



Inclusiv CCIA Framework

\$1.87 Billion Grant Program for Credit Union Green Lending

Table of Contents

About this Inclusiv CCIA Framework Document.....	2
Part 1: Current CCIA Program Status	2
Part 2: About Inclusiv’s Green Lending Grant Program	2
Part 3: Inclusiv’s CCIA Pre-Qualification Form	2
Part 4: CCIA Program Details, Eligibility Requirements, and Allowable Use of Grants	7
Part 5: Inclusiv’s Seven-Step CCIA Grant Application and Awarding Process.....	10
About Inclusiv	14
Appendix A: Pre-Qualification Data Fields for Inclusiv CCIA Grant Program	15
Appendix B: CCIA Program Detailed Technical Requirements.....	17
Appendix C: How to Identify Low-Income and Disadvantaged Communities (LIDACs)	20



About this Inclusiv CCIA Framework Document

This framework document provides an overview of Inclusiv’s Clean Communities Investment Accelerator (CCIA) grant program, including the details of our grantmaking process, grant guidelines, definitions, and program leverage requirements. As we continue to build our CCIA program, this framework document will be updated regularly with new program details.

Please note, this is a working document. **If you do not see your question answered here, please email CCIASupport@inclusiv.org.**

Part 1: Current CCIA Program Status

CCIA funds were formally obligated to Inclusiv via an award agreement with the U.S. Environmental Protection Agency (EPA) on August 16, 2024. With our award now in hand, Inclusiv, as a CCIA recipient, can begin to provide funding and technical assistance to credit unions (CUs). Inclusiv is moving forward with the delivery of our CCIA program in accordance with the EPA-approved program workplan that is posted here: <https://www.epa.gov/system/files/documents/2024-08/ccia-workplan-inclusiv.pdf>

Part 2: About Inclusiv’s Green Lending Grant Program

Inclusiv has received a \$1.87 billion federal award to provide grants to credit unions to offer green lending programs that serve low-income and disadvantaged communities (LIDACs). The Environmental Protection Agency (EPA) awarded these funds to Inclusiv through the Greenhouse Gas Reduction Fund (GGRF) Clean Communities Investment Accelerator (CCIA).

Through Inclusiv’s CCIA program, 300-400 credit unions will receive grants from Inclusiv over the next three to four years to help grow affordable green lending programs. CUs will be able to apply to Inclusiv for CCIA grants ranging from \$275,000 to \$11 million to cover operating and capitalization costs for their green lending programs, as long as 100% of these funds reach LIDACs. The Inclusiv CCIA program operates through June 30, 2030. Each CU’s CCIA grant term will be a minimum of two-years, but may be longer, and will be determined based on the CU’s grant proposal and lending plan.

Inclusiv’s CCIA grant application and awarding process has seven steps (see Part 5 of this document for more details):



Part 3: Inclusiv’s CCIA Pre-Qualification Form

Inclusiv’s CCIA pre-qualification form is the first step in our grantmaking process. The form is now open, and submissions will be reviewed on a rolling basis until all grant funds have been allocated. Inclusiv will inform credit unions of their pre-qualification status within approximately three months of when they submit a pre-qualification form.



Frequently Asked Questions (FAQs) - Inclusiv Pre-Qualification Process

Is there a specific person we can connect with to discuss questions?

This framework document provides answers to many frequently asked questions. In addition, there is a recording of our **pre-qualification webinar training available here: <https://inclusiv.org/ggrf/>**. If you're not able to find the answers to your questions, the CCIASupport@inclusiv.org email address is the best way to submit your questions to us.

What is the deadline to complete this form?

The pre-qualification form will remain open, and submissions reviewed on a rolling basis until all grant funds have been allocated.

Who can complete the pre-qualification form?

All credit unions and cooperativas (collectively referred to as "credit unions") based in any U.S. state or territory, or serving any Tribal entity, and lending to low-income and disadvantaged communities (LIDACs) may complete a pre-qualification form for Inclusiv's CCIA program.

Is the CCIA program only for Inclusiv members?

No, Inclusiv's CCIA grant program is open to all credit unions and cooperativas in any U.S. state or territory or serving any Tribal entity. You do not need to be an Inclusiv member to apply.

Does my credit union need to have a green lending program to participate?

No, your credit union DOES NOT need to have a green lending program in order to participate. Inclusiv will provide training to credit unions to design their green lending program as part of the grantmaking process.

I'm ready to get started, where do I access the pre-qualification form?

Here is the link to the pre-qualification form: <https://inclusiv.submittable.com/submit>

If you have trouble with the form:

- Please ensure you have scrolled all the way to the bottom of the page on the form website.
- Submittable works best on Google Chrome, Firefox, and Safari. Internet Explorer is not supported. Please make sure you are using a supported browser.
- If there are still issues, clear your cookies/cache and refresh the page. If you try these steps and you are still having trouble, please send a screenshot to CCIASupport@inclusiv.org.

Does it matter who starts the pre-qualification form?

Yes. The person who starts the form should be the person who submits the form. This is also the person who will receive email notifications from Inclusiv about the status of their submission. However, you are able to add collaborators to the form, for other colleagues to review. Here are instructions on how to add collaborators: <https://submittable.help/en/articles/3654810-inviting-collaborators-on-submissions-and-additional-forms>.

How long does it take to complete the form?

The pre-qualification form should take about two hours to complete.



Do I have to complete the form all at once?

No, any questions you answer will be automatically saved so you do not need to fill out the entire form in one sitting - it can be completed in multiple sessions.

Can the saved draft of the pre-qualification form be printed or shared with others?

