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Introduction and Purpose

This Consumer Protection Plan (CPP) applies to the Oregon Department of Energy's Home Efficiency Rebates (HOMES) Program. The HOMES program will be implemented in partnership with Energy Trust of Oregon (Energy Trust) and a second implementer. This document describes how the program plans to accomplish the following consumer protection activities:

- Collecting and responding to consumer and community feedback
- Monitoring and resolving conflicts and complaints
- Reviewing project data for completeness and accuracy
- Creating and managing a network of qualified contractors
- Creating procedures and standards for installations and inspections
- Implementing a plan for continuous improvement

Contractors who apply to participate in the program will be provided with a copy of the plan and required to agree to comply with all applicable quality assurance and quality control (QA/QC) processes. The CPP will be readily accessible on the Home Energy Rebate programs' website, and it will be available in Spanish, Vietnamese, Chinese, and Russian, which are top four most common languages spoken by people in Oregon with limited English proficiency.ⁱ ODOE will make hard copies of the plan available through the mail upon request. Implementers and other partners will bring hard copies to events and trainings. ODOE will review the plan at least every two years and make adjustments based on lessons learned. ODOE will communicate changes to contractors, retailers, distributors, third-party inspectors, and U.S. DOE. ODOE will also provide U.S. DOE with information regarding the state's monitoring, review, and revision of the plan based on program performance. ODOE will retain records related to any QA/QC processes and will permit U.S. DOE to access the records upon request.

Consumer Feedback

Feedback Collection

Customer feedback will be obtained through multiple channels, including post-installation surveys; phone calls or emails; engagement with program staff and community-based organizations; and field staff directly interacting with contractors and customers. The program will track feedback to ensure problems are addressed and to inform continuous improvement activities. All customer feedback reporting mechanisms, documents, and other communications will meet ADA accessibility standards and will be available in other languages, as appropriate.

Tenants in multifamily buildings may provide feedback directly or through phone or email, and feedback will be addressed per the feedback response procedures, as described below. The programs' website will include a page that describes information specific to tenants in multifamily buildings wanting, applying for, or receiving a rebate. This will include information about submitting feedback or complaints and resolving conflicts. Building owners will be provided with a tenant information sheet that contains information about submitting complaints or feedback; building owners will be required to provide the sheet – either on paper or in an email - to any tenant impacted by an upgrade and post the notice in a public space of the building.

ⁱ <https://www.oregon.gov/languages/Pages/most-common-state-language.aspx>

Surveys

Customer Satisfaction Surveys will be sent to households at least three months and no more than six months after the project's completion date. The survey will ask households to respond to a series of statements on a 1-5 scale from strongly disagree to strongly agree, including "Don't Know" and "Not Applicable." The survey will also provide a text box for respondents to submit a written comment or expand on any of their responses. The survey will include the following statements:

- It was easy to understand the rebate requirements and provide the needed information.
- It was easy to find a contractor/retailer.
- The contractor/retailer provided high-quality 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 HOMES 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.
- I received a completion certificate along with other important information about my project.

During the application process, the building owner will be informed that they will receive a survey three to six months after project completion. After the survey is sent, if the recipient is non-responsive, the survey will be re-sent automatically up to two additional times. At least once per month, Oregon will review the aggregated responses to identify whether there is any indication of an issue that the program teams need to investigate and address. If a potential issue is identified, ODOE staff will communicate the issue to the individual or team responsible for continuous improvement activities.

Phone and Email

The Home Energy Rebate programs now have a dedicated email address (homeenergyrebates@energy.oregon.gov) for ODOE to collect and respond to questions, comments, and feedback. Customers may also call ODOE's main phone line (503-378-4040) to be connected to a knowledgeable staff person, based on the callers' needs. This information is available on the program website (<https://www.oregon.gov/energy/Incentives/Pages/home-energy-rebates.aspx>).

Once the program launches, individuals with complaints, comments, or feedback may contact ODOE or one of the program implementers. The website will provide contact information for the relevant implementer for anyone with questions or complaints about specific projects.

Direct Feedback

Program staff may receive feedback from contractors and customers while working directly with individuals in the field. Program staff will be instructed on how to identify the types of comments and feedback that require attention, and to collect and document all relevant information (including contact information for any follow-up communications).

Feedback Response Procedures

When feedback is received, the person documenting the feedback will be responsible for determining whether a response is required and ensuring the response is provided. Feedback will be categorized as

“comment,” “compliment,” and “complaint” or “negative feedback.” Negative feedback is defined as an inquiry or request in which the individual expresses dissatisfaction with some aspect of the program.

Negative feedback that requires a response, or complaints about specific projects, contractors, or other aspects of the program, will be handled and resolved through the process described in the [Conflict Resolution Procedures](#) section below. All feedback will be used to inform the periodic programmatic review process described in the [Continuous Improvement](#) section below.

Conflict Resolution Procedures

The program will use a tiered complaint management procedure to ensure an effective escalation pathway for customers. All complaints will be assigned a complaint level designation according to the severity of the complaint and its potential impacts. The complaint level depends on several factors, including the number of customers impacted, whether there are threats of legal action, the involvement of a state agency, and the risk of negative media attention. Complaint level determines which individuals or groups should address the complaint, be consulted, or be informed. It also determines the types of actions to be taken to address the complaint.

Complaint level 1 will apply to any communication in which a customer expresses dissatisfaction with some aspect of the program’s policies, customer service, contractors, website, forms, implementation staff, or other interactions. Level 1 complaints may be resolved by the first person to receive them. They are important to track as multiple, similar complaints may reveal trends that can be corrected.

Complaint levels 2-4 will apply when any complaint cannot be resolved at level 1. The choice of level designation will be determined by the type of complaint. Complaints are categorized as level 2 when the issue has been escalated to a manager at the customer’s request or the complaint expresses concern with a specific individual. Level 2 requests are escalated to level 3 when the complaint is not resolved to customer’s satisfaction at level 2 or the customer requests someone higher in the organization. Complaints are designated at level 4 when a customer threatens legal or law enforcement action; threatens to inform the media or legislators; or the complaint is forwarded by a legislator, state agency, or other key stakeholder. Complaints may be addressed by ODOE staff or the program implementers; complaint levels 3 and 4 will always be escalated to ODOE.

