



NATIONAL HEADQUARTERS
7 Winthrop Square, Boston, MA 02110
(617) 542-8010

WASHINGTON OFFICE
Spanogle Institute for Consumer Advocacy
1001 Connecticut Avenue, NW, Suite 510
Washington, DC 20036
(202) 452-6252

NCLC.ORG

**Comments of the National Consumer Law Center on the Department of Energy's RFI on
Inflation Reduction Act Home Efficiency & Electrification Programs (DE-FOA-0002981)
March 3, 2023**

1. Respondent Contact Information: Olivia Wein, [National Consumer Law Center](https://www.nclc.org) (NCLC), non-profit, 617-542-8010, owein@nclc.org.

B. Accessible and Equitable Program Design

2. (Best practices to ensure that disadvantaged communities and low-income households are aware of and have easy access to the Home Energy Rebate programs)

NCLC has recommended several best practices to DOE in our [Jan. 18, 2023 letter](#) with the Center for American Progress and the Alliance for a Clean Energy Economy. In addition, we recommend the following best practices:

a) Ensure states have the flexibility to administer the rebate funds through existing networks and programs to avoid duplication between programs. Program outreach should be combined with existing outreach efforts for other energy programs where possible, promoting efficiencies for consumers and program administrators.

b) Create outreach and navigator programs with trusted community partners (similar to the [digital navigator](#) approach to internet access). Allow up to 5% of the state grants to be used for outreach and navigator programs conducted by trusted community-based organizations, non-profit organizations, and local agencies as appropriate. These trusted messengers are key to serving hard to reach populations (to overcome barriers of trust, language, accessibility, and to help braid these rebate opportunities with other assistance programs). It is unreasonable to place the burden on consumers to master the enrollment rules and processes for these different programs. Trained navigators can help eligible consumers package the federal rebates with Weatherization, LIHEAP, utility ratepayer funded energy efficiency and other energy assistance programs, to ensure that members of disadvantaged communities and low-income households are able to enroll in the best combination of assistance available.

c) Establish clear requirements for outreach to owners of multi-family housing and to tenants, whether through state plans or other guidelines to ensure an appropriate percentage of this population is served by the rebate programs. Since [nearly 40% of federal WAP households are tenants](#), this outreach will be important to the success of the program.

d) Provide easily accessible application materials, through paper and telephone application processes in addition to on-line applications.

3. (Re: alignment with the Justice40 Initiative)

Metrics are necessary to evaluate progress toward Justice40 goals. DOE should require state plans to include metrics and data reporting on where the rebate funds are being invested, and the characteristics of household receiving the rebates. The data should include the following:

- Zip code or census tract;
- Whether the participating household is a tenant or a homeowner;
- Whether the property is part of multi-family housing;
- Total dollar amount, number and type of rebate-funded measures;
- Whether the household received enhanced rebates for families earning up to 80% of AMI;
- If possible, additional demographic information including: race/ethnicity; age; language preference; occupant with a disability; income (or receipt of other means-tested benefit), and household participation in other means-tested energy affordability programs.

As described at B.2, DOE should encourage the creation of outreach and navigator programs involving community-based organizations, non-profits and [community anchor institutions](#), with larger set asides for such organizations in [disadvantaged communities](#).

DOE should direct that state plans include funds for translation of applications, instructions, notices, other program related documentation and outreach materials (including radio scripts, social media posts, posters, etc.) into the most common languages in the state, as well as allowing funds to pay for outreach on local media that cater to non-English speakers. Program and outreach materials should also be accessible to consumers with disabilities.

DOE should encourage states to increase the HOMES rebate amount for low- and moderate-income households pursuant to §50121(c)(3) and to combine the eligibility and application process with the state's HEEHR rebate, particularly in areas designated as disadvantaged communities.