Yes, you can print the form and share with others at your credit union using your browser's "Print Screen" functionality. You can add collaborators to work on the form together in the Submittable platform, using the instructions from Submittable here: <https://submittable.help/en/articles/3654810-inviting-collaborators-on-submissions-and-additional-forms>.

Will the Net Worth minimum of 7% include the NCUA Allowable CECL inclusion?

Yes, Net Worth minimum of 7% can include the NCUA Allowable CECL inclusion.

Is the Inclusiv-UNH Solar and Green Training required for all applicants?

The UNH-Inclusiv Solar and Green Lending training is required for all CUs that would like to apply for a grant and have not yet had someone from their teams complete the training.

Can you start the pre-qualification process without the training?

Yes, you can fill out the pre-qualification form without having taken the Inclusiv-UNH Solar and Green Lending Training.

When will the courses for Inclusiv-UNH Solar and Green Training begin or dates be available to register? Can I enroll team members in the training? Where do we find application for the UNH-Inclusiv Green Lending Training?

We recommend starting with the pre-qualification form. Once your credit union completes the pre-qualification form, if your credit union prequalifies and has not yet taken a training course, Inclusiv will designate a space in a training course and invite you to register for the course.

When completing the pre-qualification form, what information will I need to provide about my CU?

The pre-qualification form requests information about your credit union in these categories:

- Basic Eligibility Screening
- Background Information
- Existing Lending in Low-Income and Disadvantaged Communities (LIDACs)
- Lending Activity and Systems
- Organizational Capacity
- Existing Green Lending
- Financial Performance

In addition to the information requested in the form, after your form submission, Inclusiv will be evaluating publicly available financial performance information shared in the National Credit Union Administration (NCUA) 5300 Call Reports. Inclusiv will use analysis of your credit union's financial data to determine your credit union's readiness to participate in CCIA. For more information on the publicly available data we will use, along with a summary of all the data fields we request in this pre-qualification form, please see Appendix A below in this CCIA Framework document.



After I submit the form, when do I hear back about whether or not I have pre-qualified?

We anticipate being able to provide an update to credit unions within approximately three months from when they submitted their pre-qualification form. There is a possibility that Inclusiv will reach out to some or all those who have submitted a form to request additional information.

If we don't pre-qualify this time, can we keep trying?

Yes.

Is the pre-qualification form the same as the grant application?

No, the pre-qualification is the first step in the process, it is NOT the grant application.

If I pre-qualify, am I guaranteed a grant?

No, submitting the pre-qualification form and receiving notice that your credit union has pre-qualified DOES NOT guarantee your credit union will receive a CCIA grant. Credit unions that pre-qualify will move to the subsequent steps in this grantmaking process.

What happens after pre-qualification? How does a credit union get access to the full Inclusiv CCIA application?

In order to be invited to apply for an Inclusiv CCIA grant, credit unions must complete the pre-qualification form and be informed by Inclusiv that they pre-qualified. The CU will then be invited to an application round and have two weeks to complete their grant application. If the timing doesn't work for the CU they can participate in future application rounds. These application rounds will take place until all grant money has been allocated.

What else do I need to know?

- In order to receive a CCIA grant, participating credit unions must commit to delivering 100% of their CCIA lending to low-income and disadvantaged communities (LIDACs) to finance CCIA-eligible clean energy projects for homes, businesses, and transportation.
- Credit unions receiving an Inclusiv CCIA grant will be required to leverage their grant dollars between 2 and 6 times by deploying additional dollars of their own capital for every CCIA dollar deployed. (learn more about this in Appendix B of this framework document)
- To meet this program's wide mandate, Inclusiv aims to provide grants to credit unions based in U.S. states or territories, or serving Tribal entities, that lend to a diverse range of people and community groups across all ten EPA regions.
- Federal CCIA terms mandate all CU that receive CCIA grants meet compliance requirements, which may include a Single Audit (formerly known as A-133) and other federal reporting requirements.

FAQs - Inclusiv Pre-Qualification Form Questions

Section 1 – Background Information

How does having an employee on Inclusiv's board, or Inclusiv having an employee on a CU's board, impact my CU's pre-qualification status?

An applicant having an employee on the Inclusiv board has no impact (negative or positive) on the



applicant's ability to prequalify. This question is intended to gather information for our records in accordance with our conflict of interest disclosure policy.

Section 2 – Existing Lending in Low Income and Disadvantaged Communities

Are we selecting states that are in our field of membership only? (We have members that have moved to other states, outside of our field of membership, after meeting our original field of membership.)

Please only include your credit union's field of membership.

We lend nationally - should we select every state we lend in within the pre-qualification form?

Please select the states/counties where most of your actual lending activity happens. If your credit union is truly lending in all 50 states, please select National.

Section 3 – Lending Activity and Systems

Can you define Micro Enterprise and Member Business loans?

We define "micro enterprise" as businesses requiring loans under \$50,000 and "member business" as small business loans over \$50,000.

For the loan table in section 3, should we list the maximum loan amount per member, or the maximum amount for our credit union?

We are referring to the maximum loan amount per member in each category here. Our intention with this question is to get a sense of the types/sizes of green loans that would be feasible for your credit union to offer.

How do I complete the table in section 3 asking for maximum loan amounts if our policy does not specify an amount (i.e. our policy specifies concentrations?)

For the Section 3: Maximum Loan Amounts question, if you are able to provide approximations, that would be helpful.