Table 1: Complaint Levels Defined

Level 1	Level 2	Level 3	Level 4
Customer can be satisfied by whoever receives the initial communication (i.e. call center, customer service representative, field staff, etc.)	Issue is not resolved at level 1, customer requests manager, or customer expresses specific concern with an individual	Concern is not resolved to customer’s satisfaction at level 2 or customer requests someone higher in the organization	Customer threatens legal or law enforcement action; threatens to inform the media, or legislators; or the complaint is forwarded by a legislator, state agency, or other key stakeholder

Each complaint will be systematically documented and assigned to a specific staff person who will be responsible for either resolving the complaint or reassigning it to another staff person, until no further action is required. The assigned staff person must initiate an initial attempt to resolve a complaint within

one week. If the staff person is not able to address the customer's concerns on their own, they may seek assistance from, or transfer the complaint to, someone else on staff, including someone at the manager level or higher (which would also raise the complaint level to 2-4). Unless staff establish other expectations with the complainant, any follow-up communications must be attempted within two weeks of the last communication, unless and until the complainant is unresponsive after three attempts have been made.

If necessary to resolve a specific complaint, the engaged staff person will contact the relevant individual or company to discuss the issue and attempt a resolution. The program will also continuously track complaint data to identify trends about a specific individual or company and will communicate corrective actions, as necessary, to any identified entities.

The program will leverage complaint reporting to update the Consumer Protection Plan or other internal monitoring protocols, as needed, to address violations and deter potential violators. This process is described in the [Continuous Improvement](#) section below. Program implementers will develop application exception criteria to ensure that customer projects that are disqualified due to incorrect installation or those that experienced fraud are made whole.

Data Review

The program implementers will be responsible for reviewing submitted application and project completion materials. Staff will receive thorough training on the program requirements as well as the application and project review process. Program implementers will develop training curriculum for project reviewers, which will include technical concepts and performance ratings for qualified equipment. Staff will be trained on the process for reviewing projects using business systems and procedures to contextualize and confirm the accuracy of information submitted. Examples include cross-referencing surface area treated by insulation applications with the square footage of the home treated; expected system capacity ranges for the volume of conditioned space; and how to read and understand service agreements for all eligible measures. Staff will be trained on the utilization of third-party resources such as the AHRI look-up tools to confirm the performance rating for mechanical equipment. For complex projects demanding advanced approval, staff with at least three years of technical experience will review the project. The application review process will follow the rebate processing workflows created by the program team. The program implementers will manage the review process and will document any essential review steps in the rebate processing system.

The state's rebate processing system will collect and store all project data and information. Online submission forms available through the application portal will be designed to comply with the Data & Tools Requirements Guide and will ensure users provide appropriate and valid information in the required format. Online forms will only allow users to enter valid information, and it will not allow users to submit the materials until the user corrects any automatically identified errors. ODOE and our implementers will outline internal procedures to address common data errors and will train project review staff to resolve the issue quickly and document any changes appropriately.

Project Application Review and Rebate Reservation

Implementers will review each project application for completeness and compliance with the program requirements. This review will include confirming the project location and (where different) home address via an address validation API. Implementers will also confirm that the contracted scope of work is consistent with the program requirements. Program staff will use a combination of visual review and

qualified product list look-up functions to confirm the eligibility of the proposed measure(s) and will visually review the scope of work to confirm an accurate depiction of the work, itemization of costs and rebate(s), and other program requirements. For applications found to have information that is missing or incorrect, implementer staff will consider the application incomplete and will work directly with the applicant to have them correct or provide the necessary information. If the necessary information cannot be provided or confirmed, the application will not be approved. The program will leverage these instances as a training opportunity for the contractor and/or assessor for continuous improvement.

The application will be considered approved for a HOMES rebate and may proceed with the installation upon project approval and generation of a rebate reservation. Once a reservation is approved, the program implementers will also create and upload a post-installation certificate of completion to the rebate processing system and will send a copy of the certificate to the contractor to be delivered to the rebate recipient upon completion of the installation.

Income Verification

For customers applying for an income-qualified rebate, applicants will qualify through one of two methods:

1. Submit documentation verifying household income and an attestation to household size.
2. Submit documentation verifying at least one member of the household participates in a pre-qualifying program or that the multifamily building qualifies.

For customers who qualify through income, implementer staff will review the submitted income information and documentation to verify that the household qualifies and that the qualifying customer(s) lives at the project address (i.e. the address on the income documentation matches the installation address). Accepted income documentation includes tax return documents, income statements, and any other forms of official documentation from an employer, government agency, or financial institution. Applicants will provide an attestation of household size through the rebate processing system or by downloading and submitting a form. The reviewer will confirm that the customer has submitted the attestation, and, if so, will confirm that the customer's income level is qualifying for their county and household size.

For customers who qualify through categorical eligibility, the reviewer will examine the submitted documentation to confirm that:

- it is an acceptable form of proof for that program;
- it clearly states the applicant is a participant;
- the address listed on the documentation matches the project address; and
- the date(s) listed on the document confirm the applicant is still eligible.

The implementers or their subcontractor will review the documentation to verify the information is accurate. The State will coordinate with the administrators of pre-qualifying programs to confirm what is an acceptable form of documentation of current enrollment. Program staff will be provided with a directory of acceptable documentation and a sample document for each pre-qualifying program.

The following programs are approved for categorical eligibility for single-family homes:

- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)

- Head Start
- Lifeline Support for Affordable Communications (Lifeline)
- Food Distribution Program on Indian Reservations (FDPIR)
- National School Lunch Program – Free (NSLP)
- Housing Improvement Program (HIP)
- Housing Opportunities for Persons with AIDS
- Supplemental Social Security Income (SSI)
- Weatherization Assistance Program (WAP)ⁱⁱ
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)ⁱⁱⁱ

Multifamily properties with no common areas or shared systems will apply for income-restricted rebates as individual units. Multifamily properties seeking rebates for projects that benefit common areas will need to comply with the program’s multifamily income requirements. Building owners can provide documentation of participation (at the time of application) in the following programs to demonstrate whole-building eligibility:

- Public Housing (housing owned by Public Housing Authorities)
- Privately-owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)^{iv}
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance (e.g., Section 8)^v
- Low Income Housing Tax Credit (LIHTC)^{vi}

If a multifamily building owner or property manager cannot demonstrate participation in an approved whole-building program, they may demonstrate qualification through submission of acceptable household-level income documentation that confirms at least 50 percent of dwelling units occupied at the time of income verification consist of income-qualifying households.

