

Illinois Climate Pollution Reduction Grants: Stretch Code Adoption Grant Responses to Applicant Questions

Notice of Funding Opportunity

[IFA-CPRG-08](#)

August 24, 2026 – August 28, 2026

Question: I'm seeking clarification regarding the indirect cost guidance for the current funding opportunity, specifically as it relates to subrecipients. Our organization has a current Federally Negotiated Indirect Cost Rate Agreement (NICRA), and we would like to better understand how indirect costs may be applied if we participate in a project led by a municipality.

If our organization is included as a subrecipient under a municipal applicant, would we be permitted to charge indirect costs using our existing federally negotiated NICRA? Or would the indirect cost provisions only apply to the lead applicant?

Additionally, could you clarify whether the treatment would be different if our organization were engaged as a contractor/vendor rather than a subrecipient? In that scenario, would our NICRA still be eligible for reimbursement, or would indirect costs need to be incorporated into our contract pricing rather than charged separately?

Response: Under the IFA Stretch Code Adoption Grants NOFO "[o]nly municipalities defined in the Energy Efficient Building Act (20 ILCS 3125/1) as any city, village, or incorporated town, are eligible to apply." See [NOFO](#) at 9-10. The NOFO allows using consultants to prepare applications, "so long as a municipality is the prime applicant. Municipalities that opt to submit collaborative applications must identify one lead applicant to submit the joint application in Euna." See [NOFO](#) at 10. This grant program does not anticipate subrecipients other than municipalities, thus, your organization can participate as a consultant only, not a subrecipient.

IFA and USEPA accept Federally Negotiated Indirect Cost Rate Agreement (NICRA) for the subrecipients, not contractors. See [2 CFR 200.414\(d\)](#). Contractors can incorporate their indirect costs through their contract fees, rather than charge indirect rates to the grant. Unrecovered indirect rates can also be claims as a cost share only by subrecipients. (See [2 CFR 200.306\(c\)](#) noting that "[u]nrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the recipient's or subrecipient's approved indirect cost rate."

The distinction between subrecipients and contractors is defined in [2 CFR 200.331](#) and in the [EPA Subaward Policy Appendix A: Distinctions Between Subrecipients and Contractors](#). See also the definition of the "subrecipient" in [2 CFR 200.1](#). Per 2 CFR 331 and the US EPA Subaward Policy Appendix A, "[a]n entity may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor. The pass-through entity is responsible for making case-by-case determinations to determine whether the entity receiving Federal funds is a subrecipient or a contractor." See [2 CFR 200.331](#), [US EPA Subaward Policy Appendix A](#) at 1.

August 17, 2026 – August 21, 2026

There were no questions submitted this week.

August 10, 2026 – August 14, 2026

There were no questions submitted this week.

August 3, 2026 – August 7, 2026

There were no questions submitted this week.

July 27, 2026 – July 31, 2026

There were no questions submitted this week.

July 20, 2026 – July 24, 2026

There were no questions submitted this week.

July 13, 2026 – July 17, 2026

There were no questions submitted this week.

July 6, 2026 – July 10, 2026

There were no questions submitted this week.

June 29, 2026 – July 2, 2026

There were no questions submitted this week.

June 22, 2026 – June 26, 2026

Question: I'm excited to see the window for the Stretch Code Grant is open again. Can you verify for me that the new ceiling a municipality can apply for is \$1,000,000?

Response: Thanks for reaching out. Municipalities may apply individually for funding of up to \$200,000 each. Municipalities may also collaborate to submit group applications for funding of up to \$1,000,000 for groups of five or more municipalities.

June 15, 2026 – June 19, 2026

There were no questions submitted this week.

The last day to submit questions for IFA-CPRG-08 is December 23rd, 2026, at 5:00 PM CT.