Our intention with this question is to get a sense of the types/sizes of green loans that would be feasible for your green union to offer. For example, solar loans typically require unsecured loans (or UCC-1 secured loans) between \$25,000 - 100,000. But unsecured energy efficient small appliance loans could range from ~\$500 - ~5,000. Both of these loan types are important parts of our CCIA program, and we know that some credit unions will be comfortable offering larger loans for solar projects, while some will prefer to limit their unsecured loans to smaller projects, such as energy efficient appliances.

There is no right or wrong answer here. Since we will need a diversity of lenders and loan products across the country, we are asking this question to better understand which lending category each credit union would be likely to fall in.

Should credit unions use the loan amounts from the most recent NCUA Call Report to complete the loan information requested on the Pre-Qualification Form?

The maximum loan amount question in the pre-qualification form is asking about what is in your loan policies as the maximum allowable loan amount.



Section 4 – Organizational Capacity

What do you answer for years of service if the person currently in the position will retire before the rollout?

Please enter the tenure of the person in the CEO/CFO/CLO/Board chair role at the time you are filling out the pre-qualification form. If you know or anticipate your CEO/CLO/CFO/Board chair retiring or transitioning out of the role, please add specifics of what person or position is retiring in the "Other" section of material events.

Regarding the Loan Origination System (LOS), we use our core system for our LOS, not a third party. Does it matter for the purposes of this question whether we use a third-party LOS or not?

This LOS question is not limited to third party providers. We are interested in whether a CU uses an LOS at all (including those that use their core system for their LOS).

We outsource our CFO role, so this person is not on our payroll. Do I answer this with "0", do I answer how long she has filled this role for us, or do I need to know how long she has been in her current position?

Please mark "0" for this question.

Regarding counseling through a third party - we have a referral relationship with a third-party counseling provider - is that what you mean?

If your credit union has a relationship with a third-party financial counseling provider whereby your referred credit union members can obtain financial counseling services from that third-party, yes.

Please provide additional details related to Leveraging.

Credit unions receiving an Inclusiv CCIA grant will be required to leverage their grant dollars between 2 and 6 times by deploying additional dollars of their own capital for every CCIA dollar deployed. (learn more about this in Appendix B of this framework document)

Section 5 – Existing Green Lending

Since we don't have a Green Lending program, we don't have any separate policy regarding green lending. However, we have a loan policy, and we do finance Electric Vehicles. Would it make sense to check the box for the EV Loan even though it's part of our normal Auto Loan?

Yes, please do check the box for the EV loan since you do have a vehicle lending policy that allows you to do EV lending.

We re-classified loans done previously as green loans, but have not booked any new loans under the green product. How should we answer the question asking if we have done green lending?

If your credit union has originated any loans currently classified as green loans, even if they were not originally under a green lending "program", you may count that as originating green.

Part 4: CCIA Program Details, Eligibility Requirements, and Allowable Use of Grants

This section provides additional details on applicant eligibility requirements and grant fund usage.

All credit unions are eligible to apply



- All credit unions based in any U.S. state or territory, or serving any Tribal entity, and that lend to LIDACs are eligible to apply for Inclusiv's CCIA green lending grants.
- This includes but is not limited to credit unions based in U.S. territories (such as cooperativas in Puerto Rico), Community Development Financial Institutions (CDFIs), Minority Depository Institutions (MDIs), and low-income designated credit unions (LIDs).
- However, CDFI, MDI, or LID designation is NOT required. And credit unions do NOT have to be Inclusiv members to apply.

CCIA grant funds cover operating and capitalization costs

If selected, CUs will support new or existing green lending programs with two types of grant funds:

- CU Operating Grants can cover staff salaries, software, marketing, and other expenses; and
- Green Lending Capitalization Grants can be used to lower the costs of green loans made to LIDACs for eligible projects. For example, a credit union could use grant funds for below market interest loans, loan loss reserve funds, loan guarantees, partially forgivable loans, interest-rate buy-downs, lines of credit, and/or subordinated debt.
- 100% of any CCIA grant funds received must be used to support work in low-income and disadvantaged communities (LIDACs).

Credit unions can offer familiar loan products using CCIA grant funds

- Credit unions already offer loan products that could be adapted to fund CCIA-eligible projects.
- These include unsecured consumer loans, secured vehicle loans, chattel-secured "UCC-1s", home equity lines of credit or loans, home improvement loans, and appliance loans.
- With Inclusiv's CCIA grants, credit unions can offer the types of loan products that they know best as long as they are used for CCIA-eligible projects.
- For example, if a credit union is experienced in unsecured consumer lending, then we encourage that credit union to offer unsecured consumer loans for green projects, such as energy efficient appliances or solar panel installation.

There are a wide range of CCIA-eligible projects

CCIA-eligible projects will help low-income and disadvantaged community (LIDAC) consumers, homeowners, and small businesses to reduce energy bills, air pollution, and greenhouse gas emissions. Eligible project types can include, but are not limited to: efficient heating and cooling systems; efficient appliances; electric vehicles; electric vehicle charging stations; and solar systems.

FAQs - Funding and Resourcing

The timeline indicates this grant would require 1 full-time employee. We would like to gain a better understanding of 'why'.

This grant program will require a dedicated staff member to build and grow a CCIA green loan program at the credit union, ensure that all the credit union's staff have full information to operate the program, serve as the main point person between the credit union and Inclusiv, and manage all reporting and compliance requirements that the credit union will provide to Inclusiv. We anticipate this will be a full-time job (or 2 part-time jobs). If a credit union is awarded a CCIA grant, the credit union will be able to use grant dollars to cover the costs of this staff member (or staff members).



If we were approved and we are in the onboarding process, would we be able to hire someone with grant funding to manage that process and the ongoing maintenance?

