Home Energy Rebates (IRA Sections 50121 and 50122): Consumer Protection Plan Required Elements and Sample Responses

June 2024

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Acronyms and Abbreviations

States are encouraged to include a state-specific acronyms and abbreviations section in their Consumer Protection Plans (CPPs). An example is provided below for reference, to be customized by states. States should customize the example table below to ensure all acronyms and abbreviations used in their CPPs are included in a similar table, and conversely, all acronyms and abbreviations in a similar table are used somewhere in their document.

ADA	Americans with Disabilities Act
AMI	Area Median Income
ANSI	American National Standards Institute
API	Application Programming Interface
BPI	Building Performance Institute
BSI	Building Safety Inspector
CEO	Code Enforcement Official
CRM	Customer Relationship Management
DIY	Do-it-yourself
DOE	Department of Energy
EER	Eligible Entity Representative
HEAR	Home Electrification and Appliance Rebate Program
HEP	Home Energy Professional
HOMES	Home Efficiency Rebate Program
ICC	International Code Council
IRA	Inflation Reduction Act
QA	Quality Assurance
QC	Quality Control
QEP	Qualified Electrification Projects
RVI	Remote Virtual Inspections
SLA	Service Level Agreement

Introduction

The U.S. Department of Energy (DOE) is providing this document to support states' development of the required Consumer Protection Plan for the Home Energy Rebate programs. States may use the following sections of this document as a template for developing their plans; please see additional detail below in the "About this Document" section. Each state and territory[1] must submit and receive DOE approval for a Consumer Protection Plan for each separate rebate program award 60 days prior to program launch, which is generally understood as the first date that the state begins to accept rebate claims.

This sample response template aligns with Section 3.2.5 and Section 4.2.5 of DOE's [Home Energy Rebate Programs Requirements and Application Instructions](), which describes what states need to provide in a Consumer Protection Plan for the Home Efficiency Rebates (Inflation Reduction Act (IRA) section 50121) (HOMES) and the Home Electrification and Appliance Rebates (IRA section 50122) (HEAR), respectively.

The state's Consumer Protection Plan must meet the following requirements:

- Be readily accessible (e.g., on the program's website) to all program participants affected by it. States should also consider how they can make the Consumer Protection Plan accessible to households that lack internet access, such as by providing a paper copy of the plan upon request or a "Consumer Rights" fact sheet to every household that receives a rebate.
  - For Home Efficiency Rebates (Section 50121), program participants include implementers, participating contractors, third-party inspectors, aggregators, homeowners, and building owners.
  - For Home Electrification and Appliance Rebates (Section 50122), program participants include implementers, retailers, distributors, participating contractors, third-party inspectors, eligible entities, and eligible entity representatives.
- Identify what proactive steps the state will take to identify, mitigate, and reduce fraud, waste, or abuse.
- States or their program implementers must execute agreements with participating aggregators (Section 50121), retailers/distributors (Section 50122), and contractors in which the party agrees to comply with required QA/QC processes.
- States must retain records related to their QA/QC processes and permit DOE to access the records upon request. See the Data Review Section of this document for details.
- A state must review its Consumer Protection Plan at least every two years, adjust based on lessons learned, and communicate changes to contractors, aggregators (Section 50121), retailers/distributors (Section 50122), third-party inspectors, and DOE.

[1] For the purposes of this document, "states" means, collectively or individually, the 50 states, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands.

- A state must provide DOE with information regarding the state's monitoring, review, and revision of the plan based on program performance, with the reporting frequency subject to agreement with DOE but should be set as a minimum of every two (2) years.

The state's Consumer Protection Plan must also include consideration of required elements that fit within the following categories, roughly a page or more of content on each:

- Consumer Feedback
- Resolution Procedures
- Data Review
- Onsite and Virtual Inspection
- Contractors and Other Partners
- Installation
- Continuous Improvement, including:
    - Addressing any proliferation of Unfair Business Practices
    - Improving Poor Program Function for Consumers
- Additional requirements for owners of low-income rental housing

About this Document

Structure of Each Section

For each section in the sample application below, the requirements are listed first (e.g., *Consumer Feedback: Requirements*), and the sample response follows immediately in the following subsection (e.g., *Consumer Feedback: Sample Response*). The Requirements sections are highlighted with a black line along the left border to distinguish the requirements text from the Sample Response section text.

This document is provided as guidance to each state participating in the Home Energy Rebates program. States are responsible for ensuring their Consumer Protection Plans accurately reflect their individual program design and requirements.

Sample Text and Prompts

The sample text in each section below is one of three types depending on how the sample text is intended to be used by the state, as follows:

- {ORANGE SMALL CAPS ITEMS IN CURLY BRACKETS CONTAIN INSTRUCTIONS AND DESCRIPTIONS OF THE TYPE OF RESPONSE EXPECTED. STAFF SHOULD DRAFT A DETAILED STATE-SPECIFIC RESPONSE, LIKELY WITH INPUT FROM OTHERS INCLUDING SUBJECT MATTER EXPERTS.}
- [BLUE SMALL CAPS ITEMS IN SQUARE BRACKETS ARE SHORTER, STATE-SPECIFIC TEMPLATE EDITS, E.G., ENTER THE NAME OF YOUR STATE, TIMEFRAME, OR WEBSITE ADDRESS.]
- Plain text items may be copied verbatim, or with edits to convey nuances in the state response that are not present in the sample text.

There may be some overlap between these three types of sample language and states should edit as needed to represent their plans as clearly and accurately as possible.

Requirements & Sample Responses

Consumer Feedback: Requirements

To meet the requirements for the Consumer Feedback element, a state must have a system for collecting and responding to consumer feedback that:

- Allows households to file complaints, concerns, and issues directly to the implementer(s) (e.g., a consumer hotline and/or email).
- Contains procedures for addressing negative feedback, including how programs will communicate the feedback to affected contractors, aggregators (Section 50121), eligible entity representatives (Section 50122), and/or distributors/retailers (Section 50122).
- Includes a requirement that a consumer satisfaction survey be sent to the household at least three (3) months and no more than six (6) months after the project's completion date. At a minimum, the survey must include the questions listed in Table 1 of Appendix A: Consumer Satisfaction Questions of this document.[2] States may also include additional questions to their customer satisfaction surveys based on their local needs.

In this section, a state should also describe how it will incorporate consumer feedback into future updates of its rebates program design and its Consumer Protection Plan.

Consumer Feedback: Sample Response

- The state will provide household consumers with the ability to file complaints, concerns, and issues via a consumer hotline, email, and webform (online intake tool).

  Consumers can ask general questions about the state program or issue a complaint or concern regarding program services by sending an email to [ENTER STATE EMAIL] or by calling [ENTER STATE TELEPHONE NUMBER]. When a consumer reports an issue, a staff member will reach out within two (2) business days.
- All consumer feedback reporting mechanisms, documents, and other communications will meet ADA accessibility standards and the needs of non-English language speakers, including documents available in Spanish and other languages as appropriate. Consumers can also request hard copies of online documents.

  More information about the program as well as this Consumer Protection Plan is found here: [ENTER WEBPAGE].
- If consumers use a consumer hotline phone number to submit information regarding program issues, the state will record the call to capture the background of the customer's concern. The hotline will meet ADA accessibility standards. The recordings are to be

[2] These questions are from "Appendix B: Consumer Satisfaction Questions" in the Home Energy Rebates Programs Requirements and Application Instructions.

stored for processing and to ensure that the information provided by the customer is available to best resolve the issue.