Illinois Climate Pollution Reduction Grants: Stretch Code Adoption Grant

Responses to Applicant Questions

Notice of Funding Opportunity

[IFA-CPRG-07](#)

April 20, 2026 – April 24, 2026

Question: We are uncertain if an applicant is eligible for the grant opportunity based on the organization's role within the government. Please find their explanation below:

The organization is both a department of the city and a registered 501(c)(3) non-profit, staff members are city employees. As an organization, we follow city policies and procedures, and we benefit from some shared services (e.g. the city's finance systems, HR department, IT support, audit, etc.) The organization has its own Board of Directors. New Directors are recommended by the current Board, nominated by the Mayor, and approved by City Council. Our Executive Director reports to both our Board of Directors and the City Manager.

We have implored them to gather as much support from other departments as possible, but when it came time to applying for that grant, would the applicant be eligible to submit the grant?

Response: As a department of a municipality, we do think they're eligible to apply. However, for a strong application, we'd want to see that the organization has municipal authority or a connection to or support from the department responsible for adopting or enforcing building codes. So, for example, an application purely for public outreach, without any participation or interest from the city's permitting department, probably wouldn't be strong.

April 13, 2026 – April 17, 2026

There were no questions submitted this week.

April 6, 2026 – April 10, 2026

Question: Is clean transportation part of the Stretch Code?

Response: Yes, there are varying degrees of EV-infrastructure requirements in the Stretch and Base Code.

Question: How long is the funding for? One year?

Response: No, all grant agreements will last through September 30, 2029, regardless of when they are signed.

Question: With regards to the Stretch Codes, for clarity, your Stretch Code doesn't necessarily have to be fully complete in order to apply for the grant, as long as you're in the process of completing it, correct?

Response: Correct, you do not have to have adopted the Stretch Code in order to apply for the grant. You also do not have to be in the process of completing it either. Any municipality is eligible to apply for this grant, regardless of Stretch Code status. Additionally, it is *not* required that grantees adopt the Stretch



Code by the end of the grant period, just that they perform eligible activities to encourage the adoption of the Stretch Code.

Question: I see that this grant is for educational purposes as well. Could this grant be used for student education around sustainability and renewable energy?

Response: That likely would not be aligned with this grant opportunity, since a municipality needs to be involved.

Question: Does the IL Climate Bank offer money for Building Performance Standards (BPS) adoption?

Response: The Illinois Climate Bank does not have a separate program specifically for BPS adoption. However, one of the eligible activities under the Stretch Code adoption grants is staged code modernization and incremental updates. From the NOFO: [The grant can be used to] “support municipalities in developing a structured, phased approach to updating base codes, such as electrical and mechanical codes, before full stretch code adoption. Funds may support staff time or consultant services to review existing codes, identify necessary updates, and draft phased modernization plans aligned with the stretch code.”

Question: There was a question about whether grant funds could be used by a municipality for supporting adoption and/or implementation of a building performance standards (BPS) policy. The response seemed to indicate that BPS adoption/implementation could be funded under the code modernization eligible activity category. Could you please advise regarding whether grant funds can be used for BPS adoption and implementation? Thanks again.

Response: Apologies for any confusion. As the current program is structured, BPS on its own is not a strong fit for Incremental Code Modernization under this NOFO. That objective is specifically designed to support updates to base building codes that would directly enable future stretch code adoption. BPS is more of a policy framework rather than an adopted building code, and if not intentionally designed to be complementary, it can create misaligned performance expectations across new and existing buildings.

If an applicant wants to include BPS, they would need to clearly demonstrate how it is part of a structured pathway grounded in code updates that leads to stretch code adoption. This would also require demonstrating direct alignment with the current stretch energy code standard and outlining how existing buildings could realistically meet those standards without being cost prohibitive. While BPS could ultimately contribute to meaningful GHG emissions reductions, it would need to be supported by a very compelling narrative that clearly ties back to the program’s core objective of enabling stretch code adoption.

Even with that framing, BPS related activities would likely be considered secondary compared to direct code modernization efforts.

March 30, 2026 – April 3, 2026

There were no questions submitted this week.

