

TOPIC 10: Proposal to Require the IPA's Equity Portal to Certify Equity Eligible Persons (EEPs) for Compliance with the Minimum Equity Standard (MES)

Background

To verify the EEP status of the minimum number of individuals in their project workforce to satisfy the MES, Approved Vendors and Designees will submit a Year-End Report that includes a list of individual EEP utilized for compliance.

As it currently stands, EEPs can be certified either through registration in the Agency's Energy Equity Portal or by filling out the EEP certification form and submitting it to the Program Administrator. The registration of EEPs via the Energy Equity Portal was a functionality that was created in part because it was requested by stakeholders. The Agency proposes a requirement that all EEPs be certified via the Equity Portal, which would ensure a process that is less administratively burdensome for all parties involved. In addition, certification via the Equity Portal will allow employers to avoid asking sensitive questions of their employees and safeguard employee information from employers.

In this proposed requirement/scenario, employers would direct their qualifying employees to seek certification on the Equity Portal, then the Year-End Report to comply with the MES need only provide a list of the qualifying individuals. In this way, the Program Administrator would be able to verify EEP status for all submitted employees using the data from the Equity Portal.

Questions

1. Are there any unintended consequences that may result from requiring EEPs to use the Equity Portal for certification of their EEP status?

We would want to ensure that the process is confirmed to be secure and easy for the employee to navigate through. Employees should feel that their information is solely being used for this purpose and will not have negative affects to their employment status. This process should also not place an undue burden on the employee by being overly complex or difficult to complete.

2. Do stakeholders see any issue with shifting the reporting work onto the EEPs themselves as opposed to the participating AV or Designee?

We believe that this process should still act in tandem. Approved Vendors should still be working to ensure that their employees have ease of access to the portal itself and assisting with that process in any way possible. This requirement affects the Approved Vendor specifically, so it should not be

presented as being strictly the responsibility of the employee.

3. What is the preferred method for the certification of EEPs for compliance with the Minimum Equity Standard?

Having EEPs certify via the portal is preferable for the AV. It can be difficult for AV's to navigate through collecting the sensitive information that is required to certify someone as Equity Eligible, and we do not want to cross lines or cause discomfort for our employees by needing to fulfill this requirement.

4. Are there potential barriers to access the Equity Portal for qualifying individuals that the Agency should consider?

It can be difficult to guarantee that someone, under the Equity Eligible circumstances, will have access to a usable computer or internet, but as the Approved Vendor we'd be happy to ensure that our employees do have this ability and access. This is where some burden should remain with the Approved Vendor, by requiring their assistance in any instance where an employee may not have this access.