- The state will leverage the {DESCRIBE SOFTWARE, TOOL, OR PROCESS: (E.G., CUSTOMER RELATIONSHIP MANAGEMENT (CRM) TOOL)} to record and track consumer feedback. The reporting system will capture relevant information such as the name of the associated party, contact information, and location, as well as any submitted documentation related to the issue including photographs and PDF document uploads.
- The state understands the importance of consumer feedback and will provide consumers with an option to complete a customer satisfaction survey no sooner than three (3) months post project completion. The survey will be inclusive of, and not limited to, the questions listed in this document's Appendix A: Consumer Satisfaction Questions.
- As part of the customer application process, the state will inform customers that they will receive a survey three (3) to six (6) months after project completion and ask customers how they wish to receive the survey (via an email invitation, a text message invitation, by a phone call, or by receiving a survey through the U. S. mail which would include a prepaid postage return envelope for their survey submission). No additional attempts for survey collection will be made after six (6) months.
- Consumer feedback and survey responses will be regularly reviewed for negative comments and addressed with the affected contractors, aggregators, eligible entity representatives, distributors, and/or retailers during virtual or in-person program meetings within the appropriate timeframe based on the predetermined priority (e.g., P1 =24 hours, P2 = 48 hours, P3 = 1 week). Feedback to program administrators will be shared through email communications, regularly scheduled meetings (e.g., weekly, bi-weekly check-ins), or phone calls.
- Pending the severity and/or volume of the comments, the contractor will be placed on a performance plan or receive additional Quality Assurance (QA)/Quality Control (QC) training until their performance is satisfactory.
- Consumer feedback will follow improvement processes as indicated in theContinuous Improvement section within this document to ensure feedback is incorporated into the next program rollout cycle.

Multifamily-Specific Requirement or Process:

The state will provide details regarding a discrete consumer feedback process and corresponding directions for those households who reside in a multifamily building, but who are not the direct program participant. Those non-direct participant households may have feedback related to quality assurance and should be provided with the opportunity to convey feedback.

Resolution Procedures: Requirements

To meet the requirements for the Resolution Procedures element, a state must include:

- A written conflict resolution procedure that documents how disputes will be resolved between homeowners/building owners and contractors/aggregators/eligible entity representatives. The procedure shall include protocols for a timely response, identification of responsible parties, documentation of corrective actions, results, and a means of identifying and addressing systemic issues.

- A remediation process to ensure that when deficiencies are detected through the inspection process, these results are communicated to the responsible party and any remedial or punitive actions taken follow a pre-defined set of protocols, which must be described in the plan. States must describe the specific remedies and penalties for deficiencies or unfair business practices that it will utilize in its rebates program if fraud or unfair business practice is detected or if an inspection finds improper installation of a rebate funded measure. At minimum, the remedies included for the program must make a consumer whole and provide some measure of deterrence against unacceptable practices.
- A requirement to maintain records on QC inspections including sampling rates, findings, corrective actions taken, and verification of conformance to requirements.
- Contracts cannot contain mandatory arbitration clauses.
- Ensure inclusion of the holder-in-due course rule so consumer protections are not lost just because the contract is assigned to a third-party creditor.

Resolution Procedures: Sample Response

- The state will name a program ombudsman or similar role with responsibility to create a template to formally report and record conflicts or disputes between homeowners and contractors, or aggregators. The form will include, but not be limited to, the identification of responsible parties, a description of the incident including the date and project address, and the resolution tactics inclusive of corrective actions taken.
- The incident will be escalated to the appropriate parties via email, regularly scheduled check-ins, or ad hoc meetings/phone calls for a timely response to address any identified systematic issues. For transparency, the defined conflict resolution procedure, and Service Level Agreements (SLAs) must be acknowledged and agreed upon by all parties prior to commencement of engagement in the scope of work related to the conflict. [ENTER STATE NAME] will develop and maintain a standard remediation process which can be applied to each third-party agreement. When deficiencies are detected through the inspection process, the results will be recorded, communicated, and shared to the responsible party within [ENTER TIMEFRAME (E.G.,1 WEEK)]. Any remedial or punitive actions taken will follow a pre-defined set of protocols as follows:
    - A record of deficiency
    - An assessment of the level of severity regarding the issue related to the project inspection
    - Determination of remedial or punitive action in accordance with the severity of deficiency by the appropriate parties. (e.g., program implementer)
    - Formal communication to the responsible party

    - Fulfillment of remedial or punitive action, including state verification of conformance to requirements

- The state will also establish an investigation process for fraud allegations against any program participant, be it a contractor, customer, distributor, retailer, or any other participant. Part of this process is to also include the details of punitive consequences that may include fines, removal from future eligibility to participate in the program, as well as possible criminal charges.
- The state will maintain records on QC inspections including sampling rates, findings, corrective actions taken, and verification of conformance to requirements. These records will be retained in accordance with the state's standard record retention policies for a period of [ENTER TIMEFRAME (E.G., 7 YEARS)].
- Contracts associated with Home Efficiency Rebates (IRA Section 50121) and Home Electrification and Appliance Rebates (IRA Section 50122) will not contain mandatory arbitration clauses.
- The state will ensure the inclusion of the holder-in-due course rule included in contracts associated with Home Efficiency Rebates (IRA Section 50121) and Home Electrification and Appliance Rebates (IRA Section 50122), so consumer protections are not lost if the contract is assigned to a third-party creditor.
- The state shall design a process to record and investigate allegations of fraudulent activity by contractors, customers, or other program participants. Details of any investigations are to be maintained for use in the future as needed.
- If an allegation of fraud is made against a contractor, the state will follow its process to investigate, resolve, and as necessary assess punitive consequences. This may be of a progressive nature stemming from multiple incidents, or it may result in a contractor being removed from the approved contractor list for the program. Penalties may be financial, administrative, or criminal, depending on the nature of the issue.

Data Review: Requirements

> To meet the requirements for the Data Review element, a state must include a requirement for the state to conduct data or file review of all projects that verifies at a minimum[3]:
>
> - A process for confirming that auditing tools and modeling software have basic data validation controls on inputs to ensure data quality.
> - The home assessment gathered the data required for each specific rebate.

[3] For further detail on this and other program requirements, see Home Energy Rebates (IRA Sections 50121 & 50122): Required Elements of a Consumer Protection Plan, which can be accessed at https://www.energy.gov/scep/articles/home-energy-rebates-inflation-reduction-act-sections-50121-50122-required-elements.

- For the Home Efficiency Rebates (IRA Section 50121), home assessment requirements are listed in Appendix B: Home Assessments for Home Efficiency Rebates of this document.[4]
- For the Home Electrification and Appliance Rebates (IRA Section 50122), home assessment requirements listed in Appendix C: Home Assessments for Home Electrification and Appliance Rebates of this document. Note that home assessments are only required for qualified electrification projects that include an electric heat pump for space heating and cooling.

- The contracted scope of work was specified consistent with program requirements.
- The address of the installation matches the address on the rebate coupon.
- Rebate amount aligns with verified income category, if applicable.
- For Home Efficiency Rebates, the household was provided the Post-Installation Certificate as specified in Appendix D: Post-Installation Certificate of this document. (Home Electrification and Appliance Rebates do not need this certificate.)

A state must also include a requirement that program implementers retain all project data that is required as part of the Data & Tools Requirements Guide. These data points include, but are not limited to:

- Post-installation photos of major upgrades / the equipment included in each qualified electrification project for all homes.
- Proof of combustion safety testing on fossil fuel equipment in all homes where fossil fuel systems have been impacted by the installation.
- Proof of commissioning testing on HVAC equipment in all homes where HVAC systems are installed.