Once a project reviewer has verified the income information for a project, the homeowner and contractor (if one has been identified) will be notified that their full application may be submitted for review. If the reviewer is unable to verify the information after consulting with the applicant, the income qualification portion of the application will be denied, and applicants will be notified that they may only move forward with an application for a non-income-restricted rebate.

Address Validation

Program implementers will be responsible for reviewing all submitted project data, and reviewers will verify, among other things, that the address of installation matches the address contained in the project

ⁱⁱ In 2025, for 2024, households of one to four people, in any county in Oregon, may qualify for categorical eligibility through WAP. Households of any size may qualify in Benton, Clackamas, Columbia, Deschutes, Hood River, Multnomah, Washington, and Yamhill Counties. Households that are not categorically eligible through WAP may still apply for an income-restricted rebate through another program or through the income verification method.

ⁱⁱⁱ In 2025, for 2024, households of one to five people, in any county in Oregon, may qualify for categorical eligibility through WIC. Households of any size may qualify in Benton, Clackamas, Clatsop, Columbia, Deschutes, Hood River, Multnomah, Washington, and Yamhill Counties. Households that are not categorically eligible through WIC may still apply for an income-restricted rebate through another program or through the income verification method.

^{iv} At least 50% of units must be subsidized through this program.

^v At least 50% of tenants must receive this assistance.

^{vi} At least 50% of units must be income restricted.

record. During the project application review, reviewers will deploy address validation tools to validate the address and will cross-check all subsequent submittals to the validated address. Initial address validation uses multiple look-up functions (including USPS and Google validation functions), which includes a scan for expected secondary indicators to verify the apartment number is correct and if an apartment number is expected but not provided. If the address cannot be verified, the implementers will contact the applicant to secure a corrected address, which is then validated per the process described above. If an address cannot be verified, the rebate application will not be approved. Upon receipt of subsequent submittals such as service contracts and bids for work, the implementer will confirm the installation address matches the verified address assigned to the reservation. For multifamily projects where the applicant may be a business entity, the applicant will be required to submit a W-9, and implementers will cross-check the name listed under a Tax ID Number to verify the identity and address of the applicant.

Renter Protections

Before receiving a low-income rebate reservation for a rental property, building owners will need to agree to the following statements:

- For at least two years following the receipt of the rebates, I will continue to rent the dwelling unit to a low-income tenant.
- For at least two years following the receipt of the rebates, I will not evict a tenant to obtain higher rent tenants based upon the improvements.
- For at least two years following the receipt of the rebates, I will not increase the rent of any tenant of the building as a result of the energy improvements with the exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.
- If the property is sold within two years of receipt of the rebates, these conditions will apply to the new owner and will be part of the purchase agreement.
- I understand that tenants have been provided with written notice of their rights and their building owner's obligations. I have received a copy of this notice. I will provide a copy of this notice to any new tenants who move in over the next two years.
- If my tenant(s) file a complaint under the terms of this agreement, I understand that I may be contacted by the program implementers, the Oregon Department of Energy, and/or the Oregon Department of Justice for more information.
- If the Oregon Department of Energy or the Oregon Department of Justice determine that I have not complied with these requirements, I understand that I must refund the rebate and that I may be required to pay damages to tenant(s), or reimburse tenant(s) and/or ODOE for any legal fees.
- I understand that ODOE reserves the right to put a lien on my property for the amount of the rebate(s) at any time within the first two years following the receipt of the rebate(s).

Enforcement of these rules and penalties for violation are designed to be clear and sufficient to act as a deterrent for violations and to provide for damages and attorney's fees recoverable by tenants.

Homeowners will be able to submit this attestation digitally to our implementers by emailing a scan, completed pdf, or a photo; mail-in or other direct submission to our implementers who will upload digital copies to the rebate management system; and through an online, fillable form that will be available through the application portal.

The written notification to the tenant(s) will include contact information for complaints of non-compliance. Tenant(s) will be provided information regarding their ability to seek damages and reimbursement of attorney's fees (if applicable) through small claims or civil court, if the building owner is found to be in violation of these rules.

If a tenant submits a complaint to our implementers alleging building owner violation of these rules, our implementers will investigate the complaint with the tenant(s) and homeowner and attempt to resolve the issue. If the building owner is determined to be in violation and an appropriate resolution cannot be found, the implementer will notify the designated contact at ODOE. ODOE will review the case and attempt to negotiate a solution. If these actions are not sufficient to resolve the complaint, ODOE will notify the building owner that they must return the rebate amount to the appropriate implementer. ODOE will also notify any other ODOE-run rebate programs that the building owner should be excluded from eligibility. If the building owner does not return the money within the specified timeframe, ODOE will forward the information to the Oregon Department of Justice (DOJ) for potential enforcement action. Building owners will be required to sign an attestation to their understanding and adherence to these rules and processes.

Assessments and Models

Auditing tools and modeling software will have basic data validation controls on inputs to ensure data quality. The state will utilize existing tools and software, 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.

The state will allow the use of one or more of the DOE-approved software, which can determine and document weather-normalized energy use of a home, or portfolio of homes, before and after the completion of 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 meeting the rebate threshold as kWh or kWh equivalent. The state will alert contractors to these tools and train them on proper use through in-person events, webinars, and/or training videos. The state will conduct formal outreach through email and other marketing materials to ensure contractors are aware of how to access and participate in these trainings. Please see the Contractor Outreach section of the Education and Outreach Strategy for more information. The program will continuously make improvements to the curriculum and provision of trainings, clarify program rules when necessary, and provide technical support to participants.

Implementers will review the home assessment and modeling submissions for accuracy and completeness, and to identify any errors that need correction. This QC check will include reviewing the data inputs, modeling procedures, results, and recommendations to the homeowner. This QC check may include reviewing photographic documentation of existing conditions or conducting an independent assessment of home characteristics. These results and feedback will be provided to contractors as needed. The program will create procedures to address data exceptions and train reviewer staff for timely issue resolution and appropriate documentation.

For modeled projects, as part of the quality control process, implementers will identify corrections based on actual home or project characteristics if they are different from the original inputs as reported by the contractor. The contractor will be required to update inputs and resubmit models based on corrections or substantive change orders that impact energy performance. The program will continuously make

improvements to the curriculum and provision of trainings, clarification of program rules, and technical support provided to contractors.