Yes, if you prequalify, apply for a grant, and are approved for the grant, you will be able to use the grant to hire someone to manage onboarding and other steps.

What are the administrative costs for the credit union application/pre-qualification process up until the time we would receive the grant for operational costs?

These costs will primarily be for your CU's staff salary and benefits. We will have grant funds available for smaller credit unions to offset these upfront admin costs during the application stage.

Will you be providing a projected funding amount after the pre-qualification?

Each credit union who is invited to apply for a CCIA grant will work with Inclusiv to determine the right funding amount. This will be part of the grant application process.

What is the maximum potential grant allowable per credit union?

\$11 million (\$10 million to be used for lending capital / \$1 million for operating costs).

What is the definition of "reserves"?

For CCIA "reserves" are generally defined broadly as the credit union's net worth, it's not the loan loss reserve account.

90% of funding must be specifically for LIDACs loans – would this have to be direct funding to the member through products or can it be placed in loan loss reserves?

Yes, 90% of CCIA grant dollars that a CU receives must be used for capitalization funding and this can include both direct financing to members through products OR a loan-loss reserve. However, 100% of this funding must serve LIDACs.

If we have never had a formal green lending program before how will we be able to determine what we may be able to lend to request grant funding?

For credit unions that pre-qualify and do not have a formal green lending program or have any staff that have attended any of the Inclusiv-UNH green lending courses, that credit union will be offered our Solar and Green Lending Training course. In that course as well as the CCIA grant application support offered after the course, we'll help each credit union to determine their CCIA green lending plan and how to estimate their CCIA loan volume.

If awarded the grant, will it be awarded all at once or over a period of time?

If awarded a grant, the grant will be disbursed over time based on a disbursement schedule agreed upon between Inclusiv and the credit union during the contracting process.

Will the Single Audit (formerly known as the A-133) be a requirement based upon the amount of the grant (like CDFI grants) or is there a different standard? And how often will you require the audit over the term of the grant?

The single audit requirement is based on the amount of the grant. Currently any credit union that expends \$1,000,000 or more in Federal awards during the credit union's fiscal year must have a single



audit (A-133) conducted. This is an annual requirement for each year the credit union expends \$1 million or more in federal funds (we believe this means if a credit union expends \$500k from CCIA and \$500k from CDFI, then that would trigger a single audit requirement for the credit union in that credit union’s fiscal year).

Part 5: Inclusiv’s Seven-Step CCIA Grant Application and Awarding Process

Inclusiv’s CCIA grant application and awarding process has seven steps.



Step 1: Credit Union Pre-Qualification Form

Interested credit unions will fill out a short pre-qualification form, which will assess the credit union based on factors such as asset size, lending expertise in Low-Income and Disadvantaged Communities (LIDACs), readiness to deploy capital for green loans, ability to leverage grant funds with deposits or other private capital, and alignment with overall CCIA program requirements.

This pre-qualification form is open and can be found here: <https://inclusiv.org/ggrf>

pre-qualification decisions will be provided on a rolling basis and credit unions that pre-qualify will be invited to move to Step 2.

Step 2: Credit Union Green Lending Training*

All credit unions that pre-qualify for Inclusiv’s CCIA program (details above) and have not yet taken one of our training courses, will be invited to the UNH-Inclusiv Solar and Green Lending Training and Technical Assistance program. These courses are entirely virtual and remote (using Zoom and UNH’s online learning management software platform). Inclusiv will provide the timing and schedule for the training course (and hold a spot in the training course) for each credit union that pre-qualifies and has not yet taken the training.

**If you already applied for our UNH-Inclusiv trainings and haven’t heard back, don’t worry. We have a waiting list with all those who have applied to our training courses and have not yet been placed in a course and will reach out when our class schedule is finalized.*

Step 3: Credit Union Develops & Submits Application

Once a credit union completes a training course, they will be invited to complete the full CCIA application. Inclusiv will support credit unions every step of the way in developing their grant applications.



FAQs – Inclusiv CCIA Grant Application

If we don't receive the grant after the first time applying, will there be other opportunities to apply in the future (can we apply again), and will Inclusiv team be there to help guide us on how to improve our application?

This will be determined on a case-by-case basis and will depend on the reason why the credit union did not receive the grant initially, along with steps the credit union has taken to make changes that would better position the CU to be able to successfully deploy the grant.

All of the loan examples listed are specifically for individuals (i.e. members). Are commercial and/or small business loans also eligible for CCIA funding?

Eligible CCIA loans can be to individuals, small businesses, community groups, or other entities if those entities serve LIDACs and can provide required documentation to illustrate LIDAC service.

Could funding go towards publicly available charging stations?

These projects can go to fund a charging station as well as other commercial projects where the end-users might not be known. It just needs to be in a community that is designated as a LIDAC and ALL CCIA eligibility requirements must be met (see Appendix B below in this CCIA Framework document for the short list of eligibility requirements).

Step 4: Application Review

An independent review committee will review all grant applications quarterly. *Applicants can expect to hear back approximately 4-8 weeks after each application deadline.*

Step 5: Grant Award Decision & Contracting

Credit unions that are selected for grants will work closely with Inclusiv legal staff on the contracting process and fund disbursement schedule. The grant amount each individual credit union receives will be based on factors such as expertise in lending to LIDACs, asset size, lending capacity, and the size of the green lending program the credit union would like to build. *This step is expected to take one month to complete.*

Step 6: Credit Union CCIA Onboarding Process

After signing a contract, each CU will be placed into a cohort of credit union grantees for an Inclusiv-led onboarding. The onboarding will provide detailed information and operational support on how to implement the CCIA program. This will include CCIA reporting and compliance training.