Finally, a state must include the following in its Data Review section:

- A requirement to maintain records on QC inspections including sampling rates, findings, corrective actions taken, and verification of conformance to requirements.
- A description of the training or credentials of the personnel conducting the data/file review.

Data Review: Sample Response

{States are encouraged to develop requirements for business processes and procedures to be documented within formal business process design documentation. Documentation should include a flow diagram and a trackability matrix specifying information collection system requirements. These documents will specify the contact information for the responsible party and expectations for how and when the state will conduct data reviews and enforce compliance with program requirements. States are encouraged to leverage digital platform solutions with built-in validation checks for data fields and document uploads.}

[4] The Home Energy Rebates Data & Tools Requirements Guide can be accessed at https://www.energy.gov/scep/articles/ira-home-energy-rebates-data-and-tools-requirements-guide.

The state is to conduct data or file review of all projects that verify:

- **Data Validation Controls:** The state will investigate systems that can use "smart" technology to automatically read uploaded documents for income verification and/or other purposes. For example, the state would like to use a system (if not cost-prohibitive) that accurately reads the applicant's information including address on enrollment cards from various categorically eligible programs. The state will utilize existing, if appropriate, or investigate new tools and software to ensure that data validation controls such as exception handling and file processing error alerts are in place. The state will develop an exhaustive list of requirements that the tool must meet. Additionally, the state will outline business procedures to address data exceptions and train the appropriate staff for timely resolution and documentation.
- **Home Assessment Data:** The state will randomly select a statistically significant number of home assessments to conduct [ENTER TIMEFRAME (E.G., MONTHLY)] data audits to ensure all required data listed in Appendix E: Education and Outreach is captured. Additionally, the state will follow the standardized data specifications and guidelines within the IRA Home Energy Rebates: Data And Tools Requirements Guide for data captured within the assessment to ensure data compatibility. Home energy assessment data for large multifamily buildings will be consistent with Building Sync.
- **Scope of Work Requirements:** That state will develop a standardized scope of work template for implementers consistent with program requirements to ensure program requirements are met. The state will require the implementers to use this template to capture necessary information and provide guidance on program requirements. On at least an annual basis (but no sooner than after 12 months of data has been received on at least [ENTER NUMBER: X] homes), the state will review at least [ENTER NUMBER: X] invoices for work performed to confirm the invoices are sufficiently detailed and the rebates are consistent with current program measures and equipment eligibility requirements (e.g., equipment types and model numbers listed on the invoice are eligible for rebates under Home Energy Rebates programs).
- **Installation Address Verification:** The state's preferred method of installation address validation is by geo-locational data. Locational data could additionally be captured through various mean such as GPS, or within photo/image locational meta data. If unavailable, the state will require additional proof of address through documentation such as utility bill submission. The state will require acknowledgement that installation was performed at the claimed installation address by the contractor via a signed and dated installation confirmation document (e.g., invoice). The state plans to randomly select and conduct quality assurance on [ENTER NUMBER: X%] of all claims submitted for the first year. Through this quality assurance process done remotely or in person, the state will verify what equipment was installed and where it was installed. If more than [ENTER NUMBER: X%] of the randomly selected claims prove to be accurate, then the state may choose to decrease the percentage of randomly selected claims downward over time.

- **Income Category Verification:** Program implementers will ensure the rebated amount aligns with the verified income category for low-income rebates by requiring a submittal of the proof of income for each rebate issued. The state will verify the documented proof of income by requesting updated income data from source systems/qualifying programs listed in the Tables within Appendix F: Federal Programs Approved for Categorical Eligibility. The state will conduct an [ENTER TIMEFRAME (E.G., ANNUAL)] audit of associated rebate dollar allocations.
- **Certificate Receipt:** The program implementer will confirm consumer receipt of the certificate as specified in Appendix D: Post-Installation Certificate by obtaining data such as email send confirmation, home/building owner signature, and/or a photographic proof of certificate displayed in the window of the building in which the work was performed etc.

Additionally, to assure and document safety and quality control for each project the state will retain:

- **Post-Installation Photos:** The state will retain photos of rebated appliances post installation. The associated EnergyGuide label for installed appliances and technologies must also be captured. The state will use [ENTER SOFTWARE OR PROCESS] to leverage meta data to verify location, date, and accuracy of image. {DESCRIBE ADDITIONAL POST-INSTALLATION VALIDATION PROCESS AND PROCEDURES} Program Implementers will retain photos of major upgrades for all homes accordance with standard record retention policies, for [ENTER TIMEFRAME (E.G., 7 YEARS)].
- **Proof of Combustion Safety Testing:** The state will require testing sign off by a qualified contractor that the fossil fuel equipment meets the performance requirements. The program's implementers will retain proof of combustion safety testing on fossil fuel equipment in all homes where fossil fuel systems have been impacted by the installation accordance with standard record retention policies, for [ENTER TIMEFRAME (E.G., 7 YEARS)].
- **Proof of Commissioning Testing:** The state will require submission of commissioning testing proof in all homes where HVAC systems are installed.
    - For each project, the contractor or eligible entity representative (EER) must provide documented proof of testing and results signed by the homeowner or building owner as required by the program. The state will investigate commissioning systems and tools that may be utilized by participating contractors in the future. Program implementers will retain proof of commissioning testing on HVAC equipment in all homes where HVAC systems are installed in accordance with standard record retention policies, for [ENTER TIMEFRAME (E.G., 7 YEARS)].

Finally, to assure and document quality control for each contractor the state will:

- Require the third-party contractor responsible for the on-site QC on the first assessment completed by each newly onboarded contractor to provide their findings within [ENTER TIMEFRAME (E.G., 30 DAYS)] of assessment. The state will maintain record of QC inspections including sampling rates, findings, corrective actions taken, and verification of conformance to requirements in accordance with standard record retention policies, for [ENTER TIMEFRAME (E.G., 7 YEARS)].

- Conduct the data/file review [ENTER TIMEFRAME (E.G., MONTHLY)] on [ENTER NUMBER: X%] of rebated projects inclusive of do-it-yourself (DIY) projects that involve purchases at retailers. In the event there is an anomaly, discrepancy or exception in the data that indicates potential fraud, waste, or abuse, the state will follow data validation processes and procedures to investigate. Post install onsite inspections may be warranted and further actions may be taken to rectify the issue.
- Assign [ENTER ROLE, TITLE, COMMITTEE, OR DEPARTMENT (E.G., THE DEPARTMENT OF PUBLIC SERVICES, OFFICE OF ENERGY SYSTEM PLANNING AND PERFORMANCE)] the responsibility of conducing the data/file review. Qualifications for the person(s) that will be tasked with such responsibilities will be as follows: bachelor's degree or equivalent experience, the Home Energy Professional (HEP) Quality Control Inspector certification, and completion of identified yearly compliance training.

Onsite and Virtual Inspections: Requirements

A state must include the following requirements in their plan related to home inspections for projects that received a home assessment (this includes all Home Efficiency Rebate projects and all Home Electrification and Appliance Rebate projects that include an electric heat pump for space heating and cooling):

- A requirement to conduct independent onsite post-install inspections on a minimum of:
  - The first five (5) projects of new contractors / contracting organizations; and
  - Five percent of projects thereafter for each contractor (provided no issues are found).
- A description of the training, credentials, and/or qualifications that the state will require of independent inspectors, and identification of how these qualifications do/do not align with those included in a state's IRA Section 50123 Contractor Training Grants program.
- A documented onsite inspection protocol that shall include a minimum of:
  - A visual inspection of the site and work conditions.
  - Verification that the installed measures match the contracted scope of work and any change orders have been appropriately documented.
  - Verification that diagnostic test results are accurate (may be directly observed if the inspector is present at the time of testing or repeated by the inspector).
  - Ensures compliance with E-Sign or prohibits the use of electronic devices and signatures to enter into the contract if not E-Sign compliant.[5]

[5] A written copy (in the person's primary or secondary language) should be provided even if there is also an electronic contract.