Implementers will compare data submitted across contractors to detect outliers and potential problems with assessments. At a minimum, this will be conducted no later than one year after program launch. Contractors or Assessors who are flagged due to data collection anomalies or concerns will be required to take additional training on conducting assessments and/or shadow other contractors to learn best practices. The program will track these instances in order to identify areas for continuous improvement. Implementers will also compare a sample of contractors' energy models with results obtained from running the modeling inputs through the standardized Home Energy Scoring Tool (which already applies conservative assumptions regarding occupancy, occupant behavior, air leakage, etcetera).

Project Completion

Once an installation is complete, contractors will submit the following information to the rebate processing system:

- Geo-tagged photos for all heating, cooling, and water heating projects that will include model numbers.
- 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.

Oregon will create guidance materials that clearly explain how to collect and submit all required project completion documents.

Implementer staff will review the submitted completion information and verify the final project was consistent with the final contracted scope of work. If necessary, implementer staff will work with the contractor to correct any errors. If the inconsistencies cannot be corrected and implementer staff determine that the installed project cannot qualify, then the rebate will not be reimbursed.

Once all essential documentation has been received and verified, the project may receive reimbursement. Implementers will process rebate payments within four weeks of submission of all required project completion documents. Every week, implementers will review the previous week's processing times; if more than 5 percent of reimbursements took longer than four weeks to process, implementers will notify ODOE. If the implementers' monthly report shows that more than 10 percent of reimbursements took longer than four weeks, implementers will be expected to take corrective action, as necessary, to ensure future payments do not continue to exceed the expected four-week timeframe.

Contractors and Other Partners

Education and Outreach

As described in greater detail in the HOMES Education and Outreach Strategy, Oregon will create informational materials to educate contractors and building owners on best practices for project implementation. These materials will describe, among other things, the benefits of investments in envelope improvements that can reduce air leaks, including measures such as air sealing, duct sealing, window attachments, fenestration upgrades, and insulation. Information will be tailored, as necessary, to building owners and contractors, and all materials will be available on the program website. The state

will also require contractors to provide the building owner with standard information regarding how a home's conditions interrelate and how the building envelope can affect comfort, moisture, etcetera.

When a home's baseline envelope conditions are insufficient, contractors will be required to propose envelope improvements to the homeowner or building owner. Prior to launching the program, the state will work with experts (e.g., U.S. DOE or national labs) to establish pre-condition thresholds where, for projects that meet these preconditions, contractors will be required to run at least one comparative model that includes envelope improvements to demonstrate how different options are likely to affect energy use, utility bills, and, where applicable, HVAC system sizing. Contractors will be required to submit a copy of the comparative model results to the building owner as well as the rebate processing system.

Participation Agreements

Participating contractors will be obligated to sign participation agreements that will require their adherence to specific program requirements, terms, and conditions including but not limited to quality assurance controls, data quality standards, etcetera.

Contractor Enrollment

The program will utilize a closed network, meaning that contractors are required to enroll as a qualified contractor to be able to offer HOMES rebates to customers. This requirement helps ensure contractors have gone through the proper training, meet the program's insurance requirements, and have proper certifications. It also helps protect consumers from installations that are not up to the program's quality standards and will keep contractors from participating if they do not meet, or fail to maintain, the program's requirements. The enrolled contractor list will be posted on the program website, along with information that describes the contractor list and how households should use it. This information will also be available on the state's one-stop-shop website.

All contractors will submit an online application to be on the enrolled contractor list. To be eligible, contractors must hold current business insurance with at least \$1,000,000 of liability insurance, workers compensation insurance (when not exempt), active home performance industry credentials relevant to the services being provided (e.g., BPI certification, Sustainable Homes Professional Training, Home Accessor Certification), and a state license or must register with the state (when applicable).

Implementers will also conduct a business background check by reviewing the contractor's listing in the Oregon Construction Contractors Board database to identify any past complaints and claims made against their license. The program will continuously evaluate methods of verifying credentials and implement those methods when identified. The application will collect business and contact information, payment information, and any other supporting documents. The application will detail all acceptable credentials and documents that will be required for different trade groups.

Applicants will be provided with a copy of the CPP and, as part of their participation agreement, must agree to adhere to all requirements and quality assurance/quality control processes described in the Plan. Contractors will be required to affirmatively acknowledge adherence to the following statements:

- Customer agreements cannot contain mandatory arbitration clauses.
- Customer agreements must include the holder-in-due course rule, so consumer protections are not lost if the contract is assigned to a 3rd party creditor.
- If any of the work will be completed by a sub-contractor, it is the responsibility of the primary contractor to ensure compliance with these program standards and guidelines.

- Contractor understands that, unless they request an extension prior to expiration, rebates will automatically expire 180 days after application approval. Contractors will be allowed up to one extension, after which they will need to resubmit a new, updated application.

Before a contractor is added to the approved contractor list, program implementers will review each application for completeness and will – to the extent possible – verify that the information submitted is correct. The review procedure will require that program staff verify a contractor’s license with the Oregon Construction Contractors Board (CCB), including the contractor’s worker’s compensation insurance coverage, liability insurance coverage and bond information. The contractor – or the subcontractor being used by the contractor – will also be required to hold a license from the Oregon Building Codes division. ODOE or our implementers will also check the U.S. Department of Treasury Do Not Pay system to confirm the contractor is not listed. An application may be returned or rejected if it is missing any information or if clarification is needed.

Energy Trust and ODOE will encourage contractors on their existing approved contractor lists to apply for inclusion in the Home Energy Rebates programs’ approved contractor list. The total number of incumbent contractors participating in Energy Trust and ODOE programs is over 500. ODOE will also provide contractors who have completed the training under IRA 50123 with information about how to apply for inclusion on the enrolled contractor list. Virtual webinars and in-person meetings will spread awareness broadly across Oregon’s contractor community. Energy Trust and ODOE will feature enrollment and training opportunities at existing in-person forums, including Energy Trust’s annual Trade Ally forums which occurs in Q3 at multiple locations in Oregon. New contractors will also be recruited through state and local industry associations.

