



**Georgia Environmental Finance Authority  
Consumer Protection Plan  
IRA Section 50122**

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## **Introduction**

As the state of Georgia's administrator of the U.S. Department of Energy's (DOE) Home Energy Rebate Programs, the Georgia Environmental Finance Authority (GEFA) aims to deliver a program that meets Georgia's high standards for providing a quality consumer experience while protecting consumers from unfair business practices. Consumer protection is of the utmost importance to GEFA to meet the state's program delivery standards. GEFA is committed to protecting consumers throughout the program by maintaining an actionable consumer protection plan that will guide our implementation procedures and safeguard program funds. Additionally, a focus on continuous improvement will guide program operations from launch through program closeout. GEFA will be responsive to the feedback received from consumers, contractors, and various stakeholders participating in the program to improve the overall rebate processing experience. The Consumer Protection Plan will remain published on the program's website and accessible to all program participants affected by it, including implementers, participating contractors, third-party inspectors, aggregators, homeowners, and building owners.

## **Consumer Feedback**

GEFA will give consumers the opportunity to file complaints or share issues and concerns directly with the program. These communications will be captured via the contact center, a webform, or logged directly into Neighborly the program's rebate processing platform by rebate processing specialists.

## **Escalation Process**

The following process shall be undertaken for any program participant that requires an escalation:

- All participant escalations will be tracked in Neighborly for documentation.
- Escalations will be prioritized by type and aging status.
- Escalations will be assigned to a rebate processing specialist for review and updates.
- Any necessary description of action steps being requested to resolve the issue.

Examples of escalations include (but are not limited to):

- Media inquiries
- Office of the Attorney General complaints
- Better Business Bureau complaints
- Matters related to policy or ineligible applications that need to be either rejected or returned to applicant
- Other examples that require immediate attention or resolution

The purpose and benefit of this escalation process is to create a streamlined approach to collect, resolve, and monitor escalations as they are received. It is imperative that an application is not dependent on any one individual as the single point of contact, hence the use of Neighborly to manage escalations and regular monitoring by a team of staff. This process aims to minimize and hopefully eliminate staff and consumer frustration regarding outstanding escalations that require a resolution.

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

The program will leverage feedback and lessons learned to update the Consumer Protection Plan every two years. The updated plan will be published on the program website and communicated to contractors, aggregators, inspectors, and the DOE. Consumer feedback will follow improvement processes as indicated in the Continuous Improvement section within this document to ensure feedback is incorporated into the next program rollout cycle. Positive feedback will be used to reinforce best practices across the contractor pool, aggregators, eligible entity representatives, retailers/distributors, customer service representatives, and rebate processing staff. Negative feedback will reveal needed improvements on informational materials, trainings, adjustments on requirements, etc. GEFA will implement efforts to address negative feedback with the appropriate parties through remediation, education, and performance improvement to address negative feedback.

### **Consumer Satisfaction Survey**

Consumers whose projects are selected to receive onsite QAQC inspections will be given the opportunity to provide feedback at the time of the inspection. Feedback received at inspection will be incorporated into the program's performance evaluation and continuous improvement approach. In accordance with DOE guidance, GEFA will provide participants with the ability to provide feedback via a survey no sooner than three months and no later than six months after the project's completion date. For any home receiving a QAQC inspection, the field staff will inform the homeowner that an additional survey will be sent providing an additional opportunity to provide feedback about their project and the program. This will ensure consumers who interact with the program at different touchpoints will have the opportunity to provide feedback on their experience from interactions with contractors/installers, customer service representatives, and rebate processing staff to the application portal.

### **Resolution Procedures**

GEFA understands that disputes between program participants and parties representing the state or affiliated with the program will arise in the process of delivering home energy rebates across the state of Georgia. GEFA will establish transparent and comprehensive issue resolution procedures to address these disputes. The resolution process will be documented and tracked in the application profile of the homeowner/building owner.

Avenues of conflict could include homeowner/building owner complaints, inability to uphold standards of license, timeliness, communication, or professional status. The following is an example of the conflict resolution procedures the program will enforce to resolve disputes between homeowners/building owners and contractors/aggregators/eligible entity representatives.