States may elect to conduct virtual post-install inspections instead of onsite inspections. If used, the plan must also include:

- A description of the methods used (e.g., video recording, interview with the site contact, photos taken during the virtual tour)
- A description of how installed equipment will be assessed
- A list of the additional information required, such as submitted project documentation (invoices, specification sheets, and calculation models)
- Requirements for qualifying virtual inspectors
- The tools and platforms that will be used for the virtual inspection.
- A description of privacy agreements

If program participants decline virtual recording of their home, an onsite inspection must be used.

Onsite and Virtual Inspections: Sample Response

{ADDRESS THE STATE PLANS TO PURSUE ONSITE AND/OR VIRTUAL INSPECTION APPROACH IN FULFILLMENT OF THE REQUIREMENTS FOR POST-INSTALL INSPECTION.}

- {DESCRIBE THE ONSITE INSPECTION APPROACH:} The state will work with a third party such as local building inspectors to conduct independent onsite post-install inspections {DESCRIBE THE PROTOCOL IN THE EVENT PROGRAM PARTICIPANTS DECLINE VIRTUAL RECORDING OF THEIR HOME}. The selected third party (e.g., local building officials) will be required to meet the minimum standard accredited certifications such as BPI Quality Control, Certified Building Safety Inspector (BSI), or a Certified Code Enforcement Official (CEO) to ensure adherence to the appropriate federal and state home/building regulations. {LIST CERTIFICATIONS THAT PERTAIN TO THE STATE.}
- The state will define and document a process for coordination of inspections with the third-party inspection entity and relevant contractors. The independent onsite post-install inspections will be conducted in a timely manner (e.g., will be conducted immediately at the culmination of installation, not take longer than one (1) hour) and coordinated in conjunction with the home/building owner/manager to avoid imposition and an unsatisfactory consumer experience. The third party will be required to inspect a minimum of the first five (5) projects of new contractors and five percent of projects thereafter for each contractor (provided no issues are found). If issues are found, the state will process with the appropriate actions as specified in Resolution Procedures section within the document.
- To counter potential incidents of fraud in inspecting five percent of projects by a given contractor, the state will inspect as diverse a collection of projects as feasible. This diversity may stem from geography, type or magnitude of energy savings measures installed, different installers from the same contracting firm, and other variables as deemed practical.

- The state will keep records of the projects inspected, including the storage of all related documentation and pictures.
- Onsite inspection protocol will be developed in coordination with state, county, and town building inspection agencies and will include, at a minimum:
    - A visual inspection of the site and work conditions.
    - Documentation and of inspection as required for proof within the Data Review section within this document.
    - Verification that the installed measures match the contracted scope of work and any change orders have been appropriately documented.
    - Verification that diagnostic test results are accurate (may be directly observed if the inspector is present at the time of testing or repeated by the inspector).
    - Compliance with E-Sign or prohibit the use of electronic devices and signatures to enter into the contract if not E-Sign compliant.[6]
- {IF ELECTING TO CONDUCT VIRTUAL INSPECTIONS, DESCRIBE THE VIRTUAL INSPECTION APPROACH:} The state will partner a third party to conduct virtual post-install inspections (e.g., local building officials). The state proposes to use the [ENTER NAME OF SOFTWARE] methodology which follows the Recommended Practices for Remote Virtual Inspections (RVI) developed by the International Code Council (ICC) and will coordinate with DOE for review and approval which the state believes fulfills all virtual post-install requirements including privacy agreements.
- Any allegations of fraudulent activity from a virtual inspection are to be dealt with in the same manner as for the process for onsite inspections.
- Failed onsite and virtual inspections will be reported to contractors and program implementers. Contractors will be required to remedy the issues found within [ENTER TIMEFRAME (E.G., 30 DAYS)] at no additional cost to the home/building owner (consumer). The remedied install will then require another inspection.

Multifamily-Specific Requirement or Process:

The state will provide instructions for virtual inspections processes for homeowner consumers, or multifamily building owners, as this will impact the way inspections and virtual inspections are carried out.

Contractors and Other Partners: Requirements

> A qualified contractor list is a required element of a state's Consumer Protection Plan. For both Home Efficiency and Home Electrification and Appliance Rebates, states must:
>
> - Describe how the program will initially develop the qualified contractor list.

[6] A written copy (in the person's primary or secondary language) should be provided even if there is also an electronic contract.

- Describe which qualification(s) that contractors will be held to, potentially including but not limited to home performance industry credentials, training requirements, business insurance and licensure, skills standards, and labor standards.
- Describe how the state will perform due diligence on contractor and distributor entities that will be on their lists and how they will prevent the listing of fraudulent or illegitimate entities.
- Describe the process by which contractors will be added to the qualified contractor list, including how implementers will review and consider contractors trained under IRA 50123.
- Describe the conditions that would lead to a contractor being delisted and the process by which a contractor would be delisted.
- Make the qualified contractor list public and include a description of how consumers applying for rebates will be informed on how to use the list to access a qualified contactor.

For the Home Efficiency Rebates, a state must also:

- Describe how the state program will ensure energy savings are calculated using allowable methods according to the IRA 50121 statute language, including how approved tools/software will be identified, and how contractors will be alerted to these tools and trained on proper use.
- Describe how the state will educate contractors and building owners to invest in envelope improvements before investments are made in mechanical equipment.

For the Home Electrification and Appliance Rebates, a state must also:

- Require that the following technologies be installed by a contractor on the qualified contractor list:
    - Electric heat pump for space heating and cooling
    - Air sealing
    - Electrical wiring
    - Electrical load service center
- Establish a qualified retailer and distributor partnership list and describe how the program will initially develop the qualified retailer and distributor partner list.
- Describe the requirements to which these partners will be held, including, at a minimum, the following:
    - Listed partners must make available for sale eligible appliances for qualified electrification projects.
    - Listed partners have systems capable of providing rebates for qualifying equipment rebates.
    - Listed partners commit to submit rebate request to the implementer(s).
- Describe the process by which retailer and distributor partners will be added to the qualified contractor list and the conditions that would lead them to being delisted.