Credit unions that participate in Inclusiv's CCIA program will have to meet compliance and reporting requirements, including the deployment of loans for eligible purposes in LIDACs. Inclusiv will provide participating credit unions with step-by-step guidance and a clear process for the compliance and reporting requirements.

Inclusiv already has a technology platform – FIDAP (Financial Inclusion Data Analytics Platform) that will help CUs manage, track, and report on LIDAC green lending. FIDAP currently supports CDFI reporting for 200 credit unions and will have additional functionality added to meet the EPA's federal grant program requirements for CCIA.



CUs should expect to devote a full-time staff person to this onboarding process for four weeks.

Step 7: Credit Union Runs CCIA Green Lending Program

Over the life of their grant, Inclusiv staff will provide ongoing, one-on-one support to each credit union as they launch and operate their CCIA green lending program.

FAQs – Inclusiv CCIA Program

It was mentioned on the webinar that consultants are not allowed to be paid to assist with reporting and management/oversight of the program using grant funds. Is there a concern if the credit union uses a consultant to assist with day-to-day operations using credit union funds?

A credit union may hire a consultant for any part of their program, including reporting and management/oversight, in accordance with allowable use of the grant funds per government compliance rules. That said, one important goal of Inclusiv's program is to build a network of credit unions across the country that have in-house green lending expertise. For that reason, we do strongly request that credit unions that receive CCIA grants use part of those funds to hire or designate at least one staff member (not a consultant) who will be the CCIA point of contact for the CU.

In addition, Inclusiv will be providing many tools and resources at no cost to the credit unions that receive CCIA grants. Before hiring consultants, we recommend that credit unions wait to understand the details of the program and the details of what tools and resources we will be providing so that the credit union does not invest in anything that we are offering at no charge to the credit union.

If the credit union is unable to deploy the full amount of the grant, will the credit union give back just the undeployed portion or the entire grant?

Just the undeployed portion - however, our current plan is to disburse funds in tranches so that a credit union will reach interim CCIA lending goals before receiving subsequent tranches of funds - ideally this will mean that undeployed portions are minimized. Most importantly, if a credit union is not deploying funds as planned, we will have a team to support the CU to help understand and hopefully resolve barriers that may be slowing the credit union's CCIA lending.

Would there be any marketing material creation help?

If your credit union is awarded funding, there will be support from Inclusiv that will include marketing material development. In addition, CUs can use a portion of their grant funds to hire a marketing expert (consultant or staff member) to support its marketing efforts.

FAQs – Inclusiv CCIA Reporting and Compliance Requirements

Did I understand correctly that there is a 6-year reporting period?

Reporting requirements include both impact of grant and transaction level loan reporting. While Inclusiv's CCIA program is currently scheduled to run through June 30, 2030, each credit union will have a different reporting period based on when they receive a grant. For example, if they receive a grant in year 3 of Inclusiv's CCIA program, they may not have a full 6-year reporting period. In addition to regular reporting that's required by the federal government while each credit union's CCIA grant is



active, there may be some reporting requirements that are due after the end of the period of performance. After completing a grant application and getting approved for a grant, the reporting requirements for each CU will be specified at the time that each CU receives a grant from Inclusiv.

How many years of compliance reports are expected on awarded grants?

CUs that receive a grant will provide compliance reports during each year they are working on the grant deliverables. For example, if your CU plans to deploy all the grant funds in the form of CCIA loans over a 3-year period, you will provide compliance reports over those 3 years. In addition, there will be a requirement to provide compliance reports when you're closing out your grant.

Will reporting be annual like CDFI grants? Or quarterly like ECIP?

Based on our current understanding from the EPA, there would be a report due once a quarter. This breaks down ANNUALLY as follows (and this is subject to change):

- Due Jan 31 (covers Jul 1 - Dec 31) = Program Reports + Budget
- Due Apr 30 (covers Oct 1 - Mar 31) = Loan Transaction Reports
 - Inclusiv FIDAP system available to streamline
- Due July 30 (covers Jan 1 - Jun 30) = Program Reports + Budget
- Due Oct 30 (covers Apr 1 - Sep 30) = Loan Transaction Reports
 - Inclusiv FIDAP system available to streamline

What documentation or control is required to prove low to moderate income and that it's being used to support our green initiative?

Inclusiv has a software platform called Financial Inclusion and Data Analytics Platform (FIDAP) that CUs receiving CCIA grants will use to track their progress on lending in low-income and disadvantaged communities or "LIDACs" (NOTE- this is not the same as low to moderate income). We have used this tool to help hundreds of credit unions with their CDFI certification and reporting and are expanding it for CCIA LIDAC tracking and reporting. We will provide this tool to all CUs that receive CCIA grants and will provide training and support with onboarding the CU in how to use this and how to build into its lending operations.

It's also important to note that each type of CCIA green loan will require different types of documentation. During the application stage and during the onboarding stage, we will work with each CU to determine what type of loans they want to provide and then make sure they understand the type of documentation needed. For example, when providing a loan for a rooftop solar system on a single-family home, the certificate of (construction) completion from the contractor/installer would be collected by the credit union.

Within the reporting, we can identify low-income based upon the income on their application. What database do you require we use to determine disadvantaged communities?

Credit unions will not have to figure this out on their own - Inclusiv already has a technology platform – FIDAP (Financial Inclusion Data Analytics Platform) that will help credit unions manage, track, and report on LIDAC green lending. FIDAP currently supports CDFI reporting for 200 credit unions and will have additional functionality added to meet the EPA's federal grant program requirements for CCIA. The federal government instructions for how to identify Low-Income and Disadvantaged Communities (LIDACs) are available in Appendix C on this document.



