

Attachment 3

Consumer Protection Plan

State of Wisconsin Home Energy Rebates Home Efficiency Rebate (HOMES) Program

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Purpose

The Consumer Protection Plan (CPP) for Wisconsin’s HOMES Program describes the quality assurance features and procedures Wisconsin will perform to protect consumers and ensure customer satisfaction. The CPP will be available on a dedicated IRA – HER program webpage within the Focus on Energy website for all program participants. The CPP will be reviewed at least every two (2) years, with changes clearly communicated to program partners, participants, and the DOE. Documentation regarding Wisconsin’s monitoring, review, and revision of the CPP will be provided to the DOE at least every two (2) years.

Consumer Feedback

Processing Consumer Feedback

Wisconsin’s IRA Home Energy Rebates Program values receiving feedback from program participants and partners. Interested parties will be able to contact the program through the existing Focus on Energy toll free number (800) 762-7077 and via email (IRAHer@focusonenergy.com). All program contact information will be made public on the program’s web pages at: focusonenergy.com/home-energy-rebates.

When feedback is received through the program email address or toll-free number, Focus on Energy will evaluate the information and report the feedback and required next steps to the appropriate party within two (2) business days. All contractor complaints, negative feedback or compliments will be recorded by the party who received the complaint in the database of record upon receipt.

Survey

A follow-on survey will be sent to the customer three (3) months after the completion of a project. This survey will allow customers to file complaints, concerns, and issues directly to the program. The survey will also contain procedures for addressing negative feedback, including how the programs will communicate the feedback to affected contractors, distributors, or retailers. The survey will include the questions listed in Table 1 and may also include other questions. This survey has not yet been designed.

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	

Resolution Procedures

Consumer Complaints Resolution

Definitions

Throughout this CPP, the terms Program Administrator and Program Implementer are used. The definitions for these terms and others used are as follows:

Program Administrator: An entity hired by the State of Wisconsin to administer the program delivery of the IRA Home Energy Rebate Programs.

Program Implementer: An entity hired by the Program Administrator as a sub-contractor delivering one or more programmatic functions of the IRA Home Energy Rebate Programs.

Registered Contractor: A licensed contractor in the State of Wisconsin who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to customers.

Registered Distributor: A distributor of qualified products who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to contractors or customers.

Registered Retailer: A retailer of qualified products who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to contractors or customers.

A complaint or incident is defined as any event in which:

- Customer contacts the Program or representative of the Program and alerts them of an issue that occurred during or as a result of their participation in the Program; or
- An event which deviates from the ideal course of events for customer participation in the program and which could negatively impact the customer's experience.

Notification of Complaints/Incidents

If program personnel (e.g., customer service, rebate fulfillment, or field staff) receive a complaint from a consumer regarding a contractor's conduct or performance, or are involved in an incident, they are instructed to notify the appropriate Program Implementer as soon as possible.

Upon learning of a complaint or incident, the Program Implementer's senior program manager will designate and assign the complaint or incident to the appropriate staff member. The designee will attempt to contact the individual by telephone within one business day. The designee's goal is to understand the complaint and help resolve the issue as soon as possible. The Program Implementer will respond to safety-related or emergency situations immediately. If a complaint cannot be resolved via the phone, the Program Implementer will schedule a follow-up site visit to further evaluate the circumstances of the complaint.

The Program Implementer will notify the Program Administrator of any complaint that is not resolved within two business days after the Program Implementer receives the complaint, along with a proposed course of action or follow-up plan.

All complaints will be reported to Program Administrator should include the following:

- Customer/Registered Contractor Name
- Address
- Utility Name(s) and Account Number(s)
- Phone Number
- Email Address
- Description of Complaint
- Steps taken to resolve the complaint, including all Program Implementer contacts with the Customer or Registered Contractor
- Results and outcomes of the action taken
- Date of resolution

Complaints will be logged on the contractor or account in the database of record following the Conflict/Incident Documentation Procedures below.