- Complaint/loss of status made evident to implementer.
- Implementer response within one business day of receipt.
- Contact made between appropriate parties to review context and discuss next steps within three business days of implementer's response.
- The defined conflict resolution procedure and Service Level Agreements (SLAs) must be acknowledged and agreed upon through a signed agreement prior to commencement of engagement in the scope of work related to the conflict.
- Timely completion of correction/improvement plan agreed upon by the homeowner, contractor, and implementer. Timeliness will be dependent upon the size of the project issue.
- Completed detailed notes and implementer approval to be completed within one week of case being closed.

### **Remediation Process**

Qualified contractors, retailers/distributors, aggregators, and other program partners are subject to meet the performance standards set by DOE and GEFA throughout their involvement with the program. Any violation of these

standards may lead to a contractor being delisted. The following section identifies the standards contractors and other partners will be held to and the remediation procedures that will be taken.

- Contractors must have their first five projects inspected for quality control. This will include both in-person and virtual inspections.
- Contractors must have their first five rebate applications inspected for quality control.
- Contractors must keep their licenses, certifications, and necessary insurance(s) up to date.
  - The program will track expiration date.
  - Notifications will be sent to contractors 60, 30, and 7 days prior to license/certification/insurance expiration.
  - Contractors must upload current copies of required documentation to the program implementer.
  - Account managers will follow up if the appropriate paperwork is not received prior to the expiration date.
  - If licenses or certifications lapse, existing jobs will be delayed or rescheduled until documentation is received by the implementer.
  - If licenses or certifications lapse for 90 days or longer, the contractor will be removed from the participating contractor list. Future return will be evaluated on a case-by-case basis.
- Complaints will be addressed in a reasonable time frame.
  - Contractors will be responsible for making the customer whole. This may include but is not limited to: correcting inaccurate invoices, repairing or paying for damaged property, addressing incomplete or substandard installations, and failure to comply with program requirements.
  - Contractor must create a clear plan for resolution within three business days of receiving a customer complaint and must acknowledge customer complaint has been received within one business day.
  - Continued communication is expected between the contractor and the homeowner until the resolution is complete to expectations, including providing reassurance, etc.
  - It is the goal to keep contractors participating in the program and assist in resolution, as needed, with the intention of consistent improvement, shared education, and mutual respect for all involved parties.
- General Response time – The expectation is for contractors to respond to their customers within one to two business days of any inquiry/call.
  - Complaint calls should be escalated and returned ASAP or within one business day, as mentioned above.
  - This is inclusive for all communication throughout the life of any project: initial calls, follow up questions, project process, scheduling, wrap up, etc.
  - If the program/implementer is made aware of poor communication via the customer call center, the issue will then be logged and tracked by the implementation team.
  - Resolution time – Steps to resolution or completion of a project will depend on the project and/or complexity of request.
- If any of the above listed items are not addressed in a timely manner, a Performance Improvement Plan (PIP) will be created and implemented. These formalized agreement plans will be implemented to address egregious or recurring issues. If a contractor cannot uphold the improvement agreement in the time frame agreed upon, that will begin grounds for removal from the program. Our goal is to facilitate consistent improvement while upholding the stringent standards of the program.
  - Plans will be formalized and in writing to be agreed upon and signed by all relevant parties. Details will include:
    - Detailed description of incidents/non-compliance.
    - Feedback provided by the homeowner, field crew, and/or contractor team.

- Detailed plan for improvement with set time frame of expectations.
  - Signatures and agreements from all relevant parties – implementor, contractor, and homeowner, if needed.
- Inspections will be conducted on every job until the implementer is satisfied, all issues have been resolved and a clear understanding is communicated by the participating contractor. This may carry over to the next one to two jobs or over several months.
- If the quality of the work does not improve or the overall performance of the contractor remains low, the contractor will be at risk of suspension or expulsion of the program.
- Any PIP or serious issue found in the field will be shared across any relevant programs. (i.e. utility and state)
- Contractors, retailers/distributors, aggregators, and other program partners who are found guilty of practicing extreme negligence, misleading invoicing practices, or lack of overall performance improvement will result in suspension or delisting/expulsion from the program. It will also be recommended that they be added to the [Do Not Pay](#) list maintained by the U.S. Department of the Treasury.

### **Contract Compliance**

For all contracts, GEFA will ensure compliance with the following DOE requirements:

- Contracts associated with the Home Electrification and Appliance Rebates Program (Section 50122) will not contain mandatory arbitration clauses.
- Inclusion of the holder-in-due course rule so consumer protections are not lost just because the contract is assigned to a third-party creditor.
- Ensure that sales language and contract language are the same.

