

**Stakeholder Feedback from the  
LiUNA Midwest Region  
on the  
Assessment of the Equity Accountability System**

The Illinois Power Agency – and, hopefully, at some point in the future, the General Assembly – should recognize that the current definition of “Equity Eligible Person” (EEP) and, specifically, the definition of “Equity Investment Eligible Community” (EIEC) makes it extremely difficult to meet the Minimum Equity Standard (MES) in downstate Illinois. **Population data, including EIEC population data, should be considered not only when assessing the accuracy of the Equity Accountability System (EAS) and evaluating its success, but also when determining whether the MES should apply in its entirety to a downstate renewable energy project.**

It is an incontrovertible fact that the vast majority of EEPs will receive that designation by virtue of their residence in an EIEC.

According to the Prison Policy Initiative, Illinois had just under [24,000 returning citizens in 2019](#). If one were to extrapolate that figure over a ten-year period it would amount to less than 238,000 people. That is a small fraction (4.5%) of Illinois’ cumulative EIEC population – and that assumes zero returning citizens live in EIECs.

Further, the returning citizen qualification is a difficult one to determine. LiUNA does not, has not and will not ask prospective members if they are returning citizens; it has no bearing on their ability to perform as construction laborers. This policy predates the establishment of Section 2-103.1 of the Human Rights Act (775 ILCS 5), which makes it a “civil rights violation for any... labor organization to use a conviction record... as a basis to refuse to hire, to segregate, or to act with respect to recruitment, hiring, promotion, renewal of employment, selection for training or apprenticeship, discharge, discipline, tenure or terms, privileges or conditions of employment.” Given that legal prohibition, it is unlikely, and perhaps inadvisable, that any union inquire into the criminal history of a prospective member. Finally, there is no known database of returning citizens from which to recruit.

For similar logistical (but not legal) reasons, foster care participants will also not likely represent a large number of EEPs. According to the Illinois Department of Children and Family Services (DCFS), there were [fewer than 8,000 foster children in Illinois](#) on March 31, 2024. Even if one were to assume that there were 8,000 kids in foster care for each of the last 10 years, and assuming that each child was now seeking employment in the construction industry, that would represent less than 80,000 potential foster care graduates who would be EEPs (again, assuming that none lived in an EIEC), which is 3 percent of the state’s EIEC population.

Currently, approximately 5.275 million people live in EIECs in Illinois. However, only 15 percent of those individuals (750,000) live outside of the eight county Chicagoland area. Of Illinois’ 102 counties, only 56 currently have any portion of their populations living in EIECs (51 counties outside of Chicagoland).

If one were to divide the state into regions, EIEC population numbers would break down like this (note: these are total population figures, not a segment of the populations based on age):

- Chicagoland (8 counties) – 4.5 million (85.8% of Illinois’ cumulative EIEC population)

- Northern Illinois (16 counties roughly north of Interstate 80, excluding Chicagoland) – 192,000 (3.6%)
- Central Illinois (39 counties roughly between Interstates 80 & 70) – 324,000 (6.2%)
- Metroeastern Illinois (12 counties surrounding St. Louis) – 165,000 (3.1%)
- Southern Illinois (27 counties roughly south of Interstate 70, excluding the Metroeast) – 67,000 (1.3%)

Put another way, more than 52 percent of the population in Chicagoland lives in an EIEC, whereas the average percentage of the population living in EIEC areas in downstate regions is only 17.9 percent, ranging from 12.7 percent (southern Illinois) to 21.6 percent (Metroeast).

The final qualifying factor for EEP status is graduation from a CEJA- or FEJA-established training program. However, these programs are charged with the responsibility of primarily recruiting and training individuals who reside in EIECs, so this segment of the EEP population will not measurably increase the size of the EEP pool.

For the above-referenced reasons, it seems readily apparent that it will soon be difficult to meet EAS goals on renewable energy projects in downstate Illinois with a local workforce. That difficulty will only grow as the statutory EAS goal increases to 30% of the project workforce.

**Therefore, the IPA should take into account the size of the general population as well as the EIEC population of each project area when assessing the accuracy of the EAS and evaluating its success. It should also take these figures into account when determining whether the MES should apply in its entirety to a downstate renewable energy project.**