Consumers may also lodge a complaint directly with their Registered Contractor. The contractor will have agreed to the program's Participation Application, which will require their adherence to a standard reporting protocol for complaint and incident resolution. Registered Contractors should endeavor to resolve all complaints/incidents with the customer. If they cannot reach an agreement with the customer, the Program Implementer and/or Program Administrator will become involved, as appropriate.

The Program will publish a remediation process on the program website to describe what actions could be taken when deficiencies or unfair business practices 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. The remedies and penalties will be developed upon issuance of guidance from the DOE. In the event where financial compensation is requested by the customer, the Program Implementer will work with the Registered Contractor to determine if such compensation is warranted. If it is, the Registered Contractor should offer to pay a reasonable fee for repair and/or replacement of the improperly installed or damaged goods. To determine the amount of the fee, the Registered Contractor may propose an amount, ask the customer for an amount, or ask the customer to submit an estimate for the work. Ultimately, the Program Implementer, Registered Contractor, and the customer must agree to the amount of reimbursement.

Conflict/Incident Documentation Procedures

All incidents and complaints, including health and safety complaints, will be recorded on the Registered Contractor account in the database of record. The initial entry will include:

- The date of initial complaint/incident
- Customer name and account number in database of record
- Program
- Form of complaint (in person, letter, email, phone call, help desk)
- A detailed description of the complaint/incident
- Action taken
- Date of resolution

The Program Implementer will document all communications between parties in the database of record.

Periodic review

Documented conflicts and incidents involving registered contractors will be reviewed at minimum once per quarter. Findings will be delivered to the Program Implementer by the Program Administrator. The Implementer will be required to review the Administrator's findings and provide a recommended course of action. Once approved, the Program Implementer will meet with the registered contractor to implement the action.

During quarterly reviews all documented conflicts logged in the database of record will be reviewed to determine trends and systemic issues. Registered contractors who are found to have 2 or more complaints in a rolling 12-month period may face disciplinary action from the program, or may be asked to take corrective actions to ensure complaints do not persist.

Per the program's "Participation Agreement", disciplinary action may include but is not limited to:

- The program issuing a warning to the Registered Contractor.
- The program requiring the Registered Contractor agree to additional field inspections (QC) for a prescribed period of time.
- The program requiring the Registered Contractor provide additional data when submitting an application.
- The program delisting a Registered Contractor.

The Program will reserve the right to determine if corrective or disciplinary action is warranted based on the circumstances of individual complaints and the documented outcome.

Quality Control (QC) Inspections

The Program Implementer will be required to maintain records generated from QC inspections for a period of six years. Data points that must be retained include:

- Sampling rates (overall)
- Findings (per QC)
- Corrective actions taken if any
- Verification of conformance to program requirements (per QC)

Arbitration and Holder in Due Course Rule

No contracts may include a mandatory arbitration clause. Registered Contractors may not require mandatory arbitration for any issues or incidents that arise in connection with IRA Home Energy Rebate work.

Per the Holder in Due Course Rule, consumers have the right to assert the same legal claims and defenses against anyone who purchases the credit contract, as they would have against the seller who originally provided the credit.

Data review

Each rebate application will go through an approval workflow prior to payment. The approval workflow will be composed of reviewers from the entities delivering the programs, including Program Implementers and Program Administrator staff.

The application approval workflow reviewers will consist of experience staff trained on the program participation and eligibility requirements, measure eligibility and requirements, and proper documentation and data needs. Reviewers will have an understanding of residential energy efficiency technologies and practices. Trainings will focus on HOMES program policies and procedures, application review standards, training on the IT systems they will work with, and data review procedures. Checklists with all required data points and review criteria, guides, and tools will be provided to aid in the approval process.

Data collected will be maintained for six years from the project completion date.

Program Implementers will review and confirm, at a minimum, the following information for accuracy:

- Auditing tools and modeling software are on the list of the contractor's approved tools. A copy of the customer's reports will be required as part of the application documentation, if available.
- Copy of the home assessment report. A checklist with the home assessment requirements will be created and shared with application reviews. The checklist will cover:
 - Recommendation of properly sized unit by a HVAC Registered Contractor.

