

About ICAST

ICAST (International Center for Appropriate and Sustainable Technology) is a 501(c)(3) nonprofit with a mission to provide economic, environmental, and social benefits to underserved communities in a manner that builds local capacity. ICAST has been utilizing its award-winning one-stop-shop (OSS) approach to deliver green solutions to the multifamily affordable housing (MFAH) market for 20 years. In 2023, ICAST will facilitate energy efficiency (EE) and renewable energy (RE) upgrades in ~50,000 apartments. ICAST has already facilitated over 12,000 very high-efficiency (VHE) heat pump system installs. ICAST is also implementing workforce development programs on the design, installation, and maintenance of VHE heat pump HVAC systems. ICAST is a national leader in designing and managing utility, state, and federal programs that deliver innovative green solutions to low- to moderate-income (LMI) communities.

About TBL Fund

Triple Bottom Line Foundation (TBL Fund) is a nationally recognized, Dept. of Treasury certified, community development financial institution (CDFI). It provides debt and energy financing for clean energy projects that benefit low-to-moderate income (LMI) communities, primarily families living in multifamily affordable housing (MFAH) and Indigenous Tribes. TBL Fund staff combine expertise in affordable housing, project finance, and clean energy deployment. Since its inception in late 2014, TBL Fund has grown its services and expanded nationally, while steadily improving its financial health and maintaining a 0% default rate. TBL Fund has facilitated green retrofits for over 30,000 LMI households—achieving over \$25M in lifetime utility cost savings and abating 643,883 tons of carbon emissions.

Section 2: Apprenticeship Requirements

(4) Please provide comments on any other topics relating to the apprenticeship requirements in § 45(b)(8)(B) that may require guidance.

The Federal definition of a “Registered apprenticeship program” can be difficult to interpret for nonprofits and small community-based organizations that do not have the capacity to employ a legal expert. Thus, ICAST requests that the Department of Treasury further clarify the definition and also make it possible for a Registered Apprenticeship Program to qualify through a State (and not through the DOL).