### **Data Review**

Data validation controls will be a critical component of the program's quality assurance procedures. Data submitted to the program for all projects via the contractor or program participants will be subject to a comprehensive data or file review. This review will be conducted by personnel who have undergone training administered by GEFA on program requirements for data review. Data or file submissions will be reviewed to validate the following program requirements are met, at a minimum:

#### ***Data Validation Controls***

- Auditing and modeling will be done using software that has basic data validation controls on inputs to ensure data quality.
- SnuggPro is the modeling software GEFA intends to submit to DOE for approval.
- SnuggPro is a cloud-based BPI-2400 compliant home energy auditing software that runs on computers, tablets, and smartphones.
- The state will outline business procedures to address data exceptions and train the appropriate staff for timely resolution and documentation.

#### ***Home Assessment Data***

- Home assessment data will be delivered as an HPXML file.
- Mini-assessments are required for heating and cooling projects.
  - Manual J is required to determine the buildings load requirements.
  - Manual S is required to determine the proper equipment for the home, considering its size, efficiency, and capacity.
  - Manual D is required if the system requires a duct system.

- Note that for **Home Electrification and Appliance Rebates (Section 50122)**, home assessments are only required for projects that include an electric heat pump for space heating and cooling and/or the building envelope.
- Full energy assessments, including a pre- and post-blower door test, are required for any upgrades involving building envelope improvements and gas appliances.
- SnuggPro will provide estimated measured/deemed savings. The homeowner will be informed that their behavior is a large component to energy savings and the numbers may vary from the original estimate based on actual usage.
- Verification of estimates and actual savings will be tracked on the assessments and logged within the individual project page in Neighborly.
- The program will follow the standardized data specifications and guidelines within the IRA Home Energy Rebates: Data and Tools Requirements Guide for data captured within the assessment to ensure data compatibility.

#### ***Scope of Work Requirements***

- The program will develop a standardized scope of work template for implementers consistent with program requirements to ensure program requirements are met. The program will require the implementers to use this template to capture necessary information and provide guidance on program requirements.
- The program will verify that the scope of project aligns with details reported in the rebate application. Any rebate or incentive application where the claimed scope of project cannot be validated will be labeled as flawed and cannot be paid until the scope of project has been corrected or verified.
- SnuggPro will provide estimated measured/deemed savings. The homeowner will be informed that their behavior is a large component to energy savings and the numbers may vary from the original estimate based on actual usage.
- Verification of estimates and actual savings will be tracked on the assessments and logged within the individual project page in Neighborly.

#### ***Installation Address Verification***

- For a rebate application to be considered valid, there should be sufficient evidence, in either the application (geo-coded photos, etc.) or as part of the QA process, to validate that the address listed is the location of the equipment installed. Any rebate or incentive application that cannot be validated through appropriate measures will be labeled as flawed and cannot be paid until appropriate measures have been corrected or verified.

#### ***Income Category Verification***

- The program will develop a standardized scope of work template for implementers consistent with program requirements to ensure income category requirements are met. The state will require the implementers to use this template to capture necessary information and provide guidance on program requirements.
- Where applicable, the program will implement an automated procedure for verifying that a participant's income category aligns with the appropriate rebate amount. A notification will be sent to the contractor and participant confirming the income eligibility determination and rebate award amount.

#### ***Post-Installation Certificate Receipt***

- All completed projects under the Home Efficiency Rebates program will receive a post-installation certificate from a qualified third party to confirm quality monitoring and accurate valuation of the upgrade. All certificate issuing parties will be subject to guidelines established by the state to ensure clarity, uniformity, accessibility, and compliance with DOE requirements.
- The program will develop a standardized scope of work template for implementers consistent with program requirements to ensure program requirements are met. The state will require the implementers to use this template to capture necessary information and provide guidance on program requirements.

- GEFA will ensure each certificate issued meets the following criteria, at a minimum:
  - Is completed and certified by a qualified third party.
  - Is provided to the household.
  - Details the work performed, equipment and materials installed, projected energy savings or energy generation to support accurate valuation of the upgrade.