- Onsite visual inspection of the existing conditions of HVAC duct sealing and envelope.
- Estimate of utility bill impacts, along with written acknowledgement by the consumer, under the following situations:
 - If upgrade includes fuel switching.
 - If the upgrade falls within one of the State’s pre-defined set of home pre-conditions and/or the scope of work scenarios that will constitute unacceptable risk of raising utility bills. This includes but is not limited to the following:
 - Uninsulated home converting from natural gas to electric heating system.
 - Installation of equipment that is improperly sized for the home.
 - The home is within a region where electric rates are significantly higher than gas rates.
- Written acknowledgement from the consumer of the amount owed that is not covered by the rebates.
- Collection of the following data points and accurate entry in reporting and tracking system:
 - Unique home identifier (address).
 - Dwelling type.
 - Existing energy equipment/systems to be replaced, if any.
 - New energy equipment/systems proposed for installation.
 - Estimated total project cost. The total cost of all upgrades within a completed project invoice inclusive of any rebated amount.
 - All other datapoints listed as required in the Data & Tools Requirement Guide.
- Review of proposal and/or contract and invoice.
 - Scope of work is the same.
 - Same installation address on documentation, matches any reservation or rebate coupons issued for project.
- Scope of work meets program requirements.
- Project installation within a building that is not considered new construction.
- Rebate aligns with verified income category.

When discrepancies are identified between the reservation details and completion documents during the application review process, including but not limited to installation address, income levels, or

measures installed, the application will be removed from the payment review workflow. The reviewer will first contact the customer to confirm the correct information. If the reservation details were incorrect, the application reviewer will update the reservation with the correct information and determine if the customer is still eligible for the rebate applied for or if adjustments are needed. If the completion documentation is incorrect, the application reviewer will contact the installing contractor to confirm the actual installation address and request corrected completion documentation. If the application reviewer is unable to resolve the discrepancies, the application will be cancelled, and customer and contractor will be notified and provided with steps to appeal the cancellation.

The Program Implementer will issue the post-installation certificate to the household upon review and approval of the rebate application. A copy of the certificate will be uploaded to the reporting and tracking system. At this point, the application will advance in the workflow for Program Administrator review and approval.

In addition to spot checking the information reviewed by the Implementer, the following items will be included as part of the Program Administrator review and approval:

- Verification that the following application documents are uploaded and accurate:
 - Post-installation photos of major upgrades for each application. Reviewers will follow provided guidance to confirm the integrity and validity of the photos. Guidance may include auditing a sample of the photos, using AI to prove photo is unique to the specific project and address, or analyzing meta data, as identified by upcoming guidance from DOE.
 - Proof of combustion safely testing on fossil fuel equipment in homes where fossil fuel systems were impacted by the installation of new equipment.
 - Proof of commissioning testing on HVAC equipment in all homes where new HVAC systems were installed as part of the project.
- Installation details, including site address and customer name, match the information listed on rebate reservations forms

Home Assessment Data Review

The Program's Quality Assurance (QA) and Quality Control (QC) protocols will include the following elements to assess accuracy:

- Approved assessment and data collection tools will be required to include data validation checks and constraints to minimize data entry mistakes. These basic checks will be on both the input and the output side.
- Every project submitted for rebates will include a desk review by the Program Implementer. The Program Implementer will record irregularities and resolve issues with the Registered Contractor as needed.
- Should a Registered Contractor appear to consistently report extremely poor baselines inconsistent with the targeted housing stock, the Program Implementer will follow-up with calls to the households served by the Registered Contractor to better understand the households' perspectives of the work performed and outcomes.

- Registered Contractors who are flagged due to data collection anomalies or concerns (where found in no more than 25% of their projects) will be required to take additional training on conducting assessments to learn best practices.

Quality Control (QC) Inspections

The Program Implementer will be required to maintain records generated from QC inspections for a period of six years. Data points that must be retained include:

- Sampling rates (overall)
- Findings (per QC)
- Corrective actions taken if any
- Verification of conformance to program requirements (per QC)

Onsite Inspections

Due to the high entry thresholds established in the Registered Contractor Participation Agreement requirements, the state proposes that the first five (5) projects of each Registered Contractor will undergo a post-installation inspection. Registered Contractors that are current Focus on Energy Trade Allies already receiving post-installation QC visits will be exempt from this requirement. If issues are identified with the first five projects, an inspection will be required of the Registered Contractor's projects on a continuous basis until either five consecutive inspections are completed with no issues, or the Program Implementer has determined that ongoing issues with the installation have been resolved.