Contractor enrollment will be effective as of the date of an application approval notice, after which an enrolled contractor will be subject to these terms and conditions and all program-specific terms and conditions for participation. Implementers will inspect at least the first five projects completed by all newly enrolled contractors. Newly enrolled contractors who pass the minimum number of required project inspections without significant quality issues and meet any program specific enrollment or training requirements will be placed in active status. See the [Onsite and Virtual Inspections](#) section below for more information. In addition, implementers will conduct on-site QC on the first assessment completed by each newly onboarded assessor.

Contractors may be eligible for accelerated inclusion to the enrolled contractor list, if they are already providing rebates through an existing rebate program managed by Energy Trust or ODOE, or any other program identified in the program materials. These “existing” contractors must still submit an application to the rebate processing system in order to be included; however, existing contractors who are in good standing with the program(s) may be exempted from the requirement to have the first five projects inspected, as well as the requirement for on-site QC review of the first assessment.

Contractor Probation, Suspension, Termination, and Delisting Policies

The probation, suspension, and termination policies are designed to protect the program, contractors, customers, and other entities from losses due to poor work quality, diminished energy savings, health and safety issues and building durability risks. It protects against investing limited resources in unproductive projects or companies. In accordance with all application terms and conditions, the program may suspend the acceptance of a contractor’s project applications, place an approved contractor on disciplinary probation, or terminate their participation at any time. Oregon will develop a specific conflict resolution process to identify and implement customer protection solutions when a

contractor with active or completed (but not yet reimbursed) projects is put on probation, suspended, or terminated.

Implementers will monitor the activities of contractors on a regular basis to ensure they provide value to customers and the program. When implementers determine that a contractor is not acting within the program standards and guidelines, they may move contractors into disciplinary probationary status or terminate them from the network. Affected contractors may be given support and opportunities for improvements and may return to active status, as outlined below. At the program's discretion, approved contractors may be required to pursue quality control process consultation and work quality verification from third-party quality control providers, at their own expense, prior to readmission to the program.

Probation and Suspension

Contractors may be placed on disciplinary probation at the program's discretion. They will be notified in writing of the change of status. The notification will include an explanation for the status change and the steps they must take to correct problems that led to their disciplinary probation status. Failure to remediate performance issues may result in termination from the program's trade ally network.

Disciplinary probation will begin if work quality or customer service issues arise through multiple corrective actions or customer complaints. When a contractor is placed on disciplinary probation, the program may issue a cease-and-desist letter to stop all work until corrective actions are implemented. Contractors on probation will be given seven days from the date on the notification to respond to a disciplinary probationary letter, unless otherwise specific in the letter. Failure to respond may result in termination from the program's approved contractor list. The program may request that a responsible managing individual draft and sign a performance improvement plan and memorandum of understanding before accepting additional rebate applications. The program reserves the right to communicate health, safety, and customer service issues to participants.

Actions resulting in disciplinary probation may include, but are not limited to:

- Inspections resulting in disqualification or more than one major or minor correction action; project volume, time involved in the program, and historical pass rates will be taken into consideration.
- Failure to remediate corrective actions identified during inspections within 30 days of written notice.
- Failure to follow a required program process.
- Abusive or vulgar behavior, physically or verbally, toward customers, program staff, or program partners.
- Allowing insurance, licenses, or other required certifications to lapse.
- Failure to resolve any reasonable participant complaint regarding the contractor's work on program projects.
- Repeatedly giving participants inaccurate information on current program requirements including, but not limited to, rebate levels and/or rebate eligibility.
- Misrepresenting the contractor's relationship with the program, such as:
 - Stating they are paid or employed by the program, if they are not.
 - Stating they offer services on behalf of the program that they are not under agreement to deliver.
 - Making inaccurate statements about the program's funding sources, rebate amounts, application deadlines or requirements.

- Misrepresenting the program's installation specifications as substandard or as having requirements that are burdensome when speaking with customers.
- Unethical business or sales practices, including coercion and/or overly aggressive sales tactics, as determined by the program.

During disciplinary probation, a contractor will be subject to a higher level of scrutiny or restrictions than trade allies in good standing, which may include, but is not limited to:

- Higher levels of inspections; up to 100 percent inspection of projects as determined by the program. Contractors may be required to pay for approved third-party work quality verification.
- Prohibition from submitting new applications and return of new applications to contractor and customers.
- Customer notification of the contractor's probationary status.
- Suspension from program benefits such as business development funds and other resources.
- Development of, and adherence to, a written performance improvement plan and/or memorandum of understanding detailing requirements to maintain approved status. Contractor will be responsible for drafting the performance improvement plan according to the direction and in cooperation with the program. Performance improvement plan will detail specific deliverables and timelines.
- Attending additional training required, selected by or provided by the program. Contractor may be required to pay for additional trainings.
- Reporting of probationary status to other organizations and utilities.

Contractors who continue to violate policies described in this Consumer Protection Plan, or in any other specific program documents, will be terminated from the approved contractor list.

The duration of disciplinary probationary periods will vary depending on the nature of the issues that resulted in disciplinary status. Project volume and time involved in the program will be taken into consideration. The written notification of disciplinary probationary status and/or the performance improvement plan will define the length of the probationary period and requirements for the contractor to return to full active status.

Reinstatement

The program may remove disciplinary probationary status and fully approve or reinstate enrolled contractors to active status any time, at its sole discretion. The program will review disciplinary probationary contractors for return to active status according to the timeframe established in the written notification of disciplinary probationary status. Contractors will be returned to active status provided they satisfy the requirements and/or timeline outlined in their disciplinary probation notification letter and/or performance improvement plan. The program will notify disciplinary probation contractors of the decision in writing.

Termination and Delisting

In addition to any other termination provisions set forth in the participation agreements, certain actions may result in immediate termination from the approved contractor list. The program will notify the contractor in writing if they are terminated from the approved contractor list. Actions resulting in immediate termination from the list may include, but are not limited to:

- Failure to resolve any action that resulted in disciplinary probation, including failure to comply with the probationary notification letter and/or plan of improvement.
- Repeated violations of program results or requirements.
- Passing or attempting to pass any required re-verification and/or corrective action costs on to a customer.
- Violation of license laws or cases of fraud.
- Repeated misrepresentation of contractor's relationship with the program, its requirements, funding sources, or specifications.
- Failure to keep license, insurance, or required certification information up to date with the program.
- Accumulation of more than three unresolved customer complaints that the program determines to be reasonable within a 12-month period.
- Ongoing quality assurance failures not resolved through a written improvement plan during a probation period.
- Quality assurance failures at 25 percent or more of projects selected within any 12-month period.
- Drugs and/or alcohol reported at a project site.
- Unsafe working conditions reported at a project site.
- Abusive or vulgar behavior, physically or verbally, toward customers, program staff or program partners.

