

**COMMONWEALTH OF MASSACHUSETTS  
MASS SAVE THREE-YEAR PROGRAM REVIEW  
2025 - 2027**



September 20, 2023

**TO:** Elizabeth Mahoney  
Chair, Energy Efficiency Advisory Council (EEAC)  
Commissioner, Massachusetts Department of Energy Resources (DOER)  
100 Cambridge St, Suite 1020 Boston, MA 02114

**FROM:** Browning the Green Space

**RE:** Browning the Green Space recommendations to support economic opportunity for returning citizens in the 2025-2027 Three-Year Energy Efficiency Plan

Browning the Green Space (BGS) would like to commend the DOER, EEAC and the Program Administrators (PAs) for the sustained success in building and maintaining a nation leading energy efficiency program and for the opportunity to provide priority recommendations for consideration in the 2025-2027 Three-Year Energy Efficiency Plan. Your willingness to consider and adjust plans based on public input from the ratepayers who fund these nation leading programs is paramount to maintaining a transparent and inclusive process.

BGS is a nonprofit coalition of leaders and organizations that share the passion to advance Diversity, Equity, and Inclusion in clean energy. We seek to facilitate a just energy transition by putting Black and Brown communities first, and enabling systems change at the intersection of social, environmental, and economic justice. We are powering a just energy transition by creating jobs, building wealth, and reducing energy burden in Black and Brown communities. By removing barriers and expanding access, we seek to close the racial wealth gap while combating climate change.

BGS seeks to create pathways to employment and remove barriers to employment in the clean energy sector. In partnership with multiple organizations and as part of MassCEC's \$18 million investment into clean energy workforce development in 2023, BGS is helping to launch 3 different equity workforce training programs in the energy efficiency sector.<sup>1</sup> One focused on returning citizens (people who have been previously incarcerated or been impacted by the criminal justice system), one focused on high school students, and one focused on incumbent worker training for Black and Brown contractors.<sup>2</sup> Additionally, we have supported utility-sponsored programs such as the Community-First Partnership program as a subcontractor to support outreach, recruitment, and process improvements for the 2022 application process.

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<sup>1</sup> [Healey-Driscoll Administration Awards \\$18 million to Drive Equitable Workforce Development](#)

<sup>2</sup> *ibid*

**In 2023, BGS started convening a CORI (Criminal Offender Record Information) Working Group with representation from Action 4 Equity, Transformational Prison Project, LISC, and BlocPower to understand the barriers to entry into energy efficiency careers and formulate shared recommendations on improvements to support equitable workforce development.** Through this work, we have identified structural and process barriers preventing access to quality jobs in the energy efficiency sector and recommendations to provide economic opportunities to an underserved population (returning citizens). Reducing barriers for returning citizens to enter the high performance buildings sector will leverage existing investments made through MassCEC, support diversity goals within the clean energy sector as a whole, and help meet the burgeoning workforce demands of the energy efficiency sector in Massachusetts.

BGS would like to make the following recommendations for consideration by the EEAC and PAs for inclusion in the 2025-2027 Three-Year Energy Efficiency Plan:

**#1: Review and reform Mass Save background check policies and advocacy pathways for contractors and employees to make them more inclusive and CORI friendly.**

BGS would like to recommend a comprehensive review and reform of background check policies and processes for evaluation across all PAs to eliminate existing barriers to entry into the clean energy workforce for returning citizens. The current background check policies do not specify which type of offenses/convictions are considered or whether they relate to the work being done by prospective employees. Additionally, the advocacy pathway available for individuals who receive a “needs review” on their background check result provides little transparency around the decision making criteria, process, and timeline.