Contractors and Other Partners: Sample Response

- The state will partner with electric and gas utilities as well as sanctioned state agencies to develop a qualified contractor list. {DESCRIBE THE DIFFERENT TYPES OF CONTRACTORS, FOR EXAMPLE, CONTRACTORS FOR THE PROGRAM MAY INCLUDE BUT NOT LIMITED TO: INSTALLERS, ENERGY AUDITORS, CONSULTANTS, ENGINEERS, APPLIANCE VENDORS, AND SERVICE PROVIDERS, AND INSPECTORS.} The state understands that these entities may have developed comprehensive vetting processes to ensure contractors are highly qualified, hold active certifications and offer consumers reputable services. The contractors must also meet licensing, insurance, and labor standards to qualify for associated program enrollment.
- The state will perform due diligence on contractor and distributor entities that will be on their qualified contractor lists to prevent the listing of fraudulent or illegitimate entities. This may include investigating consumer complaints, checking against databases such as the "Do Not Pay" list or matching the business credential against state business entity lists or other available public records to ensure that the business addresses are legitimate.
- The state will work with the appropriate IRA 50123 program implementation teams to review and include contractors for consideration who are trained under an IRA 50123 funded initiative. Additionally, the state will conduct outreach campaigns to contractors that have completed the training under IRA 50123 to apply for inclusion on the qualified contract list. {THE STATE IS ENCOURAGED TO INCLUDE APPLICABLE INFORMATION REGARDING ANY HOME ENERGY EFFICIENCY CONTRACTOR TRAINING GRANT PROGRAM THE STATE MAY SUPPORT. THIS COULD INCLUDE THEIR IRA 50123 APPLICATION PLAN OR ANY NON-50123 STATE- HOME ENERGY EFFICIENCY CONTRACTOR TRAINING GRANT PROGRAM WITH A FOCUS ON A DIVERSE ENERGY EFFICIENCY AND CONTRACTOR WORKFORCE. THE STATE SHOULD PLAN TO FOLLOW REQUIREMENTS IN ACCORDANCE WITH ALL SUCH PROGRAMS, WHETHER 50123 OR NOT.

  THE STATE SHALL DESCRIBE PLANS TO ACTIVELY PROMOTE AND PERFORM AN OUTREACH CAMPAIGN TO CONTRACTING FIRMS THAT ARE A MINORITY, WOMAN, DISABLED, OR A VETERAN OWNED BUSINESS. DESCRIBE HOW SUCH A RECRUITING PLAN WOULD BE DEVELOPED AND EXECUTED, HOW SUCH FIRMS WILL BE PUBLICIZED OR LISTED ON THE STATE'S QUALIFIED CONTRACTOR LIST, AND PERIODICALLY PRESENT INFORMATION ABOUT WHAT PERCENTAGE OF CONTRACTORS ON THE QUALIFIED CONTRACTOR LIST ARE REPRESENTED BY THESE CLASSES, AND WHAT PERCENTAGE (BY COST) OF PROJECT WORK IS PERFORMED BY SUCH CONTRACTING FIRMS.

  THE STATE SHALL INCLUDE PLANS TO SUPPLEMENT RECRUITING EFFORTS TOWARDS MINORITY, WOMAN, DISABLED, OR VETERAN OWNED CONTRACTING FIRMS BY OFFERING ASSISTANCE RELATED TO TRAINING OR CERTIFICATION NEEDS AS DEEMED NECESSARY IN ACCORDANCE WITH THE STATE-BASED HOME ENERGY EFFICIENCY CONTRACTOR TRAINING GRANT PROGRAM. THIS WOULD INCLUDE APPRENTICESHIP PROGRAMS FOR WORKFORCE DEVELOPMENT, ESPECIALLY IN LOW-INCOME COMMUNITIES.}
- Contractors who no longer meet the minimum requirements and standards in accordance with the associated programs will be delisted. This includes but is not limited to contractors that have received complaints, and/or negative feedback as listed in Consumer Feedback and/or failed to comply with processes defined with the section

Resolution Procedures no more than three (3) times. It may also include instances where the contractor is found to have committed some type of fraud against the program. The contractor will be removed from all associated listings on all digital channels and printed material. The contractor will also no longer be allowed to tout or promote the ability to contract work on behalf of the Home Efficiency Rebates (IRA Section 50121) or Home Electrification and Appliance Rebates (IRA Section 50122) programs.

- The qualified contractor list will be publicly available on the state's website [ENTER WEBSITE] and hard copy upon request. The list will include a description of how consumers applying for rebates can use the list to access a qualified contractor. The state, any utility, or any program implementer is not to recommend any specific contractor to a customer, or via any marketing material. The state will also provide consumers with a hotline to address inquiries related to the qualified contractor list. It will also provide a hard copy of this information upon request.
- The state will educate contractors and building owners to prioritize investment in envelope improvements that have the greatest impact such as air-sealing and insulation to reduce air leaks, thus reducing costs. These materials and communications will reference the [DOE Better Buildings Solution Center] and will be included as content and activities within the programs overarching plan for Outreach and Education (Appendix E within this document).
- The program implementers will partner with the federal ENERGY STAR program to develop a list of qualified distributors and retailers of energy savings products and services. It is understood that these distributors and retailers have been properly vetted and meet licensing, insurance, and labor standards to qualify for program inclusion.
- The distributors and retailers on the list will have the capability with their business systems to provide instant rebates to customers at the point-of-sale, in accordance with the rules and incentive amounts affiliated with the program. The approved retailer, distributor and contractor lists will serve as resource and not a recommendation or to advocate for a specific firm, service provider or business entity.
- The distributors and retailers will report on rebates issued on a [ENTER TIMEFRAME (E.G., MONTHLY)] basis to ensure program integrity measures are met and the DOE Rebate Tracking System is updated accurately.
- The program implementers will coordinate with the state to perform marketing and store operations quality reviews to ensure that processes are being executed in accordance with established rules and directives of the program. The program implementers will also work with the distributors and retailers proactively counter any instances or discourage incidents of fraud, waste, and abuse. If a distributor or retailer is found to have engaged in such activity, that firm will be subject to being delisted from the program along with other possible consequences.
- The state program will ensure energy savings are calculated as explained in response to the [ENTER STATE NAME]'s Home Efficiency Rebates Application:

"The state will be using the [ENTER NAME OF SOFTWARE] authorized for use by DOE that can determine and document weather-normalized energy use of a home or portfolio of homes before and after the implementation of home energy upgrades. The software can estimate energy savings based on the data and information collected in the home assessment and will define, calculate, and report energy savings for the purposes of the rebate threshold as kWh or kWh equivalent."'

- The state will alert contractors to these tools and train them on proper use by hosting in-person events, webinar and/or video style training series. The state will conduct formal outreach through email and other marketing materials to ensure contractors are aware of how to access and participate in training.

Installation: Requirements

To meet the requirements for the Installation element, a state must:

- Identify installation standards with which installers must comply, including at a minimum, standards designed to:
  - Ensure work complies with local and state laws, permits, codes, and industry standards.
  - Establish minimum quality installation standards for rebated technologies that ensure proper function of the equipment that is being installed.
  - Promote use of standardized and sequenced procedures for developing a detailed project scope of work.
- Establish processes to enforce installation standards, including QA processes that allow the state to verify and document whether installation standards have been met.
- Ensure that sales language and contract language are the same.

If financing is involved, a state must:

- Ensure an ability to repay determination that does not include projected savings from an energy report because expected savings may not materialize due to household and market developments.
- Ensure a disclosure and cooling off period.
  - Clear, written advance disclosures should be required, with a 7-day waiting period between the disclosure and the contract signing. This waiting period should only be removed in a personal emergency (see Truth in Lending Act rules on this), where the homeowner, in their own handwriting, describes the emergency and the need for the emergency work and their understanding that they are waiving the waiting period.
  - In non-emergency circumstances, there should also be a 3-day right to cancel after the contract has been signed (such that the work is not done during that period).