Contractors will be notified by written mail and/or email of a decision to terminate them from the approved contractors list. The termination notice will include an explanation of the decision and the remaining steps the contractor is required to take. The program may refuse to accept new rebate applications from customers of the terminated contractor at its sole discretion and will provide a cutoff date to accept new applications for projects completed prior to the contractor's termination. The notice will also indicate whether the contractor may reapply at a future date.

The program will notify current customers of the contractor's change in status. The notification will provide steps the customer can take to resolve complaints and/or receive rebate payments. As part of the next steps included in customer notifications, the program may provide contact information for licensing bodies or other consumer protection opportunities and/or instruct customers to contact the terminated contractor directly to resolve quality or rebate payment complaints. The program will notify customers of any potential health and safety concerns related to projects installed by terminated contractors.

The program may, at its sole discretion, allow a terminated contractor to reapply at a later date, not sooner than six months after the time of termination. However, the program may require additional documentation and proof from the contractor that they have taken appropriate actions to prevent further violations.

Enrolled contractors with severe and repeated quality, customer service, legal, or health and safety concerns may be listed in customer facing sections of the program's website with a warning that applications will not be accepted from that contractor or their affiliates.

Enrolled contractors may choose to withdraw from the list at any time by notifying the program in writing. The program implementers must upload the withdrawal request to the business' account and remove the business from the online list. Delisting will take no longer than 3 business days.

Installation

Oregon will provide contractors with guidance and direction for completing quality installations of rebated technologies that meet industry standards and program requirements, while also maximizing savings, minimizing indoor air quality problems, minimizing moisture accumulation, and ensuring maximum operating capacities of the installed equipment.

Installation standards are outlined in the programs' Installation Manual, which is published separately and is based off Energy Trust's existing specifications manual.^{vii} Where Energy Trust did not already have an existing measure, new specifications and details were added. These specifications were developed and reviewed by Energy Trust, Earth Advantage, TRC, and CLEAResult. Stakeholders, such as contractors, will be engaged through the outreach of the HOMES and HEAR programs. Stakeholders, advisory committees, and technical experts have a chance to provide feedback on the Installation Manual on an annual basis.

Energy Trust's specification manual builds upon itself from year to year with an annual review process led by our quality assurance and engineering teams. Energy Trust, TRC, CLEAResult and utilities are given an opportunity to provide feedback on proposed changes, which are informed by the prioritization of customer health and safety, prolonging measure longevity, industry best practices, changes in technology, and quality assurance results. In years that significant changes are proposed such as the launch of HOMES and HEAR, the contractor network is also given an opportunity to provide feedback. Since this is a new program, review of the Installation Manual will follow the same stakeholder feedback process as Energy Trust specification manual allowing for stakeholders to provide feedback.

Contractors will not be required to use the PNNL Quality Install tool to submit information about installations; however, they may still choose to use the tool, and the program website will link to PNNL information about its use. Standards within the Installation Manual include verification that equipment is installed properly, energized, working, commissioned and sized appropriately and tested, when possible. The installation manual also accounts for all health and safety checks required by the Data and Tools guide. Oregon requires that geotagged and dated photo documentation of the equipment is provided to verify installation occurred.

The program's installation standards apply to the following technologies:

- Heat pump water heater
- Ductless heat pump
- Air source heat pump
- Heat pump clothes dryer
- Insulation, air sealing, ventilation
- Electric stove, cooktop, range, or oven
- Electric wiring
- Electric load service center

Installation guidance will be available on the website prior to launch, and compliance will be enforced through post-install inspections as described in the Onsite and Virtual Inspections section. Equipment and materials must be installed according to the manufacturers' installation instructions.

^{vii} <https://insider.energytrust.org/wp-content/uploads/Specifications-Manual.pdf>

Installation guidance will include detailed instructions that promote the use of standardized and sequenced procedures for developing a detailed project scope of work. The scope of work provided to the customer will be a detailed listing of the home improvement measures. The scope of work should also indicate the optimal completion order of the measures to maximize energy savings. Installation of the measures shall be completed in an order that prevents potential ensuing defects and maximizes energy savings. To help contractors create for each project an acceptable scope of work/contract consistent with the program requirements, Oregon will develop a standardized scope of work/contract template.

In addition, contractors seeking entry to the approved contractor list will be asked to state that they understand the program's installation standards and that they must comply with all applicable laws, ordinances, regulations, and codes regarding the installation of the equipment. Contractors will be required to obtain any applicable permits, as they pertain to the project's scope of work. Enrolled contractors will be instructed to ensure that sales language and contract language are the same.

Depending on the scope of work, contractors will be required to submit documentation that may include a visual inspection, commissioning of the system, diagnostic testing, and combustion safety testing. Guidance for such reviews will be provided to contractors and available on the website. In addition, contractors installing projects that must receive mechanical and/or electrical permits will be required to provide reference numbers and the name of the permitting jurisdiction for all finalized permits.

Oregon plans to develop and launch the program with the existing ENERGY STAR specifications and qualified product lists (QPLs). Oregon created copies of ENERGY STAR's current program and will have them available for the initial launch. Oregon will leverage these specifications for as long as possible. For new products, Oregon will leverage similar specifications (such as those produced by the Consortium for Energy Efficiency (CEE)) and is exploring a way to test products similar to the testing that occurred with ENERGY STAR.

Financing

If a contractor offers financing to the property owner for the remaining portion of the upgrade cost, the contractor must provide a written disclosure listing the number of payments, monthly payment amount, all fees and costs including financing and late fees, and other important payment terms. The contractor must ensure a determination regarding the customer's ability to repay does not include projected savings from an energy report because expected savings may not materialize.

This disclosure must be provided to the customer in advance of contract signing, with a seven-day waiting period between disclosure and contract signing. The waiting period should only be removed in an emergency, in which the property owner, in their own handwriting, explains the emergency and the need for emergency work, and states they understand they are waiving the waiting period. In non-emergency situations, there should be at least a three-day window after the contract is signed and before work begins, in which the property owner has the right to cancel the contract.

