



**Background on the Clean Communities Investment Accelerator Program**

U.S. House of Representatives Committee on Energy and Commerce

Subcommittee on Oversight and Investigations

"Examining the Biden Administration's Energy and Environment Spending Push"

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Every day, Americans experience economic challenges, from housing and transportation costs to energy bills and grocery expenses. President Trump ran on the promise of helping consumers afford the cost of living.

Clean energy lending is a key to unlocking sustainable economic prosperity for America. By providing affordable clean energy financing for businesses, homeowners and communities, community-based lenders can help consumers and small business owners save money on energy bills, improve health outcomes through better air quality, and foster economic growth by financing projects that employ American workers.

In 2022, Congress did its part. It passed the Inflation Reduction Act that included key programs like the Clean Communities Investment Accelerator (CCIA) that today is consistent with this Administration's ambitions.

The CCIA is a bipartisan commitment to our Nation's communities. The financial burden of powering our lives has become unaffordable for many. President Trump made a promise to the American consumers to make life better.

The CCIA makes clean energy lending accessible and affordable through community banks, credit unions, and other community-based lenders, ensuring that all Americans have the opportunity to invest in clean energy technologies that reduce their energy costs and improve the comfort of their homes and businesses. The CCIA will ensure that these vital clean energy investments reach the communities that need them most, including low-income areas and many small towns and rural areas that are underserved by mainstream financial institutions.

Inclusiv, as a CCIA award recipient, has a 50-year track record of working with credit unions, which are regulated, member-owned and governed financial institutions that have successfully served Americans of modest means for more than a century, and our movement has a strong track record of serving as financial first responders in partnership with the federal government, including the first Trump administration. Our organization and the credit union movement are well-prepared to be effective, vigilant stewards of this vital federal investment in low-income communities and are pleased to share with the Oversight and Investigations Subcommittee the following background about Inclusiv and CCIA.

### **Inclusiv Background**

Inclusiv is a national non-profit organization and US Treasury certified community development financial institution (CDFI) dedicated to promoting financial inclusion in low-income and underserved communities across the United States. Through our network of more than 500 community lenders, Inclusiv raises and deploys capital that helps people



navigate financial emergencies and build credit, finances small businesses to help them grow and create quality jobs, and makes homeownership more affordable so families can build wealth and financial stability.

Inclusiv has a long track record of partnering with the federal government to ensure low-income and other financially excluded communities can meet their financial services and credit needs safely and affordably. We have partnered with federal agencies including the Small Business Administration, Treasury Department and Department of Energy to address both acute crises and chronic challenges that put Americans' financial security at risk. We are continuing this work with the administration of our CCIA program overseen by the Environmental Protection Agency (EPA).

### **Small Business Administration – Ensuring PPP Reached Main Street Businesses**

Inclusiv worked extensively with the Trump Administration's Small Business Administration from March 2020-December 2020 to ensure that the Paycheck Protection Program (PPP) was able to reach Main Street businesses across the country. Working in partnership with the SBA's Deputy Associate Administrator, Inclusiv facilitated credit unions' participation in PPP, helping reach small businesses, particularly sole proprietors and other businesses that did not regularly borrow from the big banks.

During this period, the Inclusiv network of credit unions made almost \$2 billion in PPP loans in low-income communities with an average loan size of approximately \$27,000. This enabled businesses to maintain operations and their workforce during the early months of the pandemic, keeping hundreds of thousands of households afloat. Many businesses were able to use that capital and time to reinvent how they could serve their customers, generate income and keep and even sometimes create jobs.

Inclusiv member credit unions serve very small businesses, so their work on PPP had a broader impact beyond just lending. Credit unions helped restaurants shift to a food delivery model to stay open through shutdowns and social distancing, gave small retail businesses the breathing room to reorganize to allow for social distancing, and allowed service industry businesses the opportunity to acquire proper protective equipment for their workforce and customers and to train their staff on safety protocols.

We were in almost weekly engagement with the SBA, which devoted hours of technical support to assist credit union lenders in becoming SBA lenders, accessing the PPP loan submission platform, and working through the details of ongoing reporting and requests for forgiveness. SBA also recognized and supported these small lenders' vital role in PPP by creating windows in which they could submit loans to SBA without having to compete with



large bank automated lending systems that otherwise flooded the system and locked out small lenders.

### **Treasury Community Development Financial Institutions Fund – Financial First Responders**

Inclusiv worked closely with President Trump’s Administration throughout 2020 to provide necessary relief to help people get through the pandemic. Treasury Secretary Mnuchin worked to implement the CARES Act, which was the single largest economic relief effort in the history of our country.

Secretary Mnuchin testified to Congress on his proud work with nearly 400 Community Development Financial Institutions (CDFI) and Minority Depository Institutions, and many more small and non-bank lenders, participating in the PPP program. He also testified about our great work together in implementing a wide range of provisions in the CARES Act.

Inclusiv worked closely with Secretary Mnuchin, CDFI Fund Director Jodie Harris, and many other staff members at the Treasury Department to strengthen the CDFI Fund to better equip CDFIs, including hundreds of CDFI credit unions across the country, to support economic opportunity in their local communities.