March 23, 2026 – March 27, 2026

There were no questions submitted this week.

March 16, 2026 – March 20, 2026

There were no questions submitted this week.

March 9, 2026 – March 13, 2026

There were no questions submitted this week.

March 2, 2026 – March 6, 2026

There were no questions submitted this week.

February 23, 2026 – February 27, 2026

There were no questions submitted this week.

February 17, 2026 – February 20, 2026

There were no questions submitted this week.

February 9, 2026 – February 13, 2026

There were no questions submitted this week.

February 2, 2026 – February 6, 2026

There were no questions submitted this week.

The last day to submit questions for IFA-CPRG-07 is **April 24th, 2026, at 5:00 PM CT.**



Illinois Climate Pollution Reduction Grants: Stretch Code Adoption Grant

Responses to Applicant Questions

Notice of Funding Opportunity

[IFA-CPRG-03](#)

December 29, 2025 – December 31, 2025

Question: We're finalizing our Stretch Code Adoption Grant application and we don't see an item #6 "Subrecipient" in the Amplifund budget section - should we classify working with [REDACTED] instead as #7. Consultant Services and Expenses?

Response: Yes, please list [REDACTED] under #7 Consultant Services and Expenses.

December 22, 2025 – December 26, 2025

There were no questions submitted this week.

December 15, 2025 – December 19, 2025

Question: Do you know or expect that IFA will open up a new round of funding in 2026 for the same grant?

Response: Yes! As of right now, we expect to open a new round of funding for Stretch Code adoption grants each year through 2029. You can find the estimated funding amounts for this program on the CSFA posting: [CSFA](#).

December 8, 2025 – December 12, 2025

Question: The current Chicago Energy Transformation Code 2022 exceeds the Stretch Code site energy index standard from 6/30/24 to 12/31/26. If the City of Chicago embarks on an update to the Chicago Energy Transformation Code to update its base building codes, including mechanical, electrical, and prescriptive building codes, that will align with or exceed upcoming Stretch Code updates, then will our activities be eligible for this funding opportunity?

Response: The Stretch Code Adoption funding opportunity is intended to support jurisdictions that commit to aligning with or exceeding the Illinois Stretch Energy Code and that demonstrate measurable greenhouse gas emissions reductions and long-term energy efficiency improvements relative to their existing baseline or current code. A jurisdiction's activities may be eligible where there is a clear commitment that planned code updates will align with or exceed the Illinois Stretch Energy Code requirements and advance the program's stated objectives and metrics.

As described in the Notice of Funding Opportunity (p. 8), the program's emissions reduction and energy efficiency objective is measured through ongoing energy efficiency improvements in funded communities, assessed against CEJA's site energy index benchmarks, as well as assessments of greenhouse gas and other emissions reductions resulting from stretch code implementation.



In addition, the selection criteria (NOFO, p. 17) consider the extent to which proposed activities are expected to increase energy efficiency, reduce greenhouse gas emissions, and align with Illinois' long-term climate and energy goals.

December 1, 2025 – December 5, 2025

There were no questions submitted this week.

November 24, 2025 – November 26, 2025

There were no questions submitted this week.

November 17, 2025 – November 21, 2025

There were no questions submitted this week.

November 10, 2025 – November 14, 2025

There were no questions submitted this week.

November 3, 2025 – November 7, 2025

There were no questions submitted this week.

October 27, 2025 – October 31, 2025

There were no questions submitted this week.

October 20, 2025 – October 24, 2025

There were no questions submitted this week.

October 13, 2025 – October 17, 2025

Question: Do applicants have to commit to passing the stretch code in their application for this grant? Is there a punishment for not adopting the stretch code?

Response: No. As stated in the NOFO, applicants must commit to performing activities that support the adoption of the stretch code. Applicants must demonstrate an intention and plan to adopt the Illinois Stretch Code, align with statewide goals, or implement base code updates as a strategic step towards full stretch code adoption. There is therefore no penalty for not adopting the stretch code under this grant.