Upon the successful completion of the five post-installation inspections, a minimum of five percent (5%) of each Registered Contractor's projects moving forward will be inspected. A higher percentage of projects may be inspected if issues are identified during an inspection. Projects selected for inspection will be tracked within the program's tracking and reporting system and Excel spreadsheets, if needed. Inspection details to be tracked include date of inspection, results, and corrective actions, if required. The inspection report will be uploaded to the program's reporting system.

Projects from the Home Electrification and Appliance Rebate (HEAR) program and HOMES program will be included in the project count for the first five and ongoing 5% requirements for Registered Contractors.

Inspectors will be part of the core implementation contractor's team, trained on all aspects of the program requirements. Inspectors will be certified by the Building Performance Institute (BPI) with a minimum certification of Building Analyst Technician (BA-T). TREC funding will not be used for the training of inspectors.

Inspection protocols will be documented and provided to all inspectors. Acceptable tools and/or templates for capturing data and photos will be identified and inspectors will receive training on proper use of them. Copies of the inspection reports will be uploaded to the tracking and reporting system. The inspection protocol will include:

- Visual inspection of the site and work conditions.

- Review of the scope of work/contract and invoice to verify that the installed measures match the contracted scope of work.
- Valid customer signature on the contract. E-Sign compliance for electronic contracts.
- Timestamped and geolocated photos of the installed equipment. If timestamped photos and geolocated photos are not available, an exterior photo of the building showing the house number/address will be required, in addition to the photos of the installation and equipment. Required photos will vary based on project type.
- Verification of the diagnostic tests, if applicable. This may be completed either by observing the Registered Contractor's testing or inspector testing.

Registered Contractors and other Partners

Contractor Registration and Listing

Businesses who wish to offer HOMES rebates to their customers must be listed on the Registered Contractors list. To be eligible for listing, the contractor must hold current business insurance, active home performance industry credentials relevant to the services being provided (e.g., BPI certification), a state license or must register with the state (when applicable). The program will review all documentation and confirm accuracy using publicly available tools and databases when possible. For example, BPI certification can be confirmed by performing a search using the [BPI 'Find a Contractor' tool](#) available on the BPI website; state license numbers can be confirmed using the [Wisconsin Credential/License Search](#) available on the Wisconsin Department of Safety and Professional Services website. The state will continuously evaluate methods of verifying credentials and implement those methods when identified.

The program will develop and publish a Registered Contractor registration application. The application will be used to collect contact information, office or warehouse address, payment data and supporting documents from contractors who would like to offer IRA Home Energy Rebates to their customers. Parties interested in being listed on the Registered Contractors list will be required to complete the registration form, agree to the Participation Agreement, and submit all required documentation as specified on the application.

Specific credentials and required trainings will be determined prior to the Registered Contractor registration application going live. The application will detail all acceptable credentials and documents that will be required for different trade groups. The program will also provide registration details including a link to the application and Participation Agreement, and a list of all required credentials and documentation, to the current Focus on Energy Trade Ally network via email prior to program launch.

Documentation must include:

- Proof of business insurance.
- Proof of state license, if applicable.
- Proof the business is registered with the State of Wisconsin.
- Proof of successful completion of approved training, when applicable.
- W9.

- Certificate of insurance showing current general liability or equivalent coverage.

The Program Implementer will review registration applications within 2 business days of receipt. During application review the Program will verify documentation as described above, confirm all required fields have been completed, confirm the applicant is either not registered or is a current Focus on Energy Trade Ally in good standing, and confirm that the business does not appear on the Department of Treasury's [Do Not Pay list](#). An application may be returned or rejected if it is missing any information or if the Program requires clarification on any fields.

Once an application is approved the Registered Contractor will be listed on the IRA Home Energy Rebates Find a Registered Contractor Tool located on the Program's website.