### **Department Of Energy (DOE) – Training Community Lenders to Reduce Energy Costs and Increase Resiliency**

Inclusiv’s first federal investment in clean and renewable energy came from the Department of Energy under the Trump Administration. Inclusiv and partner University of New Hampshire Carsey School of Public Policy worked closely with officials in the Department of Energy under Rick Perry. Secretary Perry’s team provided grant support to launch the first ever solar and green lending training program through the office of energy efficiency and renewable energy. In October 2019, Inclusiv launched its Center for Resiliency and Clean Energy to support community lenders to design and scale financing to support consumers, businesses, and homeowners to reduce their environmental impact while creating jobs and opportunities in renewable energy. The funding for this program was continued under the leadership of Secretary Brouillette. Since the Center for Resiliency and Clean Energy’s launch in 2019, Inclusiv and UNH have trained more than 800 lenders across the country to launch programs to reduce energy costs and increase resiliency.



## **GGRF**

The success of Inclusiv’s clean energy lending training program made clear that the communities credit unions serve need fair and affordable financing for energy efficiency and clean energy technologies that help people save money on utility bills. The creation of the Greenhouse Gas Reduction Fund presented an incredible opportunity to ensure that all Americans, particularly people living in communities without banking access, living paycheck-to-paycheck, or struggling to afford their energy bills, have the opportunity to work with a trusted, community-based lender to invest in energy efficiency or clean energy technology for their homes, vehicles or businesses to reduce their expenses and balance their budgets.

Following a thorough and rigorous application process, Inclusiv was selected as one of five awardees for the Greenhouse Gas Reduction Fund Clean Communities Investment Accelerator (CCIA). An additional three organizations were selected under the National Clean Investment Fund. Inclusiv finalized its \$1.87 billion award agreement with the Environmental Protection Agency (EPA) on August 16, 2024. The Inclusiv award invests in community-based credit unions, including Puerto Rico’s financial cooperatives, leveraging additional private capital at least 3:1 to scale renewable energy lending products and services with 100% of the financing being deployed in low-income and disadvantaged communities across the country.

The Inflation Reduction Act established the language governing the Greenhouse Gas Reduction Fund as a total pool of \$27 billion. There were three programs: Solar for All (\$7 billion) intended for state and local entities to increase energy production through solar energy, the Clean Communities Investment Accelerator (\$6 billion) to build the capacity of community lenders to finance renewable energy and energy efficiency projects in low-income and disadvantaged communities, and the National Clean Investment Fund (\$12 billion) to create national green banks to provide ongoing financing of clean and renewable energy projects nationally.

## **GGRF Financial Agreement**

The GGRF structure was designed to maintain extensive government oversight and monitoring of the program and prevent misuse of taxpayer dollars, and thus far all awardees have been fully compliant. Part of this structure includes a financial agency agreement, a robust, long-standing process that has been used to distribute federal funds efficiently and transparently since the 1860s by Republican and Democratic administrations alike. These agreements are designed to preserve full federal oversight and



durable guardrails around the funding while enabling awardees to effectively leverage contractually obligated funds in private financial markets.

In order to manage the GGRF funds, the EPA worked with the US Treasury Department to procure a fiscal agent to hold the funds for CCIA and NCIF awardees and subawardees, which allows for these entities to both deploy the capital and receive payments throughout the program period as they leverage private sector co-investment. The financial agency agreement enables awardees to reflect their awards on their balance sheets and, in turn, work with investors to raise additional private capital for projects. After a rigorous, yearlong process, Citibank was selected as the fiscal agent for this program because of its proven commitment to fiscal due diligence and its ability to be a responsible steward of federal funds. EPA maintains complete oversight of the GGRF funding, just as it maintains oversight over any other grant or financing program it administers, ensuring that funds are used in accordance with the law. As such, the agency is able to guarantee that public investments deliver for the American people and prevent against misuse of funds.

### **Inclusiv CCIA Implementation**

The Inclusiv CCIA program is designed to mobilize credit unions to offer affordable financing to reduce energy costs for American households and businesses, creating quality jobs and greater financial security. Since receiving the award, the Inclusiv team has worked tirelessly to develop the systems to deploy the capital, support the community lenders to grow their programs, monitor the funds and ensure compliance with federal regulations governing funding. We have built and expanded robust grantmaking, compliance, training, technical assistance and data analytics and reporting teams and reinforced our capacity to track both federal funds and private leveraged capital to meet the goals of the program.

At present, Inclusiv has made grant commitments totaling more than \$650 million to 108 community lenders in 27 states and Puerto Rico. The demand for the program has been significant, with more than 250 community lenders signing up to participate in the application process. Those lenders that were not ready to advance to the grant application and grantmaking phase have been enrolled in the Inclusiv Green Home Loans Training program that we deliver in partnership with the University of New Hampshire Center for Impact Finance.

More information about Inclusiv's grant commitments, including selected credit unions and funding by state, is available at the following link: <https://inclusiv.org/news/update-inclusiv-announces-651-million-ccia-awards-across-27-states-puerto-rico>.



## **CCIA Oversight**

This Subcommittee's interest in ensuring that the CCIA program is free of waste, fraud and abuse is a laudable goal that Inclusiv shares. We are conducting our program with the utmost integrity and in compliance with our award agreement. As this document outlines, we have a strong track record of effectively coordinating federal investment through credit unions and we—and credit unions—have a robust culture of compliance.

We are dismayed that the EPA Administrator has sought to freeze the fiscal agency accounts despite no suggestion of fraud, misuse or abuse of funds, or substantial non-compliance that would trigger such an action. The EPA Administrator's action is hindering critical work to help American consumers lower their energy bills at a time too many are choosing between heat and groceries.

We hope the Subcommittee finds this additional information about Inclusiv's CCIA program and track record informative and we welcome Members reaching out to us (please email [aiwanisziw@inclusiv.org](mailto:aiwanisziw@inclusiv.org)) to discuss the program or connect with credit unions to hear more about how this program will be implemented and benefit people and small businesses in communities like yours.