Installation: Sample Response

- The state will require program implementers to work with building inspectors to ensure installation compliance with local and state laws, permits, codes, and industry standards. Installers will be required to obtain the appropriate applicable permits as they pertain to the scope of work. Compliance will be enforced through post-install inspections as described in Onsite and Virtual Inspections which established partnerships with the relevant parties.
- The state will provide publicly available information and resources such as {ENTER QUALITY STANDARDS (E.G., ANSI/ACCA 9 QIVP (HVAC QUALITY INSTALLATION VERIFICATION PROTOCOLS))} for installers and consumers to ensure minimum quality installation standards for rebated technologies.
- As stated within the state's Home Efficiency Rebates Application. The state will instruct contractors to prioritize and integrate improvements that have the most significant impacts on greenhouse gas reductions and/or grid reliability into their scopes of work where feasible and sensible (e.g., not cost-prohibitive, improvement measure does not lead to higher energy bills). The state will provide consumers and installers resources such as {ENTER RESOURCES (E.G., RETROFIT DECISION TOOL | BUILDING AMERICA SOLUTION CENTER (PNNL.GOV)} to promote use of standardized and sequenced procedures for contractors and installers as guidance for building their scopes of work.
- The installer shall provide evidence of the following: a) Equipment performance information; and b) Written job documentation or checklist inclusive of applicable testing results for the installation or procedures approved by the building inspector. The state will analyze a statistically significant sample or [ENTER NUMBER: X%] of installations on an [ENTER TIMEFRAME (E.G., ANNUAL)] basis for quality assurance purposes.
- The state will provide a contract template for installers and contractors to use. Installers and contractors will be required to provide program implementers with their standard contract agreements for review if they do not use the contract template provided by the state to ensure sales and contract language are the same. The state will provide approved templates, guidelines, outreach, and marketing (sales) content for contractors to use. This will be available by emailing the state at [ENTER CONTACT INFORMATION] or by downloading it on the web [ENTER WEBPAGE]. Contractors must provide the state with collateral samples for review to ensure compliance where co-branding with the state Home Energy Rebates program.

<u>If financing is involved:</u>

- Program implementers will complete a creditworthiness assessment on the borrower which does not include projected savings from an energy report to ensure the ability-to-repay by the agreed upon terms in the event expected savings does not materialize. Creditworthiness may be determined by proof of income, assets, employment, credit history and monthly expenses.

- [ENTER STATE NAME] will provide clear examples of accepted written disclosure language regarding a 7-day waiting (or cooling off) period. The state will also provide clear explanation to consumers of the 7-day waiting period between the disclosure and the contract signing.
- The state will include language that explicitly waives the waiting period only if a personal emergency has occurred for the homeowner (*see Truth in Lending Act rules on this).* The state will specify to consumers that in the event of a personal emergency, the homeowner will be required to, in their own handwriting or as transcribed and signed by the homeowner in wet ink signature, describe the nature of the emergency and the need for emergency work, as well as their understanding that they are waiving the waiting period. The lender will seek approval of the state concerning the waiver. The requisite 3-day right to cancel will not apply in emergency circumstances wherein the waiting period is waived.
- In non-emergency circumstances, the state will require lenders to abide by, and alert consumers of the 3-day right to cancel after the contract has been signed (such that the work is not done during that period). The state should clearly display right to cancel language on the contractual form, near the lender signature location.

  Example right to cancel language: "You, the buyer may cancel this transaction at any time prior to midnight of the third business day after the date of this transaction." (States should supply buyers with an attached notice of cancellation form for an explanation of this right).

Continuous Improvement: Requirements

Designing a program to achieve Continuous Improvement can prevent unfair business practices and addressing poor program functions that are not optimized for a positive consumer experience. To meet the requirements for this element, a state must:

- Identify what proactive steps the state will take to identify fraud, waste, or abuse.
- Explain how the state will implement automation to identify problem areas with program performance.
- Explain how the state will measure and evaluate the success of its QA systems.
- Describe how the QA systems will inform program improvements.
- For Home Electrification and Appliance Rebates (Section 50122), describe how home assessment data and results will be verified for accuracy.
- Document roles and responsibilities associated with how the state will monitor the program's budget and financial performance to ensure that funds are being used efficiently and effectively.

Continuous Improvement: Sample Response

{THE STATE SHALL EMPHASIZE HOW FRAUD, WASTE AND ABUSE WILL BE MITIGATED AND HOW THEIR PRACTICES WILL BE STRENGTHENED BY LEVERAGING ONGOING INSIGHTS THROUGHOUT THE DURATION OF THE PROGRAM. THE STATE SHALL DESCRIBE THEIR PROCESSES TO INFORM PROGRAM IMPROVEMENTS TO PROTECT CUSTOMER SATISFACTION THROUGH PROGRAM INTEGRITY.}

- **Unfair Business Practices:** The state will implement a system for preventing unfair business practices and avoiding or addressing poor program function that does not optimize a consumer's experience by:
  - Proactive prevention of and identification of fraud, waste, or abuse:
    - The state will follow the guidelines within the IRA Home Energy Rebates: Data & Tools Requirements Guide to collect the appropriate data, such as the utility account number, to ensure compliance with established limitations on the rebate allowance per consumer.
    - The implementer will be required to use the DOE Rebate Tracking System to ensure effective issuance of rebates, eliminate or dramatically reduce the possibility of duplicating rebates, and allow effective flow of information to the users as well as to our state, our implementer and DOE.
    - The state will ensure third party entities, vendors (e.g., software vendors) and contractors meet the specified qualifications in accordance with the work they will perform. Third parties and contractors will be required to submit a plan for responding to incidents, which will include investigating the cause and scope of the breach, securing data and possible certain notifications of affected persons, government officials and others. Third parties and contractors will also be required to provide Proof of substantial Cyber Security Insurance and Liability Insurance. Additional considerations will be given to B-Corp accredited entities.
    - The state will provide a hotline and contact form for consumers to anonymously report instances of suspected fraud, waste, or abuse. The hotline and contact form will be made available to meet accessibility standards as well as the needs of non-English language speakers.
    - The state investigator will complete the investigation and issue a report of investigation by the 60th day after the complaint is received by the state, unless it is deemed permissible, for good cause, to extend the investigation for no more than 30 days. An analysis will then be prepared and inclusive of recommended actions.
- **Leveraging Automation**:
  - Program implementers will utilize a standard agreed upon data model to leverage Application Programming Interface (APIs) where available, automated secure data file transfers, and error handling alert mechanisms where applicable to ensure consistency, data accuracy, and minimize errors.
  - The state will leverage a business intelligence reporting application to analyze data procured from consumer feedback efforts to identify problem areas with program reporting. This system will also provide insight into the realization of benefits as the program advances.

- **Realizing Performance with Measurement and Evaluation:**
    - The state will measure and report against targets such as the number of open tickets, frequency of data errors, and system performance metrics on a [ENTER TIMEFRAME (E.G., MONTHLY)] basis. These indicators will provide the state with insights into program success rates and signal areas of improvement.
    - The state will continuously monitor and evaluate to ensure continuous mitigation of fraud, waste, or abuse.
- **Program Improvement:**
    - The state will define, manage, and follow program improvement processes in conjunction with leadership, program implementers, and applicable parties.
    - Subject matter experts will analyze findings within the sectionsData Review and Consumer Feedback to be shared on a regular [ENTER TIMEFRAME (E.G., QUARTERLY)] basis.
    - Program implementers and other third parties will be required to acknowledge, evaluate, and provide a status on applicable improvement items.
    - Program improvements will be managed and quantified and prioritized according to a defined assessment criterion. {DESCRIBE SYSTEMATIC WAY OF AGGREGATING DATA SUCH AS LEVERAGING A TICKETING SYSTEM (E.G., AUTOMATED QA PROCESS WILL AUTOMATICALLY CREATE TICKETS FROM EMAIL INQUIRIES).}
    - The state will provide the DOE with [ENTER TIMEFRAME (E.G., QUARTERLY)] updates on improvement opportunities and implementation plan.
- **Budget and Financial Performance:**
    - In terms of ensuring that administrative limits are maintained, the state will closely track and report spending annually at a minimum. The state has assigned [ENTER ROLE, TITLE, COMMITTEE, OR DEPARTMENT (E.G., THE DEPARTMENT OF PUBLIC SERVICES, OFFICE OF ENERGY SYSTEM PLANNING AND PERFORMANCE).] the responsibility of governing and monitoring the program's budget and financial performance to ensure that funds are being used efficiently and effectively.
    - Guardrails will be put in place to meet Justice40 requirements and ensure that the funding does not primarily benefit wealthier households.
    - Program limits/budgets will be communicated to participants ahead of time and at regular intervals to give direction on how market actors and customers can continue to be supported if/when program funds are exhausted {DESCRIBE ADDITIONAL COMMITTEE OR ROLE'S RESPONSIBILITIES, GUIDELINES, ETC.} The state will leverage the DOE approved Budget Allocation Calculator in additional to following Generally Accepted Accounting Principles (GAAP) and conduct audits every [ENTER NUMBER: X] years. {DESCRIBE YOUR ACCOUNTING PRACTICES IN 1-2 SENTENCES}