Focus on Energy does not currently require a W9, state license, or insurance documentation to be on file for all Trade Allies. Additionally, not all Focus on Energy Trade Allies will wish to offer IRA Home Energy Rebates to their customers. Therefore, to ensure the integrity of the list and contractor network, all businesses who wish to offer IRA Home Energy Rebates will be required to complete the registration application. This includes current and former Focus on Energy Trade Allies, registered retailers, and distributors.

Projects completed by contractors who are not registered are not eligible to receive HOMES Rebates.

Registered Contractors may choose to withdraw from the IRA Home Energy Rebates Program at any time by notifying the program in writing. The Program Implementer must notify the Program Administrator of a Registered Contractor's withdrawal request. The Program Implementer staff must also update the business' account to reflect they do not offer IRA Home Energy Rebate programs in the database of record within 1 business day. In addition, the Program Implementer will note and upload the withdrawal request to the account. Once the Program Administrator received the notification the account will be reviewed to ensure the proper changes have been made. The Registered Contractor will subsequently be removed from the list (delisted). Removal from the list in these circumstances will take no longer than 3 business days. All documentation provided by the former Registered Contractor will remain in the database of record.

Contractors Trained Under IRA 50123

The Wisconsin Training for Residential Contractors (TREC) program, as established through IRA Section 50123, anticipates a program design with DOE approved training and certifications for the following job sectors: Energy Auditors, HVAC Contractors, Plumbers, Electricians, and Home Performance Contractors. These trainings and certifications will meet DOE requirements established in IRA Section 50123, with the intent that these trained workers will assist in implementation of IRA Home Energy Rebate program projects across the state. The Wisconsin TREC program will recruit new and current contractors into training and certification programs. Contractors who successfully complete training as part of IRA Section 50123 funding will become eligible to be listed on the Registered Contractor list upon completion, however, the contractor will still need to register their business and agree to the Participation Agreement.

Delisting

Registered Contractors can be removed from the Registered Contractors list for:

- Failing to adhere to Program requirements (i.e. Failing to adhere to the Participation Agreement).
- Failing to adhere to the conflict resolution process.
- Receiving multiple customer complaints for the same issue and failing to take corrective action once the issue is identified.
- Any other reason the Program deems necessary.

Ramifications for non-compliance with areas above:

- First confirmed offense – written warning, notice to cure.
- Second confirmed offense – indefinite suspension from all IRA Home Energy Rebate programs and removal from Registered Contractor list.

The full procedure will be in the Participation Agreement.

Tools and resources

Prior to launch, the Program will publish a list of approved tools (e.g., Modeling tools, home assessment tools, or software) and job aids on the Program website. The Program will adhere to requirements according to statute.

Post registration, the Registered Contractor will be contacted by the program to explain allowable tools relevant to the Registered Contractor's services offered and provide information on training available.

Installation

The State of Wisconsin will provide guidance and direction to installing Registered Contractors for completion of quality installations that meet industry standards, including ensuring they comply with local and state laws, permits, and codes. The State will follow standards developed and vetted by industry experts, including ENERGY STAR®, Air Conditioning Contractors of America (ACCA), and National Renewable Energy Laboratory (NREL). The guidance will address correct design, proper installation, and final testing of the equipment per project type. The guidance will be available on the HER programs webpage prior to program launch.

The State of Wisconsin will include language within the Registered Contractor registration application stating the contractor must comply with all applicable laws, ordinances, regulations, and codes regarding the installation of the equipment.

Registered Contractors must ensure that sales language and contract language are the same.

The scope of work provided to the customer will be a detailed listing of the home improvement measures. The scope of work will specify equipment recommendations and include the installation requirements and conditions. The scope of work should also indicate the optimal completion order of the measures to maximize energy savings.

Installation of the measures will be completed in an order that prevents potential ensuing defects and maximizes energy savings. Equipment and materials must be installed according to the manufacturers' installation instructions. Materials and installation methods will be consistent with a building science-based approach to maximize savings, minimize indoor air quality problems, minimize moisture accumulation, and ensure maximum operating capacities of the installed equipment.