4. (Re: meaningful eligible entity stakeholder engagement)

See response to B.2, supra, for stakeholder engagement recommendations. Additional stakeholder engagement should include a range of consumer representation such as consumers with disabilities and their family members, households with elders, households with young children, households with Limited English Proficiency. Service providers such as affordable multi-family property owners, medical-legal partnerships, legal aid organizations, [community anchor institutions](#), faith-based organizations and veterans organizations should be included.

5. (Re: minimizing energy burden and costs, particularly in LMI and high energy burden households)

For rebate programs targeted directly to consumers, program operators and contractors must provide consumers with accurate estimates of the costs of installing and then operating the measures. Installation costs should be transparent, and for low-income customers these costs should be covered by rebates and any other appropriate programs that fully fund the purchase of equipment and installation. We urge the DOE to adopt guidelines that require screening for other means-tested energy assistance programs and to strongly discourage the use of financing, lending, "buy now pay later," rent-to-own, and other forms of consumer debt to finance measures that are not fully paid for with the rebates. Expensive and predatory financing should not be permitted and DOE should require state plans to be explicit in how they will prevent the use of risky financial products in conjunction with the rebates. See consumer protection discussion in response to B.6, infra.

The integration (braiding) of the rebates with other energy affordability programs (such as WAP, utility-sponsored energy efficiency programs, LIHEAP, and state programs) will be critical for lowering the cost of measures and ongoing energy bills for low- and moderate-income consumers. DOE can further assist State Energy Offices (SEOs) by convening regional and state-specific opportunities for program administrators to develop coordination and braiding strategies with other

federal, state and local and utility-based energy affordability programs, and for providing support for program administrators to increase HOMES rebates for LMI households pursuant to §50121(c)(3).

To reduce ongoing energy burdens, the programs should prioritize the adoption of measures that are most likely to reduce household energy expenses, which will vary based on the region, condition of the home, and local energy costs. If a measure might increase energy bills (e.g., an air source heat pump (ASHP) in a house that previously lacked air conditioning), thorough customer education will be necessary. For low-income households who adopt these measures but have an unanticipated higher energy burdens as a result, some funding should be reserved to provide assistance to families facing disconnection of utility service, eviction, or other financial hardships.

Through regulations or FAQ guidance, DOE should also provide program administrators with model [consumer protections](#). For example, rebate measures based on projected savings should include [fail safe measures](#) in case the projected savings fall short and energy bills are higher than promised.

6. (Re: program design to prevent contractor installations that increase energy bills)

DOE should establish model contractor certification guidelines, as described at K.54 and in our [Jan. 18, 2023 letter](#) to DOE. Strong [consumer protections](#) will be needed to limit the possibility that unscrupulous contractors would seek to unfairly profit from the rebate programs. The financing of energy efficiency and renewable energy projects for low-income consumers through door-to-door and telemarketing sales, including sales by contractors offering energy efficiency or renewable energy services, has an unfortunate history of high-pressure tactics, [deception and other systematic consumer abuse](#). Consumers, including low-income households who greatly need the benefits of the IRA rebate programs, should be shielded from these risks.

DOE should prohibit state rebate program designs that tie program administrator or contractor compensation to the volume of transactions in the absence of careful oversight through independent energy audits, assessments, quality control and ongoing savings monitoring. Without such protections, financial risks would fall squarely on the low-income consumer. As an example, the FCC strictly prohibits financial incentives for enrollment in its low-income Affordable Connectivity Program (ACP) as a program integrity measure (see, [ACP Order](#), paragraphs 24-27).

NCLC has highlighted consumer risks from aggressive [and misleading energy sales pitches](#) and has recommended a number of common sense consumer protections which can help low income consumers benefit from the energy-related programs (see e.g., NCLC issue briefs on the [PACE program](#) and [Tariff-based On-Bill-Financing](#) programs).