Multifamily-Specific Requirement or Process:

Certain elements of the Consumer Protection Plan will require different processes for multifamily buildings than for single-family homes. Certain elements of the Consumer Protection Plan will require different processes for low-income, renter-occupied multifamily buildings and single-family homes versus owner-occupied dwellings. In regard to rebates allocated to low-income renter-occupied units, states must distinguish in their plans affordability restrictions and other tenant protections as well as how tenants will be notified of their rights relative to the landlord being required not to evict them and to agree to continue renting to low-income renters post-installation. states must distinguish in their plans which additional requirements will apply to multifamily buildings, including for central systems and for energy used by common areas that benefit individual renters through building-wide equipment (e.g., building-level ventilation and hot water systems) but that are not installed inside renter-occupied units.

Appendix A: Consumer Satisfaction Questions[7]

A DOE priority is that consumers have an overall positive experience with these state rebate programs and experience significant value from their participation. As such, DOE requires states to establish Consumer Protection Plans for their programs to ensure consumer satisfaction, as outlined in Section 3.2.5 and Section 4.2.5 of the [Home Energy Rebate Program Requirements and Application Instructions](). As part of the required Consumer Protection Plan, states must survey households on their experience at least 3 months and no more than 6 months after the project's completion date. This window is designed to allow time for bill payers and occupants to observe differences in their bills and/or comfort of their home. The table below displays the survey questions that states must include in their consumer satisfaction surveys.

Table 1: Consumer Satisfaction Survey Questions and Scale

Question	Scale
It was easy to understand the rebate requirements and provide the needed information	Scale: Strongly Disagree = 1, Strongly Agree = 5, (include "Don't Know" and "Not Applicable)"
It was easy to find a contractor/retailer	
The contractor/retailer provided a high-quality of service	
The rebate was a major reason for my purchase	
My new efficiency upgrades perform well	
My home is more comfortable than it was before the new efficiency upgrades	
My energy bills are lower since the new efficiency upgrades	
Overall, I am satisfied with my experience with the [Rebate name] program	
I would recommend this program to a friend or family member who could use it	
I plan to do more to save energy in my home because of my experience with this program	

[7] These questions are from "Appendix B: Consumer Satisfaction Questions" in the Home Energy Rebates.

Appendix B: Home Assessments for Home Efficiency Rebates[8]

Home assessments are an important component of consumer protection to better understand the potential risks and benefits to a household pursuing an energy upgrade project. Through observation and documentation of a home's pre-condition, consumers can make informed decisions to avoid upgrades that may not produce utility bill savings or may require additional upgrades to be safe and effective. Assessments also protect taxpayer funds from being spent on unallowable expenditures.

An assessment is required for every single-family home and multifamily building receiving Home Efficiency Rebates. State programs are required to establish basic requirements that ensure each home assessment:

- Complies with the steps and procedures for home energy auditing in accordance with ANSI/BPI 1100-T-2023 and ANSI/BPI 1200-S-2017, except that (1) a blower door test is not required as part of the audit and (2) the Cost Benefit Analysis is not required. If a Cost Benefit Analysis is performed, it shall be for consumer information only, must project total household energy consumption, and must, at a minimum, be presented in terms of reduced energy costs.
- Collects required information. Data requirements may differ depending on whether the project is deemed eligible through the modeled or measured energy savings program paths.
- At a minimum, the home assessor must collect and/or produce the following data points:
    - Unique home identifier (e.g., address).
    - Dwelling type.
    - Performance/efficiency of the home and its components, materials (such as insulation), and systems (potentially including but not limited to equipment type, age, fuel source, efficiency level, R-value, air leakage rate, etc.).
    - Identification of existing equipment/materials/systems to be replaced.
    - Identification of new equipment/systems/materials being proposed for installation.
    - Estimated total project cost, defined as "[t]he total cost of all upgrades within a completed project invoice inclusive of any rebated amount."[9]
    - Identification of the tool/software used to produce the energy cost estimate.
    - Written acknowledgement from the consumer of the proposed project's estimated impact on household energy costs and consumption including estimate of the energy savings in dollars in year one based on current utility rates at the home.
    - Written acknowledgement from the consumer of the amount they will owe not covered by the rebates.

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8 This text comes from Section 3.2.2 of the Home Energy Rebates Requirements and Application Instructions.

9 Definition comes from Section 2.1 of the Home Energy Rebates Requirements and Application Instructions.

- Estimated Post-Retrofit Energy Consumption of the proposed project, calculated in a manner consistent with Section 3.2.4.1 on "Calculating Modeled Energy Savings" from the Home Energy Rebates Requirements and Application Instructions.
- Estimated energy savings attributable to the proposed project, calculated in a manner consistent with Section 3.2.4.1 on "Calculating Modeled Energy Savings" from the Home Energy Rebates Requirements and Application Instructions.
- Datapoints as required per the state's requirements to retain data in section 3.2.5 on "Consumer Protection through Quality Assurance." These include:
    - Post-installation photos of major upgrades for all homes.
    - Proof of combustion safety testing on fossil fuel equipment in all homes where fossil fuel systems have been impacted by the installation.
    - Proof of commissioning testing on HVAC equipment in all homes where HVAC systems are installed.
- All other datapoints listed as required in the Data & Tools Requirements Guide.

For each home energy upgrade receiving Home Efficiency Rebates, the state is required to retain the following documentation:

- List of the major upgrades, defined as "energy usage, equipment, technologies, and services related to heating and cooling, envelope, and water heating end uses," and additional upgrades included in the energy savings prediction.
- Gross project cost estimate
- Project estimated energy savings (kWh or kWh equivalent)
- Estimated household energy costs post-installation.
- Estimated amount of eligible rebate
- Certification from the assessor that all the above information was provided to the homeowner and resident (if different)

Note that completing home assessments for multifamily buildings will require a different process than for single-family homes. A state must establish processes for home energy assessments for multifamily buildings, including for energy used by common areas.

Appendix C: Home Assessments for Home Electrification and Appliance Rebates[10]

Home assessments are an important component of consumer protection to better understand the potential risks and benefits to a household pursuing an upgrade. For the Section 50122 program, home assessments in specific installations can ensure the consumer receives a quality installation. In addition, states must ensure that consumers are aware where certain qualified electrification projects (QEPs) could result in unintended consequences, including increased utility bills due to fuel switching.