Registered Contractors will complete a Quality Assurance (QA) review of each project. Depending on the scope of work, the QA requirements may include a visual inspection, commissioning of the system, diagnostic testing, and combustion safety testing. The Registered Contractor will provide the QA documentation as part of the application, including photos of the installed equipment and materials.

Projects involving HVAC upgrades

Projects involving HVAC equipment assume that HVAC equipment and components are in new, factory clean condition. Contractors will ensure that the HVAC design will include ventilation and heat gain/loss load calculations, proper equipment sizing, and that indoor and outdoor equipment components are properly matched. During the installation, all applicable testing shall be completed, which may include airflow, electrical requirements, combustion venting, and proper functioning of system controls. The contractor will provide system documentation and educational support to the customer. This may include owner's manuals, warranty and service agreement information, maintenance plans, and recommended system settings.

Financing Considerations

If financing for the energy efficiency upgrade is provided to the property owner by the Registered Contractor, a written disclosure listing the number of payments, monthly payment amount, late fees, and other important payment terms is required. The Registered Contractor 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.

This disclosure must be provided to the customer in advance of contract signing, with a 7-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 (3) day window after the contract is signed and before work begins, in which the property owner has the right to cancel the contract.

Protections for Low-Income Rental Housing Tenants

Tenants of low-income rental housing will be provided with additional protections by the State to maintain the affordability of the dwelling units for a minimum of two years after a rental property receives a HOMES rebate. The protections include:

- The owner agrees to rent the dwelling unit to a low-income tenant.
- The owner agrees not to evict a tenant to obtain higher rents based upon the energy improvements.
- The owner agrees not to increase the rent of any tenant of the building as a result of the energy improvements. An exception to increase rent is allowable to recover actual increases in property taxes and/or specified operating expenses and maintenance costs related to the energy improvements.
- A verifiable mechanism is in place for providing tenants with written notice of their rights and the building owner's obligations. An addendum to the tenant's lease is the recommended mechanism.

- The owner agrees that if the property is sold within two years of receipt of the rebates, the above conditions apply to the new owner and must be included as part of the purchase agreement.

The protections will be available on the program's website. Templates will be available to low-income rental property owners to notify their tenants of these protections. The property owners will agree to these conditions as part of the enrollment and reservation request process. In the event that the Program or State of Wisconsin is notified that owner does not comply with these requirements, the owner must refund the rebate within 60 days of the State's request for refund.

Continuous Improvement

Preventing Waste, Fraud, and Abuse

The State of Wisconsin is committed to preventing all instances of waste, fraud, and abuse. To prevent these issues from occurring Program staff will review all rebate applications to ensure they meet acceptable standards. As such, the State will take the following steps to identify, mitigate, and reduce fraud, waste, or abuse, as well as unfair business practices.

The State will require desk review Quality Control (QC) at all stages of payment approval to check for fraud, data integrity, and accuracy. At minimum the reviewer will check for duplicate submissions, duplicate addresses, all required documentation is present and complete, that the installing contractor is on the Registered Contractors list, and payments are being made to the correct entity. The State will create a desk review QC guide outlining QC best practices and review requirements. The best practice guide will be reviewed on a biannual basis to ensure the requirements are relevant to the current state of the program.

The State will identify opportunities to verify the legitimacy of contractors before adding them to the Registered Contractor list. The registration review will include checking the U.S. Department of Treasury Do Not Pay system to confirm the contractor is not listed. Appropriate business registries will be consulted to confirm the validity of the business and its address. The State will identify relevant state databases that could be utilized to verify the existence of the business and formal complaints against the business that involve fraud.

Households that use self-attestation as their method of income verification will consent to grant access to the Program to review the household's tax records to ensure income eligibility requirements were properly followed. Self-attestation will only be allowed in situations in which the household experiences an emergency and needs immediate replacement of HVAC equipment.

The Public Service Commission also has established processes to refer items to different state agencies depending on the issue. For payment default issues, the Commission can refer items to the Wisconsin Department of Justice (DOJ) and in the past has worked with the Wisconsin Department of Revenue (DOR) when an individual or entity has defaulted on a loan and entered into a collection's agreement. For consumer protections issues, such as business misrepresentation or fraud, the Commission can refer these matters to the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP). Consumers can also file a complaint directly with DATCP. The Commission also has an internal complaint

process under Wis. Admin. Code chs. PSC 113 and 134 for consumers to file complaints and request a formal review process.