Both of these approaches create barriers for people with CORIs, which disproportionately are also people of color due to the highly racialized criminal justice system in the U.S., by either taking them out of the running for a position for offenses/convictions unrelated to the work requirements or discouraging them from applying in the first place. Reform of the Mass Save program’s approach to background check policies presents an opportunity to open up avenues to training and employment for thousands of Massachusetts residents currently not participating in the sector. BGS would like to recommend the following reforms and processes for consideration by the EEAC and PAs during the ongoing planning cycle:

- A. **Establish a specific and relevant list of the offenses/convictions scrutinized during the background check process under the Mass Save program.** Avoiding broad categories such as “misdemeanor” or “felony” and outlining specific offenses that are directly connected to the job/work being done and the risk involved will open the door to many qualified individuals in accessing quality clean energy jobs.
- B. **Develop a transparent and accessible advocacy pathway for Mass Save Contractors and their employees.** Increasing clarity around the criteria, process, and timeline will support contractors in advocating for a prospective employee whose employment has been blocked due to a CORI hit on their background check. A clear rubric around consideration factors should be developed and shared publicly.

Considerations such as the date of the offense, age of the individual at time of offense, specific circumstances surrounding the offense as well as any relevant evidence of suitability for the position and/or rehabilitation submitted by the candidate should be included. The offense that shows up on an individual's CORI may be completely unrelated to not only the job duties in question but also unrelated to who that person is today.

- C. **Coordinate reform across all Program Administrators to increase consistency and transparency.** Making adjustments to existing policies and processes to establish consistency will support training program providers, community-based organizations, contractors, and other stakeholders in communicating the employment opportunities available to returning citizens in the energy efficiency sector. Consistent policies also removes the uncertainty around available opportunities for candidates looking to enter this sector.
- D. **Engage reentry organizations, systems impacted persons and other community stakeholders in the reform process.** BGS acknowledges that this is not a comprehensive list of possible reforms to make the industry more accessible to returning citizens. As such, BGS strongly encourages the EEAC and PAs to carry out a robust stakeholder engagement process to inform the development of specific reforms.

## **#2: Develop workforce equity outcomes with a specific focus on returning citizens**

In parallel to policy reform, BGS would like to encourage the EEAC and PAs to incorporate workforce equity outcomes and goals into the next plan. According to the Massachusetts Department of Corrections Releases Dashboard, over 20,000 individuals have been released from incarceration over the past 5 years.<sup>3</sup> At the same time, the Commonwealth is facing a labor shortage that has been exacerbated by the pandemic over the past three years. The recent MassCEC Workforce Needs Assessment indicated that the Massachusetts clean energy workforce needs to grow by 37% by 2030.<sup>4</sup> BGS believes support for returning citizens is an important priority of focus for the upcoming planning cycle to both meet the current workforce demands of the energy efficiency sector and open up economic opportunities for populations that have previously been excluded from participating in this sector. BGS would like to recommend the following to support the Mass Save program in tapping into the available talent for this in-demand sector in the next three year plan:

- A. **Allocate funds for outreach and education on the updated background check policies and the opportunities available for returning citizens.** Additional communication and targeted outreach to both Mass Save contractors and returning citizens will be necessary to dispel prior ambiguity and combat fear-based narratives surrounding hiring this population.
- B. **Partner with reentry organizations, systems impacted persons and other community stakeholders serving returning citizens on all outreach and education.** These partnerships could include other community based organizations who have

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<sup>3</sup> <https://www.mass.gov/info-details/releases-dashboard>

<sup>4</sup> "[Powering the Future: A Massachusetts Clean Energy Workforce Needs Assessment](#)", page 10

training programs or do education/outreach to residents on career awareness. BGS and BlocPower are partnered on a Workforce Equity Training Program funded by MassCEC that seeks to support returning citizens in accessing clean energy jobs.

- C. **Incentivize training for Mass Save contractors on diversity, equity, and inclusion (DEI) to further advance workforce equity outcomes.**
- D. **Determine an appropriate structure to incentivize hiring and retaining returning citizens through the Mass Save program.**

Thank you for considering these recommendations for improvements to the Mass Save program. We believe that the Mass Save program is not only a critical part of the Commonwealth's climate strategy but an important avenue to family sustaining jobs for thousands of Massachusetts residents. We hope that these policies serve as a starting point for this next round of critical revisions to this program.

Sincerely,

A handwritten signature in black ink that reads "Kerry Bowie". The signature is written in a cursive, flowing style.

Kerry Bowie  
Executive Director, Browning the Green Space