



Updated COVID-19-Related Marketing Guidelines – June 4, 2021

On March 20, 2020, in light of the growing COVID-19 pandemic and its expected impacts in Illinois, the Illinois Power Agency adopted [the following emergency amendment](#) to its Adjustable Block Program and Illinois Solar for All Program Marketing Guidelines:

In-person marketing and solicitation: Given the public health emergency posed by the COVID-19 virus, in-person marketing or solicitation of photovoltaic system sales, installations, or financing; in-person marketing or solicitation of community solar subscriptions; or similar in-person solar marketing or solicitation activity are prohibited.

Clarifications and updates to this prohibition were offered on [May 19, 2020](#); [June 4, 2020](#); [June 30, 2020](#); [August 5, 2020](#); [October 7, 2020](#); and [April 20, 2021](#).

The Agency is encouraged by current public health trends, including the decrease in the statewide COVID-19 positivity rate (the percentage of positive tests across total tests given) to below 2% and the increase in the statewide vaccination rate of Illinoisans ages 16+ to above 60%. In consideration of these trends and Governor Pritzker's announcement that the state will soon move to Phase 5 – which is described as full reopening – the IPA has determined that it is appropriate to update its guidelines in order to allow for door-to-door marketing under solar incentive programs administered by the Agency beginning June 11, 2021, with additional guidelines surrounding these interactions. The Agency stresses that efforts should continue to be made to protect against a recurrent spike in COVID-19 transmission through curbing unnecessary—and especially unwanted—person-to-person contact.

Thus, in the interest of protecting public health, **door-to-door sales will be permitted under the Adjustable Block Program and the Illinois Solar for All Program only where agents remain masked at the initial interaction with customers and practice social distancing in all in-person interactions.** Entities whose agents violate these guidelines may be suspended from program participation.

Any agent engaged in door-to-door marketing or solicitation (other than the distribution of marketing materials without notification, such as distributing door hangers) must wear a mask at the time of the interaction. Agents will be permitted to meet with potential customers at the time of the solicitation without an appointment and may remove their mask so long as the customer expressly agrees. Furthermore, if an agent is invited inside a potential customer's home or business, the agent shall wear their mask unless the customer agrees that it is not required. Whether a sales agent is vaccinated has no bearing on this requirement – masks must be worn unless the customer expressly consents to a maskless interaction. Finally, sales agents shall maintain appropriate social distance from customers at all times during the sales solicitation.

Under previous iterations of the COVID-19 related marketing guidelines, the Agency permitted passive forms of in-person marketing and solicitation, such as tabling at retail stores or public events. Any of these previously-permitted in-person marketing activities may continue in accordance with local guidelines on mask policy and with deference to a potential customer's mask preference. Any door-to-door distribution of marketing materials through passive forms of in-person marketing and solicitation (i.e., distribution of door-hangers without knocking on doors) may also be conducted by agents without masks. In the event that passive door-to-door marketing efforts result in customer interactions, however, the agent will promptly put on a mask unless the customer expressly agrees to remain maskless.



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The Agency will continue to monitor public health information, including vaccination-related information, as part of an ongoing assessment of the propriety of these guidelines. The IPA will endeavor to provide more frequent updates as the public health situation continues to evolve. Additionally, prior-issued guidance regarding best practices remains in effect.

Should you have questions about whether specific practices are permitted, please contact IPA Chief Legal Counsel Brian Granahan at Brian.Granahan@Illinois.gov.