### **Data Records Maintenance Procedures**

GEFA will maintain QC inspection data in accordance with the standards outlined in the Data and Tools Requirements Guide. All documentation from QC Inspections will be stored in Neighborly including, but not limited to, the following:

- Post-installation photos of major upgrades / the equipment included in each qualified electrification project for all homes.
- Proof of combustion safety testing on fossil fuel equipment in all homes where fossil fuel systems have been impacted by the installation.
- Proof of commissioning testing on HVAC and heat pump water heater equipment in all homes where HVAC systems are installed.
- Description of data retention plan.
- Description of the training or credentials of personnel who conduct data/file review.
- Detailed notes and pictures are required to explain the findings and verify any improper installation was remedied.
- Record of corrective actions taken.



### **Data/File Reviewer Credentials**

Qualifications for the person(s) that will be tasked with Data/File Reviewer responsibilities will be as follows: bachelor's degree or equivalent experience, the Home Energy Professional (HEP) Quality Control Inspector certification, and completion of identified yearly compliance training. The Data/File reviewers for the program will be required to undertake compliance training administered by the program on the following topics, at a minimum:

- How to Use Neighborly
- Minimum Eligibility Requirements
- Documentation Requirements
- Data Quality Standards

### **On-site and Virtual Home Inspections**

Conducting regular post-installation QC Inspections will strengthen the program's ability to meet quality installation standards and promote a culture of providing excellent service amongst our contractor network. GEFA will enforce the following requirements to ensure home inspections for projects that received a home assessment are compliant with DOE and GEFA's Installation standards. In this section, we detail the protocols, credentials, and minimum requirements for on-site and virtual inspections.

### **QC Inspection Protocol**

All projects that included an electric heat pump for space heating and cooling are required to undergo the following QC Inspection protocols:

- The program will define and document a process for coordinating inspections with the third-party inspection entity and relevant contractors. The independent on-site post-install inspections will be conducted in a timely manner and coordinated in conjunction with the home/building owner/manager to avoid imposition and an unsatisfactory consumer experience.
- An independent post-install inspection will be conducted on a minimum of:
  - The first five projects of new contractors / contracting organizations; and
  - Five percent of projects thereafter for each contractor (provided no issues are found).
- To encourage quality and continuous improvement amongst the contractor network, GEFA will maintain protocols for discipline and remediation based on data from post-installation inspection results, customer satisfaction survey, and compliance with installation standards.
- As qualified contractors complete projects, GEFA will monitor outcomes. Contractors who have a failed inspection rate that exceeds the value the state determines will face disciplinary action and remediation activities.

### **Independent Inspectors**

Independent inspectors must meet the following training, credentials, and/or qualifications requirements:

- QAQC staff should possess BPI certification of at least the minimum required by the program.
- QAQC staff should have at least two years of field experience in energy efficiency or a relevant field.

### **On-site Inspections**

The following requirements must be met for all on-site inspections:

- A visual inspection of the site and work conditions.
- Use of appropriate personal protective equipment (PPE) during installation.
- Verification that the installed measures/upgrades match the contracted scope of work and any change orders have been appropriately documented.

- Verification that diagnostic test results are accurate (may be directly observed if the inspector is present at the time of testing or repeated by the inspector).
- Ensures compliance with E-Sign or prohibits the use of electronic devices and signatures to enter into the contract if not E-Sign compliant.
- Material/product integrity/failure
  - Proper curing of foam products and or tape
  - Proper working conditions of new equipment, i.e., light fixtures, HVAC equipment, appliances, thermostats, etc.
  - Compliance with local code requirements for fire, installation, access, etc.
  - Compliance with manufacturer's install recommendations
  - Verification of final inspection (schedule or final inspection paperwork)
  - Verification of proper permits from local authorities

### **Virtual Inspections**

Virtual inspections will provide participants and contractors with an alternative to on-site inspections to ensure quality of installations in accordance with the program standards. In addition to the requirements of the on-site inspections, virtual inspections will meet the following requirements, at a minimum:

- Include a description of the methods used, e.g., video recording, interview with the site contact, photos taken during the virtual tour.
- If a program participant declines virtual recording of their home, an on-site inspection will be used.
- Include a description of verification of installed equipment, e.g., test out, run time, etc.
- Virtual Inspectors must submit project documentation via Neighborly e.g., invoices, specification sheets, calculation models, permit and inspection paperwork.
- Virtual inspectors must be up to speed on code requirements, equipment installation requirements, local inspection requirements, etc.
- Include a description of privacy agreements.

