vendor, e.g., staff on the Approved Vendor's payroll. For Approved Vendors that are LLCs without any employees, this hiring and employment information should be reported at the parent company level. Reporting should be limited to activities undertaken in relation to the marketing, sale, development, and operation of projects participating the Adjustable Block Program. If the Approved Vendor or parent company does not have any employees, then the Approved Vendor should indicate that fact, and only indirect hiring reporting is necessary.
 - b. Indirect means hiring and employment conducted by the Approved Vendor's Designees, installers, marketing/sales sub-contractors, and other entities with which it works as it relates to the marketing, sale, development, and operation of projects participating in the Adjustable Block Program. To the extent information is available, Approved Vendors should request that Designees and other sub-contractors provide information related to those entities' sub-contractors work conducted in connection with Adjustable Block Program projects.
- C. For this first Annual Report, reporting will be based on all the Approved Vendor's activities related to the Adjustable Block Program from the Program opening on January 31, 2019 through May 31, 2020. Future Annual Reports will cover activities correlated to energy delivery years (June 1 to May 31). To the extent divisible, work related to the Illinois Solar for All Program should not be included, as that will be reported on separately. However, to the extent Approved Vendors and their subcontractors conducted project development and related work prior to January 31, 2019 that would be relevant to the use of job training graduates or the diversity of the solar workforce in Illinois, that information should be noted and reported in the narrative summary.

³ For Single-Project Approved Vendors, the Agency will expect reporting to continue through the compliance period when the project is completed and energized, and ongoing reporting will not be required after that year.

- D. Reporting on hiring of graduates of job training programs should only include graduates working in Illinois. Likewise, workforce diversity reporting should only include Illinois-based workforce.
- E. The Future Energy Jobs Act (“FEJA”) created and provided funding for three specific job training program categories (Solar Training Pipeline Program, Craft Apprenticeship Program, and Multi-Cultural Jobs Programs).⁴ Quantitative reporting concerning trainees hired will distinguish between graduates of each of these programs and graduates of other training programs.
- F. The Agency will publicly report aggregated data and other information from the Annual Reports that does not identify the specific Approved Vendor.
- G. The Program Administrator expects to open a new portal for Approved Vendors to submit Job Training and Solar Workforce Diversity information on August 17, 2020. The due date for Approved Vendors to submit information will be October 13, 2020.
- H. As this is the first year of this reporting requirement, the Program Administrator will seek feedback from Approved Vendors on the efforts required to gather the required information and how the process can be improved for the next reporting year.

Each Approved Vendor will be asked to submit:

- 1. Narrative Information (to be submitted via document uploads)
 - a. A narrative description of the use of job training program graduates in connection with the Approved Vendor’s Adjustable Block Program projects during the reporting period.
 - i. Information that should be included:
 - 1. Efforts undertaken to recruit/hire trainees (including successes as well as challenges found),
 - 2. If trainees were hired on a temporary or permanent basis, a part-time or full-time basis,
 - 3. Job training program graduate retention rates,
 - 4. Any layoffs of job training program graduates,

⁴ For more information on job training programs, see: <https://www.illinoissfa.com/job-training/>.

5. If available, information on the hiring of job training program graduates who are returning citizens or foster care alumni.
 - ii. If graduates of training programs other than those in the three FEJA-categories were used, a description of those other training program(s).
 - iii. Approved Vendors should distinguish between information related to their Direct and Indirect activities based on the description in B. above.
 - b. A narrative description of the Approved Vendor's efforts related to increasing the diversity of its solar workforce working on Adjustable Block Program projects during the reporting period.
 - i. This description should distinguish between increasing diversity of the installation workforce and workforce in administrative, sales, marketing, and technical roles.
 - ii. Approved Vendors should describe the diversity of management and/or supervisory positions compared to their overall workforce working in connection with the Adjustable Block Program.
 - iii. Approved Vendors should distinguish between information related to their Direct and Indirect activities based on the description in B. above.
 - c. If applicable, a narrative description of activities of undertaken by the Approved Vendor prior to January 31, 2019 that demonstrates the Approved Vendor's use of job training program graduates, or the development of a diverse solar workforce.
 - d. If applicable, a narrative description of activities undertaken by the Approved Vendor, or their Designees that did not occur in Illinois but demonstrates the Approved Vendor or their designee's efforts or commitments to creating a diverse workforce. Any information described herein should not be included in the Quantitative Information Section.
 - e. An assessment of the efforts required to compile the information for this report and any recommendations to improve the reporting process for future years.
 2. Quantitative Information
 - a. For reporting quantitative information, the Approved Vendor will submit information separately for Direct and Indirect work (as described in B. above).
 - b. Percentage of workforce should be calculated based only on workforce working on Adjustable Block Program projects or other Adjustable Block Program-related efforts. The Approved Vendor should specify how calculated (e.g., hours worked, Full-Time Equivalent ("FTE"), or another methodology as described by the Approved Vendor). FTE reporting may be good faith estimates and can be reported in increments of 0.1 FTE.

- c. Approved Vendors should clearly differentiate between information that is not available (“N/A”) and where the response is that no one was hired (“0” or “None”). For information that is not available the Approved Vendors should provide an explanation in the narrative on why the information was not available.

Sample Templates (One each for Direct and Indirect reporting)

Job Training Hiring for Development of Adjustable Block Program Projects

| | # Full-Time | # Part-Time | # Temporary ⁵ | # Hired (Total) | Average Wage (\$/Hour) |
|---------------------------------|-------------|-------------|--------------------------|-----------------|------------------------|
| Solar Training Pipeline Program | | | | | |
| Craft Apprenticeship Program | | | | | |
| Multi-Cultural Jobs Programs | | | | | |
| Other Job Training Program | | | | | |
| _____ | | | | | |
| (add rows as needed) | | | | | |

Illinois-based Workforce Diversity

| | FTE | % of workforce ⁶ |
|---|-----|-----------------------------|
| Race | | |
| Black or African-American | | |
| Hispanic or Latinx | | |
| Asian | | |
| American Indian or Alaska Native | | |
| Native Hawaiian or Other Pacific Islander | | |
| Two or more races | | |
| Did not self-identify/Not disclosed | | |
| Gender Identity | | |
| Female | | |
| Non-binary | | |
| Disabled | | |

⁵ Workers hired on a temporary basis should be included only in this category, and not as full-time or part-time in the preceding columns.

⁶ The workforce denominator used to calculate this percentage should refer only to work done in Illinois in connection with the Adjustable Block Program (i.e., it should feature the same methodology as when reporting on the numerator).

| | | |
|--|--|--|
| Veteran | | |
| | | |
| Workforce percentage calculation methodology | | |