Essential consumer protections that must be incorporated in all state plans and included in DOE trainings and technical assistance to the states include:

- The requirement that any disclosures and the completed contract should be provided in both paper and electronic formats, particularly for low-income households or households in a disadvantaged community. In the initial marketing of predatory PACE contracts, contractors appeared at homes armed with contracts on tablets, encouraging consumers to sign the contracts with a cursory or no review while promising to later send a copy of the contract by email. Contracts were not readable in their entirety on the tablet. In some instances, the email addresses used did not belong to the homeowner or were not accessible to the homeowner.
- At least three business days to cancel any energy efficiency contracts, particularly if there is any financing. Contractor work should not be allowed to commence until this period expires.

7. (Re: preservation of affordable rent and inclusion of owners of multi-family rental properties)

DOE should provide model contracts and covenants that require affordable multi-family property owners who participate in the DOE Home Efficiency and Electrification Rebate Programs to

continue offering affordable rents for at least 5 years beyond the date of the receipt of the rebate payment. DOE should provide project management services for multi-family property owners to help them braid the different funding sources.

9. (Re: best practices for implementing successful ‘point of sale’ rebates)

See response to B.6, supra, regarding consumer protections from contractor abuses. DOE should ensure that states have the flexibility to integrate the rebate programs with existing networks and programs to maximize leveraging of other funds while minimizing a fragmented and duplicative approach to enrollment into programs by consumers.

DOE must balance the desire for prompt reimbursement to the entity providing the point of sale rebate (contractor, agency, non-profit, etc.) with ensuring consumer protection and sound use of federal funds. DOE should prohibit states from automatically reimbursing contractors for providing consumers with “point of sale” rebates without first certifying that the measures were installed properly and the measures are operating as expected. While the “point of sale” provision can mitigate the barrier posed by a consumer’s lack of up-front discretionary funds, the contracting entity should not receive the full reimbursement for the rebate amount(s) until the work has been completed and checked.

11. (Re: quality control measures)

As noted in the response to B.5 and B.6, it is important that DOE guidelines require strong quality assurance/quality controls that incorporate initial assessments, such as blower-door tests and assessment of needed electrical upgrades in the home.

12. (Re: program components to be implemented separately or together)

To the extent possible, states should be encouraged to use the same eligibility criteria and income verification practices for the consumer rebate programs (e.g., categorical eligibility for low-income consumers enrolled in other means-tested benefits) and provide higher HOMES rebates for LMI households pursuant to §50121(c)(3) using the HEEHR definition for low- or moderate income. See responses to G.37–G.39 regarding best practices for income verification.

D. Designing Programs for Maximum Impact

17. (Re: similar programs)

NCLC is not aware of similar federal rebate programs for specific measures such as ASHPs. However, we can point to a previous instance in which the federal government, under the [American Recovery and Reinvestment Act of 2009](#), offered significant, new weatherization dollar appropriations to states to supplement the federal government’s (DOE and HHS) existing [Weatherization Assistance Program](#) (WAP). In sending money to state offices for the purpose of reinvesting in the economy and energy efficiency in particular, the government recognized the importance of *utilizing existing program structures* to ensure appropriated funds get out the door quickly, and efficiently reach the people for whom the benefits were designed without creating unneeded additional program structures.

A state level example for braiding programs is the Massachusetts [Low Income Energy Assistance Network](#) (LEAN) weatherization program. LEAN is consistently ranked as a model low-income weatherization program that combines significant (ratepayer-funded) utility program dollars with federal weatherization program budgets to maximize efficiencies and customer engagement.

In the area of housing, the U.S. Department of the Treasury is currently implementing the [Homeowner Assistance Fund](#) (HAF) program of the American Rescue Plan. Funding flows through the states, territories and tribes and then is used for foreclosure avoidance. As with the WAP program, the

HAF program uses existing structures through state housing finance agencies to process eligibility and awards. To date, the funds distributed have surpassed targets for percentages intended to reach disadvantaged populations. States maintain data dashboards with program updates and Treasury collects and reports both quarterly and annual data on a reasonably granular level.