Protecting against artificial cost inflation

To ensure Registered Contractor costs are not artificially inflated, each quarter the State will randomly sample 25% of invoices submitted to compare costs. To establish an average cost the State will review costs of invoices submitted to the IRA Home Energy Rebate programs, historical Focus on Energy costs when applicable, and average costs provided by relevant state agencies.

If some Registered Contractors' costs are consistently higher than others within the same geographical regions of the state, the Program Implementer will be required to issue a written warning to the Registered Contractor and require them to substantiate their costs within 30 calendar days of receipt.

The Program Implementer will review the Registered Contractor's response and either accept the Registered Contractor's reasoning or provide a recommended course of action to the contractor within 14 business days. The recommended course of action will be determined by the Implementer. The course of action can include, but is not limited to, a requirement to provide justification for higher-than-average costs for an appropriate length of time to be determined by the Program Implementer, or having more than 5% of the Registered Contractor's projects reviewed for a period of time determined by the Implementer. If the Registered Contractor fails to adhere to the terms of the course of action, the Implementer and the State may take action to remove the Registered Contractor from the Registered Contractor list.

During the review period the Registered Contractor may still perform work for the Program. All the Registered Contractor's applications will be subject to a desk review during the review period. Costs will be closely monitored and noted during this period.

All communications will be documented on the Registered Contractor's account in the database of record.

Registered Contractors can appeal the Program Implementer's recommended course of action. In the event of an appeal the Implementer will review the case with the Program Administrator. The State may either uphold or amend the Implementer's recommended course of action.

Automation

Through the implementation of the Focus on Energy program the State has become familiar with the aspects of the rebate fulfillment process that commonly require attention. Focus has implemented many automated processes to ensure the integrity of data received and improve on the customer experience.

One such example is the use of online forms with built in logic as the primary rebate application. By configuring form fields to limit user inputs the program has been successful in decreasing the overall number of incomplete or invalid submissions. Once the program began to see an improvement in quality of online submissions, the program began to encourage the online form to be the primary application method for customers. The State plans to exclusively utilize online forms with built in logic for IRA HER programs to ensure the data received is high quality.

Another automation opportunity may be the integration of screening technology to review standard information like 1040 forms or enrollment documents for specific programs.

Furthermore, the State will develop a plan to review all additional functions that can be automated and analyze steps needed to incorporate efficiencies within the program procedures and systems.

Evaluating QA Systems

In addition to evaluating incidents and contractor verifications, inspections are a useful tool for monitoring program performance and ensuring standards are being met. As a Home Performance with ENERGY STAR program sponsor, Focus on Energy has years of experience with evaluating processes to inform program improvements. Focus accomplishes this through thoroughly recording QA/AC inspection findings and analyzing trends. A past example of this process is when the program identified and remediated issues with improper installation of insulation in attic hatches. During review of routine QA inspection notes, Energy Advisors noticed a trend in contractors improperly installing insulation in attic hatches. In response to this finding, the program developed and delivered new in-the-field training to all contractors working on the program. The training resulted in drastically improved QA findings and an overall better educated workforce.

In line with Focus on Energy's existing QA evaluation process, the State will continuously evaluate the efficiency of all QA systems and processes. The State will make updates when process improvements are discovered and tested.

Budget and Financial Evaluation (Roles and responsibilities)

Public Service Commission (PSC) staff will oversee the overall program budget and expenditures by all contractors and sub-contractors. The Division of Business Operations and Office Management at the PSC will provide financial oversight and provide approval for the distribution of funds and provide support for managing the financial reporting of the program.

All contractors and sub-contractors will track rebate spend and ongoing expenditures, as appropriate and on an ongoing basis, based on their contracted scope of work. All contractors and sub-contractors will report on a monthly basis to the Public Service Commission. They will work collaboratively with PSC staff to analyze financial performance and to prepare quarterly reporting for DOE.