Is the FIDAP available at this time?

Yes, FIDAP is available - to learn more, please visit the following link: <https://inclusiv.org/fidap-is-live/>

Is the FIDAP going to help us identify LIDAC?

Yes, FIDAP will help identify lending in low-income and disadvantaged communities (LIDACs) for grantee credit unions in 2025. This functionality is not available in the current FIDAP platform.

About Inclusiv

Inclusiv is a certified CDFI intermediary that transforms local progress into lasting national change. We provide capital, make connections, build capacity, develop innovative products and services and advocate for our member community development credit unions (CDCUs). Inclusiv has over 500-member CDCUs that serve nearly 22 million residents of low-income urban, rural and reservation-based communities across the US and hold over \$316 billion in community-controlled assets. Founded in 1974, Inclusiv is headquartered in New York, NY, with offices in Madison, WI, Atlanta, GA, and San Juan, PR.

About Inclusiv's Center for Resiliency and Clean Energy

Inclusiv launched its Center for Resiliency and Clean Energy in 2019, working to make clean energy affordable and accessible for all people and communities. In 2020, Inclusiv teamed up with the University of New Hampshire's Carsey School of Public Policy, with support from the U.S. Department of Energy, to design the nation's first solar and green lending training and technical assistance program for credit unions and other community-based lenders. To date, Inclusiv and UNH have trained close to 400 community-based lending institutions in how to build and grow affordable and accessible green loan programs. In 2024, the Environmental Protection Agency (EPA) awarded Inclusiv a \$1.87 billion grant from the Greenhouse Gas Reduction Fund's (GGRF's) Clean Communities Investment Accelerator (CCIA) program to support credit union green lending programs.



Appendix A: Pre-Qualification Data Fields for Inclusiv CCIA Grant Program

Inclusiv is asking all credit unions interested in our Clean Communities Investment Accelerator (CCIA) green lending grant opportunity to complete a pre-qualification form as a first step in the grant process. Inclusiv will consider data submitted in the pre-qualification form, as well as publicly available National Credit Union Administration (NCUA) 5300 Call Report data and the NCUA Credit Union Profile Form. *This appendix provides information on the data points used to understand whether a financial institution pre-qualifies for Inclusiv’s CCIA program.*

Baseline Eligibility Screening

To be eligible for this program, applicants must meet the following eight minimum qualifications:

1. Be a Credit Union or Cooperativa
2. Be headquartered and lend in the United States (including U.S. territories or serving any Tribal entities)
3. Has authorization from head of credit union to fill out the pre-qualification form
4. Is willing and able to commit to having a designated CCIA primary point of contact at the financial institution
5. Has net-worth ratio of 7% or above
6. Commits to requirement of 100% of CCIA lending serving low-income and disadvantaged communities (LIDACs), if selected to receive a CCIA grant
7. Acknowledges understanding that EPA requires Inclusiv, as part of CCIA compliance reporting, to collect loan transaction data from and conduct periodic reviews of each credit union’s supporting documentation for all credit unions selected for CCIA grants

Additional Data Fields

Inclusiv also uses information in the following data fields to evaluate CUs during the pre-qualification stage.

I. Background Information

Credit union name
Charter number
Whether any employee or board member of credit union is a past or present member of the Inclusiv Board of Directors
Name, title, and contact information for primary contact person
City and state of credit union headquarters
Field of membership

II. Existing Lending in Low-Income and Disadvantaged Communities (LIDACs)

Category	Data Field
Existing Lending in LIDACs	State, territory, and counties where credit union lends
Existing Lending in LIDACs	CU holds designation that may indicate CU already serves LIDACs (Community Development Financial Institution, Minority Depository Institution, Low-Income Designation, Multiple common bond with underserved community in charter)
Existing Lending in LIDACs	Open response – how credit union is accountable to and serves low-income and disadvantaged communities (LIDACs)

III. Lending Activity and Systems

Lending Activity and Systems	Maximum loan amounts available at credit union for various loan types: unsecured consumer, vehicle, micro enterprise, member business, home mortgage and home equity and lines of credit
Lending Activity and Systems	Usage of Loan Origination System at credit union for various loan types: unsecured consumer, vehicle, micro enterprise, member business, home mortgage and home equity and lines of credit
Lending Activity	Usage of automated underwriting at credit union for various loan types: unsecured consumer,



and Systems	vehicle, micro enterprise, member business, home mortgage and home equity and lines of credit
Lending Activity and Systems	Existence of digital storing system for supporting documentation (such as vendor quotes, invoices, and letters of project completion)

IV. Organizational Capacity

Org. Capacity	A-133 Single Audit experience
Org. Capacity	Experience reporting under federal departments or programs, experience with transaction level reporting under federal departments or programs
Org. Capacity	Number of full-time staff members
Org. Capacity	Number of part-time staff members
Org. Capacity	Number of volunteer staff members
Org. Capacity	Number of lending staff members
Org. Capacity	Tenure of Chief Executive Officer (CEO)
Org. Capacity	Tenure of Chief Financial Officer (CFO)
Org. Capacity	Tenure of Chief Lending Officer (CLO)
Org. Capacity	Tenure of Board Chair
Org. Capacity	Existence of 3 rd party financial counseling at credit union
Org. Capacity	Existence of certified financial counselor on staff at credit union
Org. Capacity	Existence of Interest Rate Risk Model
Org. Capacity	Existence of Internal Loan Concentration Limits
Org. Capacity	Existence of Board-approved plans and policies (lending policies, strategic plan, succession plan, asset liability management policy, liquidity policy, collections policy)
Org. Capacity	Acknowledgement of CCIA leverage requirement
Org. Capacity	Anticipated material adverse events at credit union