18. (Re: measuring success)

Possible metrics to measure success include: achievement of Justice40 goals; numbers of low-income consumers who received enhanced rebates; consumer satisfaction with installed measures; reductions in home energy burdens; improvements in home health and safety conditions (e.g., indoor air quality); corollary benefits of program participation such as new enrollments in LIHEAP; rate of consumer complaints about contractor practices or performance of installed measures; and preservation of affordable housing after the efficiency and electrification measures are installed.

19. (Re: data collection for the purposes of evaluation)

b. (Re: specific data is needed to evaluate program success)

See D.18. As discussed in response to D.17, in the housing context Treasury is implementing significant data collections and public reporting in connection with the [Homeowner Assistance Fund](#) program. This data collection was preceded by needs assessments by each jurisdiction to identify the target populations and relative size of socially disadvantaged groups. In order to evaluate program success, the data look both at who is getting the assistance and how those households will benefit over time. Similarly, the FCC's Affordable Connectivity Program has an [enrollment and claims tracker](#). The tracker is updated weekly and contains data at the zip code and county level, in addition to statewide and national data. Local governments and community-based organizations use this information to target outreach and measure impact. In the case of the DOE rebates, it will be essential to include granular enough information to understand the demographics of populations receiving rebates. Aggregate data should be available to the public.

21. (Re: practices and/or policies drive higher energy savings per rebate dollar invested)

Leveraging the available rebates with existing WAP and utility-sponsored energy efficiency programs is critical given those programs' existing protocols for ensuring measures are installed correctly, accompanied by needed health and safety upgrades, and installed in the right order to maximize efficiency in the structure. As noted throughout our comments, the existing quality assurance/quality control requirements of these weatherization programs will ensure the DOE investments are cost-effectively and efficiently utilized. The importance of pre- and post-installation efficiency assessments of a building cannot be understated to ensure that, for instance, an ASHP was sized correctly for the home and that maximum efficiency is achieved.

22. (Re: use of set-asides)

DOE should encourage states to roll out the rebate program in stages so that disadvantaged populations can access the funds at the front end. Directing enhanced resources to and partnering with trusted community-based groups to get the word out and help bridge communications with contractors may also increase participation. See responses to B.2 and B.4.

23. (Re: best practices to reduce implementation costs or to maximize the reach of program funding)

As noted throughout these comments, DOE should ensure that the rebates are coordinated with available WAP and utility-sponsored energy efficiency programs, as these programs often utilize bulk purchasing and other economies of scale to ensure program cost-effectiveness.

24. (Re: practices to maximize uptake)

Existing WAP and utility-sponsored programs typically include interim and annual uptake/buildings treated targets to measure program success. These existing target goals can be adjusted to reflect new IRA rebate opportunities, highlighting the economies of scale and efficiencies that naturally occur when the IRA rebates are leveraged with existing programs.

25. (Re: ensuring effective consumer education and outreach)

Please see B.2 and B.4. NCLC has recommended several best practices to the DOE in our [Jan. 18, 2023 letter](#). While consumer education and outreach are essential, and should include engagement from community organizations, these mechanisms do not preclude the need for strong consumer protections to ensure participants are provided with affordable and sustainable solutions.

E. Integrating Existing Incentives & Programs

28. (Re: building on and coordinating these funds with existing networks and programs)

a. What guidance is needed from DOE to make this successful?

DOE should issue clear guidance to maximize resources available to consumers, particularly low-income consumers, by leveraging funds from WAP, state programs, and utility-sponsored energy efficiency and electrification programs. DOE should clarify that funds from different sources may be used within the same home (e.g., home electrification rebates for an induction stove and ASHP could co-exist with other work to insulate the home that is funded by WAP) and should provide examples of permissible and impermissible uses of rebates and other program funds.