As an initial matter, a state must identify a pre-defined set of home pre-condition(s) and/or scope of work scenario(s) that will constitute unacceptable risk of raising utility bills based on the State's rate structure, existing equipment and fuel type, and other relevant factors.

To mitigate these risks, states are required to conduct a limited home assessment for the installation of QEPs that include any of the following upgrades:

- Electric heat pump for space heating and cooling

A limited home assessments consists of, at a minimum:

- A recommendation of a properly sized unit recommended by a qualified contractor for HVAC.
- An onsite visual inspection of the existing condition of duct sealing for HVAC & envelope.
- If the upgrade includes a fuel switch, an estimate of utility bill impacts and written acknowledgement by the consumer.
- Written acknowledgement from the consumer of the amount they will owe not covered by the rebates.
- If the upgrade falls within one of the state's pre-defined set of home pre-condition(s) and/or scope of work scenario(s) that will constitute unacceptable risk of raising utility bills, an estimate of utility bill impacts and written acknowledgement by the consumer.
- Collection of the following data points:
  - Unique home identifier (e.g., address)
  - Dwelling type
  - Existing energy equipment/systems to be replaced, if any
  - New energy equipment/systems being proposed for installation.
  - All other datapoints listed as required in the Data & Tools Requirements Guide
  - Estimated total project cost, defined as "[t]he total cost of all upgrades within a completed project invoice inclusive of any rebated amount."[11]

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[10] This text comes from Section 4.2.4 of the Home Energy Rebates Requirements and Application Instructions

[11] Definition comes from Section 2.1 of the Home Energy Rebates Requirements and Application Instructions

A state may allow remote or virtual assessments in place of field-based assessments in specified cases with DOE approval.

For each limited home assessment conducted, the program is required to retain the following documentation:

- List of the upgrades in the QEP for which a rebate was applied.
- Gross project cost estimate.
- Estimated household energy costs post-installation.
- Certification that equipment proposed in the scope of work do not yet exist in the home (if not fuel switching).
- Estimated amount of eligible rebate.
- All other datapoints listed as required in the Data & Tools Requirements Guide.

DOE does **not** require a home assessment be completed for installation of qualified electrification projects that do not include installation of an electric heat pump for space heating and cooling.

For any qualified electrification project for which a home assessment is not conducted, a state program must retain geolocated photo(s) of the equipment being replaced to verify that the installation is allowable. For these projects, a state must also retain the following documentation:

- List of the upgrades in the qualified electrification project for which a rebate was applied.
- Gross project cost estimate.
- Certification that the type of appliance installed did not exist in the home (if not fuel switching).
- All other datapoints listed as required in the Data & Tools Requirements Guide.

Note that completing home assessments for multifamily buildings will require a different process than for single-family homes. A state must establish processes for home energy assessments for multifamily buildings, including for energy used by common areas.

Appendix D: Post-Installation Certificate[12]

For all Home Efficiency Rebate projects, states must provide a post-installation project certificate to the household that has been certified by a qualified third party to confirm quality monitoring and accurate valuation of the upgrade.

States must ensure a certificate:

- Is completed and certified by a qualified third party.
- Is provided to the household.
- Details the work performed, equipment and materials installed, projected energy savings or energy generation to support accurate valuation of the upgrade.[13]

States must establish guidelines to those issuing certificates to ensure that information provided is clear and incorporates DOE-required information in the certificate package prior to launch of its program.

[12] This text comes from Section 3.2.6 of the Home Energy Rebates Requirements and Application Instructions
[13] 42 U.S.C. 18795(b)(4)(A).

Appendix E: Education and Outreach[14]

A positive consumer experience begins with successful outreach and education about the benefits of the Home Energy Rebate programs. States must decide which types of households to target for outreach, what methods will be most effective in reaching them, and what educational materials will best inform those households of the benefits of upgrading their homes. States must also decide how they will engage contractors that will deliver the projects paid for by rebates. Many states will be able to leverage and repurpose outreach and education materials from existing programs.

A state must briefly describe its intended outreach and education strategy it will use to inform eligible households about the rebate programs. This outreach and education strategy must include a timeline and programmatic elements, potentially including but not limited to targeted advertising, outreach via local governments, and/or partnerships with community-based organizations. States may allocate a portion of their administrative budgets to conduct these activities.

At minimum, a state's outreach and education strategy must include:

- A brief description of planned activities for household outreach, such as:
    - Outreach partnerships (utilities, local governments, community-based organizations, labor unions, churches, etc.)
    - Outreach channels (Digital ads, neighbor to neighbor outreach, direct mailings, etc.)
    - Educational materials (website, fact sheets, etc.)
- A brief description of planned activities for contractor outreach, such as:
    - Outreach partnerships (trade organizations, labor organizations, etc.)
    - Outreach channels (website, ads in trade organization publications, etc.)
    - Educational materials (website, fact sheets, trainings, etc.)
- High-level timeline for executing these programmatic activities.
- Estimated budget devoted to outreach and education, which can be covered through Home Energy Rebates[15] administrative funding or through other state/utility/local sources.

[14] This text comes from Section 3.2.1 and Section 4.2.1 of the Home Energy Rebates Requirements and Application Instructions.

[15] The term Home Energy Rebates is inclusive of both Home Efficiency Rebates (HOMES) and Home Appliance Electrification Rebates (HEAR).

Appendix F: Federal Programs Approved for Categorical Eligibility[16]

Table 2: Recognized Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Eligible for Higher Level of Home Efficiency Rebates
Low Income Home Energy Assistance Program (LIHEAP)	X
Medicaid	X
Supplemental Nutrition Assistance Program (SNAP)	X
Head Start	X
Lifeline Support for Affordable Communications (Lifeline)	X
Food Distribution Program on Indian Reservations (FDPIR)	X
National School Lunch Program – Free (NSLP)	X
Housing Improvement Program (HIP)	X
Housing Opportunities for Persons with AIDS	X
Supplemental Security Income (SSI)	X
Weatherization Assistance Program (WAP)	Automatically eligible ONLY if household is located in an area where 80% AMI (Area Median Income) is greater than 200% Federal Poverty Level (FPL)
WIC	Automatically eligible ONLY if household is located in an area where 80% AMI is greater than 185% FPL.
Other (programs approved by DOE through state application process)	States may propose other income verified programs for categorical eligibility in their applications. DOE will approve if those income criteria meet the Home Energy Rebates income criteria set forth in the Inflation Reduction Act.

[16] This text comes from Federal Programs Approved for Categorical Eligibility, energy.gov/sites/default/files/2023-10/ira-50121-50122-home-energy-rebates-categorical-eligibility-list_10-13-2023.pdf

Table 3: Recognized Housing Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Level of Categorical Eligibility for Rebates for Renters Receiving Housing Assistance	Whole Building Eligibility for Rebates
Public Housing (housing owned and operated by Public Housing Authorities)	Below 80% AMI	Single- and multi-family buildings owned and operated by Public Housing Authorities are fully eligible.
Privately owned multifamily buildings receiving project based assistance (Section 8, Section 202, Section 811)	Below 80% AMI	If at least 50% of housing units are subsidized through these programs, then the multifamily building is fully eligible.
Privately-owned multifamily buildings that house residents receiving tenant-based assistance	Below 80% AMI	If at least 50% of building occupants receive tenant based assistance, then the multifamily building is fully eligible.
Low Income Housing Tax Credit (LIHTC)	Below 80% AMI	If at least 50% of housing units are income-restricted, then the multifamily building is fully eligible.