

# “Ensuring Strong Stewardship and Customer Service in RBCS Guaranteed Lending and Other Programs”

## Frequently Asked Questions

### Guaranteed Loans:

**Q1: Are solar and wind projects eligible under the B&I Guaranteed Loan Program?**

A1: Solar and wind projects are no longer eligible under the B&I Program as per the Unnumbered Letter (UL) “Ensuring Strong Stewardship and Customer Service in RBCS Guaranteed Lending and Other Programs” released on 8.18.2025.

**Q2: Are solar and wind projects eligible under the REAP Guaranteed Loan Program?**

A2: Certain solar and wind projects are eligible under the REAP guaranteed loan program. Projects that meet any one of the four criteria outlined in the UL “Ensuring Strong Stewardship and Customer Service in RBCS Guaranteed Lending and Other Programs”. are not eligible. The decision tree in Attachment 1 can be used to help you determine eligibility.

**Q3: Is the project eligible for a REAP guaranteed loan if the solar panels are made in the USA but the inverters are made in a country named as a foreign adversary such as China?**

A3: No. To be eligible, all components of the solar photovoltaic system must be made in countries which are not named as a foreign adversary.

**Q4: Does wiring and other balance of system components need to be made in a country which is not named as a foreign adversary?**

A4: Only major system components should be reviewed as the Agency does not have capacity to evaluate origin of all balance of system components. Spec sheets are typically provided for solar panels, inverters, racking, controllers, and batteries (if using).

**Q5: How should I handle wind and solar guaranteed loans that have been submitted but are not yet fully processed?**

A5: For B&I guaranteed loans, notify the lender that we are no longer funding solar and wind projects that are in conflict with the UL and ask the lender to withdraw the application. If the lender does not withdraw the application, then the Agency will proceed to deny the application and issue a formal adverse decision letter. For REAP guaranteed loans, first determine if the project meets any of the noted criteria. If yes, notify the lender that we are no longer funding projects of this nature and ask them to withdraw the application. If the project does not meet any of the criteria, proceed with the application.

**Q6: If I have a wind or solar guaranteed loan with an outstanding conditional commitment will it be honored?**

A6: Yes, outstanding conditional commitments will be honored.

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**Q7: Do we document this un-numbered letter in lieu of specific 5001 regulation as justification for denial in our adverse decision letter of a guaranteed loan that does not meet the requirements of the UL?**

A7: Yes. A template will be provided for use.

#### Grants:

**Q7: Are solar and wind REAP grants ineligible if they meet any of the criteria noted above?**

A: Solar and wind REAP grants are still eligible if they meet any of the criteria listed in the UL, however they will be disincentivized via forthcoming changes to the scoring criteria. No action is needed at this time on REAP grants. An amended REAP notice will be forthcoming to outline the changes.

**Q8: Should we disincentivize existing REAP Farm Bill grant applications that will be competing soon?**

A8: No action is needed at this time on REAP grants. An amended REAP notice will be forthcoming to outline the changes.