October 6, 2025 – October 10, 2025

There were no questions submitted this week.

September 29, 2025 – October 3, 2025

There were no questions submitted this week.

September 22, 2025 – September 26, 2025

There were no questions submitted this week.

September 15, 2025 – September 19, 2025

There were no questions submitted this week.

September 8, 2025 – September 12, 2025

There were no questions submitted this week.

September 2, 2025 – September 5, 2025

There were no questions submitted this week.

August 25, 2025 – August 29, 2025

There were no questions submitted this week.

August 18, 2025 – August 22, 2025

There were no questions submitted this week.

August 11, 2025 – August 15, 2025

Question: Is there a cost effectiveness analysis for commercial also?

Response: Not specific to IL due to the varied types of commercial buildings. PNNL has done a commercial analysis of the 2024 IECC. In the NOFO, one of the eligible activities is cost-benefit analysis. If your municipality would like to conduct a cost-benefit analysis to see what the impact of adopting stretch codes is, that would be an eligible activity under this grant.

Question: Can we apply if we've already adopted the Stretch Code?

Response: Yes, you can apply if you are a municipality that has already adopted the Stretch Code but need help with implementation. If you are a municipality that has adopted stretch codes and have implementation activities that fall under planning activities, we encourage you to apply.

Question: Who are the consultants supporting implementation?

Response: There are a number of nonprofit and consulting groups that work on Illinois Stretch Energy Code, and hiring consultants is an eligible activity. [The Building Energy Hub](#) is happy to be a connector with the nonprofit and private consultants on this call, or outside of it, that might be interested in providing support. If a municipality is going to let a Request for Proposal, the Hub is happy to host that under their municipal site.

Question: There are many municipalities whose codes are not up to date, so that would be a challenge to qualify for the Stretch Code grants.



Response: One of the programmatic objectives is incremental code modernization. Municipalities can use grant funding to update base codes, as long as they show a clear plan and intention to adopt the stretch codes once the base code updates are made.

Question: Are you aware of which municipalities have these challenges?

Response: We are not aware of specific municipalities, but we received feedback during stakeholder engagement that this was a barrier. This feedback led to development of incremental code modernization as an eligible activity.

There is a self-reporting requirement for all municipalities in the state, to report building codes to [Capital Development Board](#). There is a [directory](#) on the Capital Development Board website to look up any municipality to see what codes they have adopted. You can check the codes for individual municipalities, CDB can run a report to group municipalities based on their codes.

Question: Since it's only municipalities that can participate, does this funding only apply to public buildings?

Response: Municipalities identify the building codes, any buildings within a municipality's jurisdiction must follow the codes that are adopted for said jurisdiction. This would apply for all buildings within jurisdiction, not just public or municipal buildings.

August 4, 2025 – August 8, 2025

There were no questions submitted this week.

July 28, 2025 – August 1, 2025

There were no questions submitted this week.

July 21, 2025 – July 25, 2025

Question: Thank you again for calling so promptly. I will give a brief overview. The development department has reservations about adopting the stretch code due to the cost it imposes on our rural area. Our jurisdiction is unincorporated, so many farming communities. Our department has a funding source that could cover up to \$100,000 for contractors, builders etc. that could cover the cost related to adopt the stretch codes. I have been reaching out to contractors in [REDACTED], as they will be the first to adopt the codes in October to get some real numbers but no luck so far.

So, the development department would like to have the stretch codes optional and not mandated and anyone that does implement the codes will receive a rebate to cover the cost. So, my ultimate question, and you may or may not be able to answer, would that be acceptable in terms of the grant, to apply if the stretch codes would be not adopted, but optional?

Response: Thanks for clarifying your question, I appreciate it! I am unfortunately going to answer your question with another question – does [REDACTED] have the authority to adopt the stretch code on behalf of its unincorporated communities? If yes, then you would be eligible to apply. More information below.