V. Existing Green Lending

Existing Green Lending	Existence of active green lending program
Existing Green Lending	Age of active green lending program
Existing Green Lending	Origination of green loans
Existing Green Lending	Approximate green loan origination volume to date in 2024
Existing Green Lending	Current staff who are graduates of UNH-Inclusiv Solar and Green Lending Training
Existing Green Lending	Commitment at least one staff taking UNH-Inclusiv Solar and Green Lending Training
Existing Green Lending	Preferred timing for taking UNH-Solar and Green Lending Training
Existing Green Lending	Credit union leadership has spoken to board of directors about green lending program
Existing Green Lending	Strategic plan inclusion of a green lending strategy
Existing Green Lending	Existence of green loan policy at financial institution

VI. Financial Performance

Inclusiv will be reviewing publicly available financial performance information shared in the National Credit Union Administration (NCUA) 5300 Call Reports. Inclusiv will use analysis of your credit union's financial data to determine your credit union's readiness to participate in CCIA. Financial performance data reviewed will include but is not limited to net worth ratio, deployment, delinquency, net charge offs, return on assets, operating expenses/efficiencies, and net operating income.



Appendix B: CCIA Program Detailed Technical Requirements

Leverage requirements for credit unions receiving CCIA grants

Credit unions receiving an Inclusiv CCIA capitalization grant will be required to leverage their grant dollars between 2 and 6 times by deploying additional dollars of their own capital for every CCIA dollar deployed. Please note, the 10% administrative portion of the grant (also known as Technical Assistance Subaward or operations grant) is not included in this leverage requirement.

Each CU that pre-qualifies and enters the application stage will receive support from Inclusiv to help determine the leverage target that the CU believes it will be able to achieve over the entire program period of performance. This determination will be based on the size of the CU, its ability to bring in outside capital, and its ability and track record lending to LIDACs.

Each CU will have from the time they receive a CCIA grant until June 30,2030 to achieve its leverage requirement.

Most credit unions that receive a CCIA grant will be expected to leverage it three times. This means for every dollar in grants a credit union receives, it will commit to lend at least two times that amount during the performance period, in addition to lending the amount of grant dollars received. 100% of the grant and leverage must be lent in low-income and disadvantaged communities (LIDACs).

For example, if your credit union receives a \$100,000 CCIA Capitalization grant, based on the requirement to leverage this grant by three times, your credit union would need to commit to lending a total of \$300,000 during the performance period. This means:

- CCIA Grant Amount: \$100,000
- Leverage Requirement: 3 times the grant amount
- Total Lending Commitment: \$100,000 (grant) + \$200,000 (additional dollars, such as deposits) = \$300,000
- Additionally, all \$300,000 must be lent within LIDACs (Low-Income Designated Areas and Communities).

What are the requirements for CCIA-eligible projects?

A project, activity, or technology eligible for CCIA grant support must meet ALL OF the following requirements:

- 100% of funds must go to Low-Income and Disadvantaged Communities (LIDACs)
- Must be in one of these categories:
 - Distributed Energy Generation and Storage (such as solar systems and solar plus battery storage systems)
 - Net-Zero Emissions Buildings (such as efficient heating and cooling system or appliance upgrades)
 - Zero-Emissions Transportation (such as electric vehicles and electric vehicle charging stations)
- Must meet all of these six additional requirements:
 - Reduces or avoids greenhouse gas emissions
 - Reduces or avoids emissions of other air pollutants
 - Delivers additional benefits within one or more of the following seven categories:
 - Climate change
 - Clean energy and energy efficiency
 - Clean transportation
 - Affordable and sustainable housing
 - Training and workforce development
 - Remediation and reduction of legacy pollution
 - Development of critical clean water infrastructure
 - Would not otherwise have been financed
 - Will mobilize private capital
 - Will support only existing commercial technologies that have been deployed for commercial purposes at



least three times or a period of at least five years in the United States for the same general purpose as the project, activity, or technology.

What are some examples of CCIA-eligible green project categories?

- Home Energy Improvements
- Efficient Appliance Purchases
- Efficient Heating and Cooling Systems
- Solar (+ Battery Storage) Systems
- Electric Vehicles (EVs)
- Many more

How can green lending capitalization grant funds be used to lower the cost of loans for CCIA-eligible projects?

90% of CCIA grant dollars that a CU receives must be used for capitalization funding. They can use these capitalization funds in many ways, including, but not limited to:

- Credit enhancements
 - loan guarantees
 - loan guarantee funds (whether full or partial)
 - loan loss reserves
 - other credit enhancement instruments
- Debt
 - Loans (secured or unsecured)*
 - unsecured consumer loans
 - secured vehicle loans
 - chattel-secured "UCC-1"
 - home equity line of credit or loan
 - home improvement loans
 - appliance loans
 - Forgivable / partially forgivable loans
 - Zero-interest and below-market interest loans
 - Loans paired with interest rate buydowns
 - Lines of credit
 - Subordinated debt
 - Warehouse lending
 - Loan purchasing programs
 - Other debt instruments
- Equity investments
 - equity project finance investments
 - private equity investments
 - other equity instruments
- Hybrids
 - mezzanine debt
 - preferred equity
 - other hybrid instruments

**Note: While subsidized loans and partially forgivable (and even forgivable) loans are allowed, CCIA grant dollars cannot be used to provide grants directly to borrowers.*

What types of operating costs will CCIA grant dollars support?