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

## Contractors and Other Partners

The Qualified Contractors List for Georgia's Home Energy Rebate Programs will be published on the program website to provide program participants with a centralized list of qualified contractors to hire for their installation. Contractors enrolled in the list must meet minimum program requirements for certification, licensing, and pass a background check. Prior to accepting or qualifying the rebate reservation, GEFA will verify that an installing contractor is certified throughout the program through the Contractor Participation Enrollment process. Contractors will be required to provide/meet the following requirements to enroll in the program:

- Proof of business/professional license and insurance
- BPI Analyst as a minimum certification
- Additional BPI certifications that are helpful/encouraged, but not required for the program.
  - Certificate: Building Science Principles, Healthy Housing Principles, Site Supervisor Certificate, Total Building Performance Certificate
  - Primary Certifications: Infiltration and Duct Leakage, Air Leakage Control Installer, Building Analyst Technician
  - Core Certifications: AC/Heat Pump Professional, Building Analyst, Envelope Professional, Building Analyst Professional, Heating Professional, Manufactured Housing
  - Multifamily Certifications: Multifamily Building Analyst, Multifamily Building Operator
  - Advanced Certifications: Crew Leader, Energy Auditor, Quality Control Inspector, Retrofit Installer Technician, Healthy Home Evaluator
  - Pass criminal background check(s)
- Drug tests and previous job history are not part of the program's background check.
- The following items will be considered a Failed Background Check:
  - Any active warrants or pending charges, which, if adjudicated as guilty, would result in a failed status.
  - Felony convictions
    - Any convictions that are older than seven years will be reassessed and considered for inclusion into the program,
    - For any felony, the individual is subject to an indictment, criminal information, arraignment, or other means by which formal criminal charges are brought in any jurisdiction.
    - Convictions involving fraud, theft, bribery, embezzlement, violent crimes, including assault, rape, attempted murder, certain weapons charges, etc., or a false statement in a loan application or an application for federal financial assistance occurring within the last five years.
    - Conviction, other than the enumerated fraud-related crimes noted immediately above, occurring in the last one year.
    - Any offense involving sexual assault and/or Inclusion on the registered sex offender list.
  - Certain misdemeanors
    - Some examples of misdemeanors in Georgia include: certain DUI offenses, domestic violence, falsifying documents, reckless conduct, shoplifting, simple assault/battery, trespassing, unlawful hunting of game, vandalism.
    - DUI and hunting offenses typically will not result in a failed status.
    - Any misdemeanor alleging violence, theft, or fraud will result in a failed status.
- QC inspections of first five projects and invoices.
- Rolling QC inspections throughout participation of the program on a randomized basis.

- Rebate applications will be assessed by the rebate processing team for cost analysis, appropriate line-item formatting, etc., on an annual basis.
- Validation that they are not on [Do Not Pay](#) list maintained by the U.S. Department of the Treasury.

### **Contractors Trained Under the Training for Residential Contractors (TREC) program (Section 50123)**

The state will work with the appropriate IRA 50123 program implementation teams to review and include contractors for consideration who are trained under an IRA 50123 funded initiative. Additionally, the state will conduct outreach campaigns to contractors that have completed the training under IRA 50123 to apply for inclusion on the Qualified Contractor List. Contractors who successfully complete training as part of IRA Section 50123 funding will become eligible to be listed on the Qualified Contractor List upon completion, however, the contractor will still need to register their business, meet program's additional eligibility requirements, and agree to the Contractor Participation Agreement.

### **Retailers**

The program will allow interested retailers to enroll by completing an enrollment form available on the program website. All enrolled retailers seeking to participate in the program will be required to meet the following criteria for enrollment:

#### **Retailer Install Pathway**

- Listed retailers must make available for sale eligible appliances for qualified electrification projects.
- Listed retailers have systems capable of providing rebates for qualifying equipment rebates.
- Listed retailers commit to submit rebate request to the implementer.
- Listed retailers must have a contractor network that meets program standards
  - Verification of appropriate licenses, certification, and background checks will be required documentation for the retailer contractor network.
  - Retail contractors/service providers will also be required to complete program training to ensure sufficient understanding of the installation standards and software functionality.

#### **Contractor Installed/DIY Pathway**

- Listed retailers who do not participate in the Retail Install Pathway will be able to engage in the program by serving as an option for participating contractors/customers to purchase eligible equipment. GEFA will encourage these retailers to be advocates for the program.