Ultimately, the goal of our program is to get municipalities to adopt the Stretch Code and reduce greenhouse gas emissions. If [REDACTED] can make the case that the money will be used for eligible activities as stated in the NOFO, and describe how your activities will lead to greenhouse gas emissions reductions, then IFA would encourage you to apply. However, in your application, you will also need to



clearly explain what [REDACTED] jurisdiction over building codes is and what role you would be playing in code adoption. We were under the impression that generally, counties cannot set building codes, and we have not heard of doing optional adoption before. As a reminder, incremental code adoption is an eligible activity under the NOFO, but the County needs to have the authority to impose those code updates.

If you do intend to apply, one eligible activity outlined in the NOFO is cost-benefit analysis – you could use stretch code funding to do research into what the potential costs to contractors and builders.

July 15, 2025 – July 18, 2025

Question: Can a county apply for the stretch code adoption grant as a lead applicant and have sub-recipient or entity with codes experience?

Response: Yes, a county is eligible to apply for the Stretch Code Adoption and Implementation grants provided they have the jurisdiction and authority to update and enforce building codes. Allocating funding to a subrecipient for various purposes is allowed under this grant.

The last day to submit questions for IFA-CPRG-03 is December 19, 2025, at 5:00 PM CT or when funding is expended, whichever comes first.



Responses to Applicant Questions

Notice of Funding Opportunity

[IFA-CPRG-01](#)

May 12, 2025 – May 16, 2025

There were no questions submitted this week.

May 5, 2025 – May 9, 2025

Question: Can the implemented stretch codes exceed the State of Illinois criteria?

Response: We encourage you to apply as long as you can demonstrate eligible activities and how they will address core objectives. In the applicant, please explain how stretch codes exceeding State of Illinois criteria would result in additional realized energy efficiency and GHG reductions. We also recommend checking with the Capital Development Board on stretch code rules to make sure this approach is allowed, but if it is, we would love to see those applications.

Question: How specific in terms of timing does the implementation of the stretch code have to be?

Response: Applicants should outline their proposed deliverables and timelines in Attachment A using their best judgment about when the eligible activities they are requesting funding for—and the associated critical milestones—will occur. While awarded projects will be required to report on metrics, particularly greenhouse gas emissions reductions and other selected performance metrics, through September 2029, projects and funds can be completed or fully expended before the end of the CPRG grant period.

Question: Will the grants enable us to test how implementation of the Stretch Code may impact competitive development in a given community?

Response: This is not currently on the list of eligible activities, but if you believe it addresses the core objectives listed in the NOFO, we encourage you to submit an application.

Question: Does implementation mean only activities directly supportive of adoption, or would minor improvements to achieve compliance in municipal facilities also be included as an implementation activity?

Response: Implementation in the NOFO refers to activities that help a municipality implement the Illinois Stretch Energy Code once it is adopted. This includes a range of eligible activities outlined in the NOFO, such as staff training, public outreach, code enforcement preparation, and contractor readiness. However, the grant can also support several activities prior to or facilitating adoption, including incremental code modernization and updating base codes necessary for stretch code adoption. Please review the NOFO for a list of eligible activities. Applications focused on incremental improvements should clearly outline which base codes are being updated and how these efforts are expected to lead toward future stretch code adoption. Minor improvements solely for municipal facility compliance are not the primary focus unless they are part of broader eligible activities supporting adoption or implementation aligned with program objectives.



Question: Does the city need to adopt the stretch code first? Our city is considering it but has not voted or decided on it yet. Does this mean we cannot bid?

Response: This grant is intended to provide funding for all of the steps leading to Stretch Code adoption and provide support on implementation. If you have not yet adopted the Stretch Code, but you're looking for staff training, or working with city council members, or doing community outreach to inform residents about the benefits, this grant can be used for that.

Question: Can the funding be used to offset permitting fees to the consumer/permit applicant?