10% of CCIA grant dollars that a CU receives can be used for operating costs that support capacity building for green loan program operations. EPA calls these grants "Technical Assistance Subawards" and they are only



available for lenders selected for capitalization funding grants.

- Hiring staff
- Developing new financial products
- Supporting predevelopment activities
- Site and building assessments (e.g., energy audits)
- Financial/ technological feasibility studies
- Other activities
- **Procuring:**
 - Training
 - Market Analysis
 - Technical Support
 - Software
 - Other

What are some additional limitations on the use of CCIA funds?

- CCIA grant dollars typically cannot be used to support emergency or disaster relief loans that do not meet all of the above requirements for CCIA-eligible projects. For example, grant funds cannot be used to help people grocery shop or afford a few nights in a hotel.
- Credit unions cannot use these grants to update their own headquarters or branches, the funds must be used to build or operate their green lending programs and to provide loans to their members.
- In most situations, CCIA grants must fund loans for new projects, credit unions cannot use CCIA grant dollars to purchase participations in green or solar loans for projects that were already able to obtain financing without CCIA grant dollars.



Appendix C: How to Identify Low-Income and Disadvantaged Communities (LIDACs)

One hundred percent of CCIA grant funding awarded to a credit union must go to Low-Income and Disadvantaged Communities (LIDACs). Inclusiv already has a technology platform – FIDAP (Financial Inclusion Data Analytics Platform) that will help CUs manage, track, and report on LIDAC green lending. FIDAP currently supports CDFI reporting for 200 credit unions and will have additional functionality added to meet the EPA’s federal grant program requirements for CCIA. The federal government has outlined four ways to identify Low-Income and Disadvantaged Communities (LIDACs):

- **CEJST-Identified Disadvantaged Communities:** Census tracts identified as “disadvantaged” through version 1.0 of the Climate & Economic Justice Screening Tool (CEJST), released 11.22.22, which includes census tracts that meet the thresholds for at least one of the tool’s categories of burden and land within the boundaries of Federally Recognized Tribes. See CEJST “disadvantaged” census tracts here: <https://screeningtool.geoplatform.gov/en/>
- **EJ Screen-Identified Disadvantaged Communities:** All version 2.2 of EJ Screen communities within either:
 - limited supplemental set of census block groups that are at or above the 90th percentile for any of EJ Screen’s supplemental indexes when compared to the nation or state; or
 - geographic areas within Tribal lands as included in EJ Screen, which includes the following Tribal lands: Alaska Native Allotments, Alaska Native Villages, American Indian Reservations, American Indian Off-reservation Trust Lands, and Oklahoma Tribal Statistical Areas.
- **Geographically Dispersed Low-Income Households:** Low-income individuals and households living in Metropolitan Areas with incomes not more than 80% AMI or 200% Federal Poverty Level (FPL) (whichever is higher), and low-income individuals and households living in Non-Metropolitan Areas with incomes not more than 80% AMI, 200% FPL, or 80% Statewide Non-Metropolitan Area AMI (whichever is highest).
 - FPL uses latest publicly available figures from the U.S. Department of Health and Human Services.
 - Area Median Income (AMI) is defined using the latest publicly available figures from the U.S. Department of Housing and Urban Development (HUD).
 - Metropolitan Area and Non-Metropolitan Area are defined using the latest publicly available figures for county-level designations from the Office of Management and Budget.
 - Statewide Non-Metropolitan Area AMI is defined using the latest publicly available figures from the U.S. Department of the Treasury’s CDFI Fund, with an adjustment for household size using HUD’s Family Size Adjustment factor.
- **Properties Providing Affordable Housing:** Fall within either of the following two categories:
 - multifamily housing with rents not exceeding 30% of 80% AMI for at least half of residential units and with an active affordability covenant from one of the following federal or state housing assistance programs: (1) Low-Income Housing Tax Credit; (2) a housing assistance program administered by HUD, including Public Housing, Section 8 Project-Based Rental Assistance, Section 202 Housing for the Elderly, Section 811 Housing for Disabled, Housing Trust Fund, Home Investment Partnership Program Affordable Rental and Homeowner Units, Permanent Supportive Housing, and other programs focused on ending homelessness that are funded under HUD’s Continuum of Care Program; (3) a housing assistance program administered by USDA under Title V of the Housing Act of 1949, including under Sections 514 and 515; or (4) a housing assistance program administered by a tribally designated housing entity, as defined in Section 4(22) of the Native American Housing Assistance and Self-Determination Act of 1996 (25 USC § 4103(22)), or
 - naturally-occurring (unsubsidized) affordable housing with rents not exceeding 30% of 80% AMI for at least half of residential units



- *Federally Recognized Tribal Entities*: All Federally Recognized Tribal entities, which are considered disadvantaged regardless of whether a Federally Recognized Tribe has land. A “Federally Recognized Tribal Entity” means
 - any individual member of a Federally Recognized Tribe;
 - any for-profit business that has at least 51 percent of its equity ownership (or the equivalent in limited liability companies) by members of Federally Recognized Tribes;
 - any non-profit entity with at least 51 percent of its Board of Directors (i.e., Governing Board) comprised of members of Federally Recognized Tribes; or
 - any Federally Recognized Tribal government entity.

Under this definition, any Federally Recognized Tribal Entity is included within the definition of Low-Income and Disadvantaged Communities, regardless of where that entity is located (i.e., the entity may be located in areas outside of the CEJST land area dataset, including but not limited to tribal service areas or counties).