Onsite and Virtual Inspections

Inspections enable program staff to ensure contractor compliance with all program requirements; identify opportunities for program and contractor improvement; and provide a quantitative metric with which to measure installation quality. This can be performed via onsite and/or virtual examination of installed work, data analysis, and/or document review, also commonly referred to as quality assurance.

The program requires contractors to honor contracted rebate amounts to participants regardless of disqualification. If the program receives multiple customer complaints about a specific contractor, the program may provide affected customers with contact information for staff at Oregon's licensing agency (the CCB), which regulates contractor business and contractor performance.

Inspections will be completed by the implementers. Inspectors will be part of the core implementation contractor's team and will be trained on all aspects of the program requirements. The program will require inspectors to receive training in building science principals and to have at least five years of experience completing home energy efficiency projects and/or home energy assessments. This training will provide both academic and hands-on in-field components. Because implementers will not be responsible for installations, they meet the U.S. DOE requirement for inspectors to be independent.

Inspection Protocol

Program implementers will conduct independent, onsite, post-install inspections on a minimum of the first five projects (for new contracting companies only) and five percent of projects thereafter, provided no issues are found. These counts include projects from both the HEAR and HOMES programs. The program reserves the right to increase a contractor's inspection rate or require in-person or virtual inspections at any time. Inspection rates may be increased based on factors that may indicate an increased risk of poor workmanship or non-compliance with program requirements. For example:

- Sudden increases in applications
- Misrepresentation of measure eligibility criteria
- Questionable or incorrect representation of house/site information
- Customer service complaints
- Frequent or inconsistent corrective action results
- Ongoing failure to comply with program guidelines

If inspectors continue to identify projects that require major corrective actions or that do not qualify for a rebate, the contractor may be put on probation, suspended, or removed from the approved contractor list.

When an installation is selected for inspection, the program will make contact with the building owner within one week of selection to schedule an appointment. The inspector may visit the participant's home, perform data analysis, review and request additional materials such as photo documentation, and conduct inspection according to program requirements on measures for which the participant is claiming a rebate.

Inspectors will conduct a visual inspection of the site and work conditions. The inspector will verify that the installed upgrades match the contracted scope of work and any change orders have been appropriately documented. The inspector will verify that equipment is installed per manufacturer's instructions, is energized and turns on and off, and appears to function normally. The inspector will verify that diagnostic test results are accurate; these results may be directly observed if the inspector is present at the time of testing or repeated by the inspector, if necessary.

The inspector will inform the building owner and contractor whether the work passes, requires major corrective action, requires minor corrective action and/or does not qualify.

- **Pass:** A pass means that the work was satisfactorily installed and completed according to the approved rebate application and is in full compliance with program requirements. No corrective actions are necessary.
- **Corrective Action:** Inspections result in corrective action when the inspector determines that the work does not comply with the program requirements.
 - Minor corrective actions are required when the work is unsatisfactory, with minor problems associated with energy savings, health and safety, building durability, or overall installation quality, and/or does not comply with program requirements.
 - Major corrective actions are required when the work is unsatisfactory, with potentially significant or serious problems related to energy savings, health and safety, building durability, or overall installation quality, and is substantially noncompliant with program requirements.

In the result of a major or minor corrective action, both the building owner and contractor will be notified, either electronically or by mail. The notice will also state what corrective action(s) are necessary to comply with the relevant program requirements. This notification will include a statement that the rebate payment may be withheld until the corrective action is complete and that the project may require a follow-up inspection.

- **Does Not Qualify:** If the inspection determines that the project does not qualify, the building owner and contractor are notified that the project or measure does not meet the eligibility criteria for receiving a rebate. The contractor shall reimburse participants for any expected rebates that are denied. The program will not process or release rebate payments for projects or measures that do not meet the eligibility criteria. The program may retroactively recover rebates paid for improperly installed and/or disqualified measures.

The inspector must produce and sign a final inspection report and provide an electronic copy to the building owner. Electronic signatures must be E-sign compliant. The inspector will additionally provide a physical copy of the report to the building owner (either in person or by mail) within two weeks of a completed inspection. If English is not the building owner's primary or secondary language, the inspector will engage a translator and append this translation to the report before sending both the physical and electronic copy to the building owner.

Inspections confirm compliance with the installation manual that is referenced above and attached to this plan. This includes confirming equipment by visually inspecting nameplate data and completing a make/model look up. Window U values are confirmed by inspecting manufacturer labeling on glazing surface (glazing sticker) and that the window was installed in the reported location within the home. Insulation R values are confirmed by measuring the depth and uniform application of insulation materials. The information collected during in field or virtual inspections are corroborated with the reported project attributes included in the rebate application and submitted energy modeling files.

Program implementers will ensure all inspection records are maintained in the state rebate processing system; these records will include sampling rates, findings, corrective actions taken, and verification of conformance to requirements. These records will be retained for a minimum of six years. For projects that receive an inspection, implementers or the inspectors will ensure the final inspection report is uploaded to the project record. Program implementers will track inspection sampling rates by contractor.

Additional Requirements for Virtual Inspections

Virtual inspections may be utilized to expedite customer-requested inspections, or in response to acute time sensitive concerns with work quality or equipment functionality. In general, field-based inspections will be prioritized, and virtual inspections will be an option where they can mitigate challenges and costs for accessing remote locations or for time sensitive, customer-initiated requests. Quality assurance verifications requiring combustion appliance testing will not be eligible for virtual inspections. The qualifications for staff conducting virtual inspections will be the same for staff conducting field-based inspections. As with in-field inspections, privacy protocols ensure photographic proof does not contain the following: people and/or photographs of people, or any personally sensitive or identifying information. The program will require the household to sign a privacy and data sharing agreement. If program participants decline virtual recording of their home, an onsite inspection must be used. Virtual inspections will require contractors to submit the same information as they would for in-field inspections.

The State will work with implementers to identify tools to be used to conduct virtual inspections. These tools will, at a minimum, include video conferencing applications. Whether supported by a customized tool such as IRSCX or performed over a videoconference application such as MS Teams or Facetime, virtual inspections and reports will include all the same checks as field-based inspections. Energy Trust utilizes IRSCX to conduct virtual inspections for single-family sites, which enables the program to organize inspection data points, receive automatically generated summary notes from each call, take and attach screen shots to inspection reports, and support low-bandwidth operation. The process used by the second implementer will be determined once that entity is selected.