Response: Applications will be evaluated based on how well they meet the programmatic objectives through eligible activities as outlined in the NOFO. All applicants are encouraged to apply if they believe their proposed project aligns with these objectives. While the NOFO does not explicitly list offsetting permitting fees as an eligible activity, applicants should clearly describe how their proposed use of funds advances the core objectives of municipal capacity building, community engagement, incremental code modernization, and emissions reductions to be considered for funding.

Question: Does the IFA or the groups running these webinars have availability to meet with nonprofits before submitting to answer specific questions/help think through specific types of outreach?

Response: No. Unfortunately, State law associated with Illinois grants is designed to ensure all grantees have the same information, so we are not allowed to meet with applicants or provide individual technical assistance.

Question: When can applicants expect to hear if they have been selected and how soon is work expected to start?

Response: IFA/CB will get responses back to applicants within a month after they close, and work will start quickly after. Project start date will vary by grant.

Question: What is the timeline of the Climate Bank in terms of opening additional funding opportunities? Are these all the NOFOs the Climate Bank will be releasing this year?

Response: For the Solar for All programs, these are the only two grant programs opening this year. IFA/CB does have a number of Solar for All financing (loan) programs that we're working to get out by the end of the year, but they won't involve NOFOs. For CPRG, IFA/CB is working on a number of programs that were outlined within the initial workplan application that went to U.S. EPA. There will be additional NOFOs for new programs under CPRG. We are working diligently to get those programs up and running. There are also a number of other programs that IFA/CB works on, including the 40101(d) Grid Resilience grants. Another NOFO under that program will open soon. IFA/CB will continue to have webinars as other NOFOs/programs open.

Question: Will these grants open up again in the near future? Or are they only being funded for this FY?

Response: If we do not receive enough qualified applications from these programs during this application window, IFA/CB reserves the right to open a later application window later this year, no earlier than June. Each of these grants has multi-year funding at this time, so we plan to open NOFOs yearly each spring for the next 5 years. However, if there is a lack of interest or we receive feedback on the program, IFA/CB may change its plans for future rounds of funding.



Question: For educational/ school districts, which grant opportunities would be appropriate for them to apply for? Additionally, would houses of worship be eligible for these grants and if so, which ones?

Response: For Climate Pollution Reduction Grants programs, the Stretch Code Adoption Grants are intended for units of local government. The Small Utility Clean Energy Planning grant is intended for municipal or electric utilities. We don't think either of these entities are the intended audience for these grants, but if you disagree, you are free to apply.

April 28, 2025 – May 2, 2025

Question: Can a municipality apply to the Stretch Codes Adoption grant more than once?

Response: The answer yes, municipalities may apply more than once, but the municipality must apply for a different eligible activity, and they may not duplicate GHG emissions. They would have to show how they would avoid "double counting" GHG emissions from both projects.

Question: Since it is a rolling deadline, are you anticipating another call for projects or is it hoped that all funds will be used on this call?

Response: The rolling deadline will depend on the number of qualified projects we receive. IFA is not committed to opening a second window for applications this year. If funds are not exhausted after the initial application window, a rolling window will be opened. If we receive enough qualified projects to expend the \$3.6M allocated for this round of funding, we will not open a rolling window this year. However, there will be another Stretch Code opportunity next year, as IFA has allocated \$3.6M across five years for a total of \$18M for this program.

Question: How much time does a municipality have to spend the funds if awarded?

Response: All awarded funds must be spent, and all project work and performance reporting will be within the federal performance period ending in fall 2029.

Question: Can a municipality phase their work over 2-3 years leading up to adoption of the stretch codes?

Response: The program allows for a phased approach. Municipalities can structure their project over multiple years, including incremental code modernization steps, as long as the project demonstrates a clear, structured process toward stretch code adoption and/or implementation within the performance period.

April 21, 2025 – April 25, 2025

There were no questions submitted this week.

The last day to submit questions for IFA-CPRG-01 is May 16th at 5:00 PM CT.