All enrolled retailers will be required to recertify their enrollment status on an annual basis to ensure requirements are met. If a retailer is unable to meet the requirements at any point over the duration of the program they will be delisted.

### **Distributors**

The program will allow interested distributors to enroll by completing an enrollment form available on the program website. All distributors seeking to participate in the program will be required to meet the following criteria for enrollment:

- Listed distributors must make available for sale eligible appliances for qualified electrification projects.
- Listed distributors are responsible for providing the rebate discount upfront.
- Listed distributors are responsible for maintaining active business licenses.
- Listed distributors are responsible for adhering to commitments made with participating contractors.

All enrolled distributors will be required to recertify their enrollment status on an annual basis to ensure requirements are met. If a distributor is unable to meet the requirements at any point over the duration of the program they will be delisted.

### **Enrollment Process**

All contractors interested in enrollment must complete an Online Contractor Application and provide the following information to meet eligibility requirements:

- Contact Information
- Licensing/Certification Information – with documentation and expiration dates
- General Liability
- Appropriate Automobile Insurance
- Workers' Compensation
- Business License
- Applicable Georgia Contractor's license
- Minimum Building Performance Institute (BPI) Building Analyst
- Company information
- Employee background checks – for ALL employees entering homes
- W-9 submission – signed and dated
- Signed Terms and Conditions

Once their application and required documents have been reviewed for eligibility, contractors that meet program requirement will be approved. Program acceptance will include the following activities:

- Welcome Email with Next Steps
- Assignment of Account Manager
- Enroll in Required Program Trainings
  - Rebate Processing Overview/Software Training
  - New Program Orientation
    - Overview of the program
    - Sales training and tactics
    - Utility Data access and analysis
    - Tips for success
  - SnuggPro training and certification
  - BPI Standard Procedures overview
- Schedule a follow up interview to answer questions, if needed.
- Sign up for QAQC for first five projects.
- Add to the Qualified Contractor List, publicly accessible

GEFA is committed to ensuring consumers are informed of best practices for identifying unfair business practices when engaging with contractors. GEFA will provide a resource in the form of a guide to inform consumers on what to look for in a contractor's quote and how they can report issues with their contractors or other program representatives. If found guilty of violating program standards, contractors will be subject to the remediation standards identified in the "Resolution Procedures" section.

### **Installation**

Installers must comply with DOE and GEFA's installation standards. Additionally, GEFA will ensure work complies with state and local laws, permits, codes, and industry standards. The following lists the activities/standards the program will enforce to ensure minimum quality installation standards are met:

- The following listed technologies can only be installed by a qualified contractor:
  - Heat pump water heater
  - Heat pump for space heating or cooling
  - Heat pump clothes dryer
  - Insulation, air sealing, ventilation
  - Electric wiring
  - Electric load service center
- Mandatory Codes are mandatory everywhere in Georgia by State Law
  - International Building Code (IBC), 2018 Edition
  - International Fuel Gas Code (IFGC), 2018 Edition
  - International Mechanical Code (IMC), 2018 Edition
  - International Plumbing Code (IPC), 2018 Edition
  - International Fire Code (IFC), 2018 Edition
  - International Energy Conservation Code (IECC), 2015 Edition
  - International Residential Code for One- and Two-Family Dwellings (IRC), 2018 Edition
  - International Swimming Pool and Spa Code (ISPSC), 2018 Edition
  - National Electrical Code (NEC), 2020 Edition
  - All the above Codes have Georgia State Amendments
- Permissive Codes are optional and must be adopted by the local government to be enforceable
  - International Property Maintenance Code (IPMC), 2018 Edition
  - International Existing Building Code (IEBC), 2018 Edition
  - National Green Building Standard, 2008 Edition
  - All the above Codes have Georgia State Amendments
- All work must comply with state and local building codes listed above.
- Establish minimum quality installation standards for rebated technologies.
- Promote use of standardized and sequenced procedures for developing a detailed project scope of work and how this will be communicated.
  - Establish project type based on home assessment and priority of needs.
  - Discuss homeowners' needs and plan for upgrades.
  - Recommend several options to the homeowner in a detailed bid. Each suggestion should include precise line items to clarify the cost breakdown of the project and rebate potential.
  - Discuss the preparation necessities and what to expect from the upgrade.
    - Discuss potential off-gassing or any other hazards to the homeowner. For example, spray foam insulation typically requires occupants to be out of the home for 48-72 hours after installation.
    - Describe contractor needs for a clear path and space for work to be completed. Request the homeowner prepare the area based on project requirements.
    - Contractors should be prepared to cover or remove shoes when entering a home.
  - Contractors must keep area as tidy as possible and fully clean up at the end of each workday.
- Schedule final inspection – Ensure, via documentation, that the installation meets all code and BPI requirements.
- Complete test in/test out – Example: combustion safety, blower door, etc.
- Building envelope upgrades require a blower door test in/test out to ensure ventilation safety and requirements are met.
  - Combustion Appliance Zone (CAZ) testing is required for any gas furnace or water heater upgrade with or without building envelope upgrades.
  - Manual S, D, and J testing is required for all HVAC upgrades.