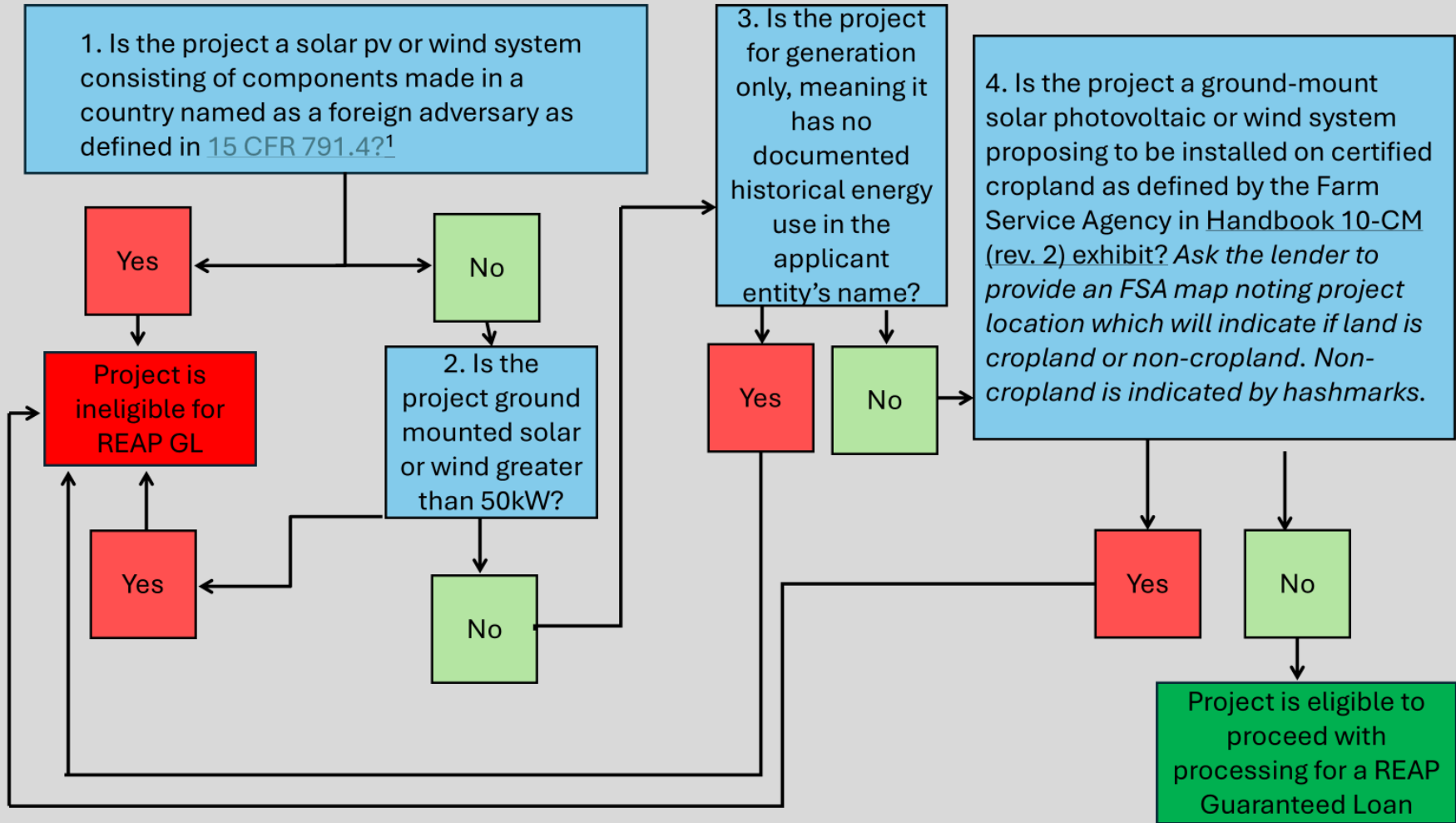
**Q9: Does the disadvantaged scoring criteria apply to FY24/FY25 REAP IRA grant applications that are currently pending?**

A9: No action is needed at this time on pending REAP IRA grant applications. We await a decision on IRA funding.

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Attachment 1.

\*Note that this decision tree applies to **REAP guaranteed loans only**. Wind and solar projects are no longer eligible for B&I guaranteed loans per the UL issued on 8/18/2025.



<sup>1</sup>Foreign Adversaries as of date of publication include: The People's Republic of China, including the Hong Kong Special Administrative Region and the Macau Special Administrative Region (China); Republic of Cuba (Cuba); Islamic Republic of Iran (Iran); Democratic People's Republic of Korea (North Korea); Russian Federation (Russia); and Venezuelan politician Nicolas Maduro (Maduro regime, or Venezuela as long as Maduro is in power)