Continuous Improvement

Identifying Fraud, Waste, and Abuse

The State of Oregon is committed to identifying and preventing waste, fraud and abuse. Through the rebate processing software, program staff will collect the appropriate data and review each rebate application. Program staff will develop project review procedures that will include information about identifying fraud, and each project will require multiple internal approvals to ensure that each rebate amount is correct and to prevent fraud. Relevant procedures will include checking for duplicate applications, both within the HOMES and HEAR programs as well as other state and ratepayer funded programs. Queries for duplicate payments will be performed against both the site address and the name of the applicant. Implementers will review project invoices to confirm costs are clearly identified and segmented appropriately. Implementers will perform regular analyses that identify anomalies in project costs and will flag all projects with anomalous or undocumented costs. In addition, project reviewers will confirm that: the contractor is enrolled in the program; the contractor's license is active, and they are in good standing; the required documentation is correct and complete; the rebate is being issued to the correct entity; and other steps, as necessary. The procedures for reviewing applications will be documented prior to program launch and reviewed every quarter to ensure that it is up to date and accurate.

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. The program website and other materials will explain that any program fraud or abuse will be subject to possible penalties that may include fines, removal from future eligibility to participate in the program, as well as

possible criminal charges. 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 will 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. As a result of such investigations, contractors may be removed from the enrolled contractor list.

In addition, as described in the Contractors and Other Partners section, Oregon will have a robust contractor management system that will ensure only reputable and qualified contractors participate in the program. Ongoing contractor monitoring activities will ensure any fraudulent, wasteful, or abusive activities are identified and dealt with as quickly as possible. Program materials and the contractor enrollment process will notify participants that any fraud or abuse by program participants, contractors, customers, etcetera will be subject to possible financial and legal penalties. Enrolled contractors will need to provide a signature as acknowledgement that they have read and understand such warnings.

Oregon's rebate processing system will also connect to the PNNL National Rebate Tracking System, which will serve as another check that ensures households are not receiving multiple rebates from one program or receiving rebates for the same measure from both the HOMES and HEAR programs.

The website and other materials, where appropriate, will direct anyone seeking to report fraud, waste, or abuse to contact the customer complaint system via phone, email, or a webform. Such reports will be handled according to the systems described in the Conflict Resolution Procedures section and the Contractors and Other Partners section. The state will include proactive acknowledgements in program materials proclaiming that any program fraud or abuse by program participants, contractors, customers, etcetera may be subject to financial and legal penalties.

Implementing Automation

Processes and data systems will use a standard agreed upon data model to leverage Application Programming Interface (APIs), automated secure data file transfers, and error handling alert mechanisms, where applicable, to ensure consistency, data accuracy, and minimize errors.

The contractor registration and rebate application portal will contain form fields that will limit user input and contain built-in logic that will notify users where there is an error; this will help reduce the number of incorrect or incomplete applications. The system will send automated messages and reminders to applicants at specific steps in the process, such as when they submit a rebate application or a request for reimbursement, or rebate reservations are about to expire. This will help ensure users can confidently engage with the system without having to wonder what is needed from them, what the next steps are, or whether their submission was received. When selecting a vendor for the rebate processing system, ODOE will explore additional functions that can be automated to identify problem areas with program performance. The Rebate Management system will automatically track project timelines and deadlines, automatically track missing required documentation and information, and will potentially automate communication with program participants regarding these issues to help manage and ensure program performance. Systems used for the administration of the program will be used to automate the identification of fraud, waste, and abuse including but not limited to the means described in the Fraud, Waste, and Abuse section above.

Evaluating QA Systems to Inform Program Improvements

ODOE will conduct ongoing and periodic improvement evaluations of the effectiveness and efficiency of all QA systems and processes. Prior to launch, ODOE and the program implementers will develop a plan for a process improvement evaluation that will periodically assess the effectiveness and efficiency of all QA systems and processes and identify areas for improvement. These evaluations will include assessment of the customer satisfaction surveys, information from the feedback and conflict resolution processes, inspection results, and more. Implementers will submit monthly performance reports that ODOE will use to audit the program and the performance of the implementers (including the process and accuracy of all reported program outcomes). These reports will include metrics such as the number of open tickets and other system performance metrics. These indicators will provide the state with insights into program success rates and signal areas of improvement. In addition, ODOE will periodically evaluate the contractor verification and project inspection processes to identify gaps and make process improvements.

By monitoring performance metrics and conducting improvement evaluations, ODOE will ensure the continuous improvement of the HOMES program. Following the completion of a review, ODOE will develop a report that will summarize relevant monitoring data and evaluation results. The report will outline any essential revisions to the program, or any of the plans or processes. Such revisions may also occur at any point throughout the life of the program, as necessary to address any issues identified by ODOE, the implementers, and the program's QA processes. ODOE will communicate relevant changes, as necessary, to enrolled contractors, third-party inspectors, program implementers, etcetera. A copy of these reports will also be sent to U.S. DOE.

Monitoring Budget and Financial Performance

ODOE's Central Services Division will oversee the program budget and financial performance to ensure that funds are being used efficiently and effectively. The program will have a Grants Officer assigned to maintain financial records associated with the program, as a single point of contact to the federal Project Officer, and to coordinate all required federal reporting requirements. All expenditures against approved budgets delineated in the contract (contractors) or performance agreement (subrecipients) will have multiple layers of oversight, from the program staff, Program Manager and the Grants Officer. Contractors and ODOE's subrecipient, Energy Trust, will track expenditures and other program metrics, and provide a monthly report to ODOE. Such metrics will include the dollar value of rebates reserved and issued per month; the number of rejected, withdrawn, and expired applications; and others. Where possible, metrics will be provided for categories including low-income, low-income multifamily, urban/rural, and others. ODOE will evaluate trends in these reports and other rebate data to ensure the program stays within the administrative budget, continue to meet requirements, stay on track to meet all program goals and requirements, and ensure funds are spent effectively and efficiently. Monthly metrics related to effective spending may also include dollars spent per measure or unit or average estimated energy savings per project. ODOE will also provide financial summaries and analyses, as required, to comply with U.S. DOE's reporting requirements and evaluations. Additionally, ODOE will follow Generally Accepted Accounting Principles (GAAP) and conduct audits at least every 5 years through an independent contractor.