- Wrap up with the homeowner so they are aware of the work completed and have had an opportunity to ask questions and verify all upgrades have been completed.
- Document the install for rebate verification with final invoice, rebate application, and photo proof.
- Submit rebate application.

### **Compliance Standards**

GEFA will ensure the proper permits are pulled prior to any qualified upgrade. Contractors will also be encouraged to follow Energy Star recommendations. Contractors will discuss scheduling, logistics, and best practices with the homeowner prior to proceeding with work. This can include, but is not limited to procurement, permitting, code inspections, labor needed for installation, space requirements, and unexpected system upgrades.

## **Building Envelope Standards**

The state will educate contractors and building owners to prioritize investment in envelope improvements that have the greatest impact such as air-sealing and insulation to reduce air leaks, thus reducing costs. All building envelope projects are required to have a pre- and post-blower door test. Gas appliance, water heater, and HVAC projects will require a CAZ test. Electric HVAC projects are required to conduct “mini-assessments” in the form of Manual J, S, and D calculations.

### **Insulation and Air Sealing**

- All wiring, lighting, plumbing, etc. work should be completed prior to air sealing and insulating either attic or crawl spaces.
- It is most ideal to remove all old insulation prior to air sealing. It is not always feasible or cost effective, but it does provide easy access and views to all potential penetrations and top plates.
- The attic or crawl space access points should also be air sealed/weather-stripped and insulated. In the case of an attic hatch, build a rigid (not cardboard) insulation dam to prevent loss of insulation material when entering or exiting the space.
- Once air sealing is completed and new insulation is brought up to an appropriate level, ideally, that space should not be entered again.

### **HVAC**

- The envelope of the home should be tightened prior to sizing a new HVAC system. This provides the most accurate load estimate and ensures proper sizing of the system using the Manual J, S, and D tests.
- All accessible duct work should be assessed to determine if there are any gaps, cracks, etc. Conduct a duct blaster test to assess areas you cannot access (behind walls, under floor) to determine if there are any problem areas.
- Ensure the electrical panel can handle any additional loads that the new unit will produce.

### **Lighting**

- Ensure existing wiring or ballasts are compatible with updated bulbs.

### **Thermostat**

- Ensure existing wiring is compatible with the updated thermostat.
- Ensure the homeowner has been instructed on how to use the new unit.

### **Appliances**

- Ensure existing wiring is compatible with the updated appliances.
- Discuss disposal/removal of the existing appliance prior to delivery/installation of the new appliance.
- Ensure the capacity of the new appliance is sufficient for your home and the number of occupants.
- Determine if any additional ventilation is needed for the new appliance.

## **Enforcement Procedures**

GEFA will have processes to enforce installation standards, including QA processes that allow the state to verify and document whether installation standards have been met. GEFA will continuously verify that minimum quality installation standards for rebated technologies are met during QC Inspections. Enforcement of the installation standard will be in accordance with the remediation standards identified in the “[Resolution Procedures](#)” section.

QAQC inspections consist of three sections. Contractors will be scored based on the customer interview, the project installation, and the follow-up performance.



- Customer Interview – worth 10 points
- Project Installation – worth 100 points
  - 0 points – serious safety issues found
  - 25 points – less immediate safety or moisture issues, major deficiencies found related to items listed on the work order
  - 50 points – combustion safety requirements met but several technical deficiencies observed
  - 75 points – meets installation standards with minimal room for improvement.
  - 100 points – performance meets all technical standards and program requirements.
- Follow up Performance
  - 0 points – if resolution is not addressed within 25 calendar days
  - Score can be bumped up to 50 points – if resolution is addressed within 25 calendar days
  - Score can be bumped up to 75 points – if resolution is addressed within 15 calendar days

Account Management staff will continue with support with regular weekly/biweekly check-ins with the contractors throughout this process. Performance Improvement Plans (PIP) will be implemented for recurring and/or egregious errors. Please see details provided in the “Remediation Process” section about the approach to PIPs.

## **Financing Procedures**

During contract development and review for program participants requiring financing, GEFA will enforce the following procedures:

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

## **Continuous Improvement**

As part of our continuous improvement approach, GEFA will provide consistent monitoring and transparent reporting of key performance indicators (KPIs) and specific, actionable feedback. GEFA will take steps to identify, mitigate, and reduce fraud, waste, abuse, and unfair business practices by developing a series of manual and automated controls designed to ensure consumer protection and safeguard program funds. Once identified, potential red flags will be reviewed and resolved prior to processing an application further. To aid in the process, various data points collected through Neighborly may be used to inform the control design to facilitate identifying potential suspicious applications. Additional items will be identified through the QA procedures to ensure our approach is responsive to the program's operations.

### **QA Systems Evaluation Approach**

Throughout the design and implementation of the program, the identified risks and controls will be continuously evaluated and adjusted if necessary to adopt to changing behaviors and lessons learned. Additionally, GEFA will utilize the findings from stakeholder engagement, consumer satisfaction data, and programmatic data to monitor and evaluate the success of the program's QA systems. The use of reporting and dashboards will allow GEFA to have heightened visibility into the program's pipeline, each step of the participant journey, and program touch points for

continuous improvement opportunities. With these program and consumer insights, we can quickly adjust and modify the Consumer Protection Plan based on program performance to meet key state objectives and goals. Revisions or updates to the Plan will be provided to DOE.

### **Home Assessment Data**

For **Home Electrification and Appliance Rebates (Section 50122)** projects, GEFA will review home assessment and project data received to verify the accuracy and contact the homeowner if further information is required. In instances where the data is detailed enough, i.e., including photos and detailed invoices, no homeowner contact will be required.

### **Monitoring Program Budget and Financial Performance**

Ensuring program funds are being spent efficiently, effectively, and transparently with Georgians is foundational to GEFA's management of the Home Energy Rebate Programs. Through data collection, quarterly and annual reporting, and dashboarding, GEFA will be constantly monitoring the program's Budget and Financial Performance for the duration of the program to closeout. GEFA will define the key roles and responsibilities for monitoring and reporting on program financials in the Consumer Protection Plan.

### **Low Income Rental Housing Requirements**

GEFA's Consumer Protection Plan includes tenant protection measures such as restrictions on rent increases, evictions, and lease covenants/amendments. These protections and owner obligations will be communicated to individual tenants of approved projects through First-Class mail and will include reference to program resources for additional information. The tenant protections will be a condition of rebate eligibility for owners of low-income dwellings. GEFA will educate owners on the program's tenant protection standards via detailed resources and inform them of the risk for clawbacks if they are found to have violated the requirement. The program's tenant protection approach will also include a set of standards to support the safety of residents residing in buildings undergoing improvements. These include measures to support or provide for fire safety, health considerations, and noise restrictions. Expert advisory groups will be used to review and provide compliance feedback on the plan throughout the pilot and program implementation.

GEFA will comply with the following requirements for dwelling units occupied by low-income renters for at least two years following the receipt of a rebate. For all tenant-occupied properties that receive higher rebate amounts available only to households with incomes less than 80 percent AMI, GEFA will require the building owner to sign a statement acknowledging the following:

- The owner agrees to rent the dwelling unit to a low-income tenant. This is a minimum requirement and affordability requirements should be commensurate with total rebate amount awarded.
- The owner agrees not to evict a tenant to obtain higher rent tenants based upon the improvements.
- The owner agrees not to increase the rent of any tenant of the building as a result of the energy improvements with exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.
- The owner agrees that if the property is sold within two years of receipt of the rebates, the aforementioned conditions apply to the new owner and must be part of the purchase agreement.

If the owner does not comply, the owner must refund the rebate. As a means of enforcement, the state will provide contact information for tenants to notify the state of breaches to this agreement. The state will also include this information in the consumer education campaign, so tenants are aware of their rights under the applicable state law.