Guidance from DOE may be needed to highlight differences between households and the types of programs they may receive. For instance, the important low-income adder increases rebates for households with incomes up to 80% AMI. Some of those households (e.g., those below 60% of AMI) may be eligible for federally funded WAP and LIHEAP support. Households with income between 60-80% of AMI may have access to fewer means-tested benefit programs, although their financial need may be nearly as great. These differences could be explained in guidance, with recommendations about the resources available to households at different income tiers.

b. (Re leveraging other resources and/or provide seamless services)

See Response to E.28(a). Also, we urge DOE to consider the recommendation of the National Association of State Energy Offices (NASEO) in its [January 23, 2023](#) letter to Secretary Granholm urging close collaboration through the existing NASEO Residential Energy Efficiency and Beneficial Electrification Task Force. We encourage DOE's participation in this task force.

c. (Re: What concerns and risks)

As noted, leveraging WAP and existing utility-sponsored energy efficiency programs will be critical to address the needs of low-income consumers, and to reduce or eliminate the need to take on consumer debt to pay for electrification and efficiency improvements. If significant gaps in funding require consumers to finance parts of these improvements, there would be an increased risk that unscrupulous vendors or contractors could deceive or defraud potential program participants by marketing a "free" program but signing up consumers for unaffordable financing products.

DOE should consider staggered release of funding to the states, with the filing of individual state plans describing how leveraging will work and what additional consumer protections have been created to ensure potential program participants are not victims of fraud as a prerequisite to receipt of additional IRA rebate funding.

29. (Re: potential barriers to effective program energy savings attribution)

It is essential that projected energy savings be viewed as exactly that—a projection. Consumers must be clearly informed that these are estimates and that actual experiences may or may not match those expectations. To ensure the customer has an understanding of the energy savings changes (either positive or negative) that will occur upon installation of the rebated measures, careful assessment of a customer’s usage behavior through an assessment of the customer’s typical monthly energy usage (both electric and heat source), with seasonality incorporated in the assessment, is critical. This assessment will both educate the customer regarding the measure opportunity’s impact on their energy usage and provide needed data for the program.

30. (Re: to ensure that low-income households are optimally served)

See responses to B.6 through D.17.

31. (Re: rebates supplement and not supplant existing assistance programs)

See B.5, B.9, D.17, D.21, D.23 re: the importance of leveraging other programs.

F. Opt-In Tools, Resources, Technical Assistance, and Partnerships

32. (Re: tools and resources to implement programs)

DOE should provide funding to the states for translation services for materials explaining the rebates, program rules, instructions for finding certified contractor, application forms and instructions for completing the applications, and complaint instructions. See responses to G.38 and L.54 for recommendations for tools to help with various aspects of program implementation.

I. Income Verification

37. (Re: types of documentation should be considered)

a. What are common barriers to effective income verification for LMI households and what industry practices are less effective or should be avoided?

For many means-tested benefits, documentation requirements are a common barrier to program enrollment. Low-income households, older consumers and others may lack internet access, computer skills, access to a computer, or even lack of a printer and postage. Additionally, low-income households may need to apply to many different programs, which can be time consuming and confusing. Consumers may need to spend additional time correcting incomplete information or appealing decisions. If time away from work is required for in-person applications, that would create a further barrier.

Categorical eligibility (where participation in other means-tested programs automatically confers eligibility for rebates) is a best practice. It saves time and streamlines the eligibility determination. The FCC’s Lifeline and Affordable Connectivity Programs provide consumers with several avenues to demonstrate program eligibility including automated determinations through [computer matching agreements](#) with qualifying programs as well as submission of [documentation](#) of income or participation in qualifying programs. The FCC’s Lifeline and ACP computer matching agreements provide a “yes/no” check on whether an applicant is participating in the qualifying program.

Exchanging minimal consumer data is a best practice. Income verification involves highly sensitive personal information so access must be limited to parties with information security measures in place. The state rebate program designs should not introduce risk of identity theft, misuse of data (e.g., sharing or selling of eligible households or consumer information to target sales pitches for

unauthorized services or products), or other unauthorized uses of personal data. DOE should prohibit states from providing contractors or commercial entities with sensitive personal consumer information, particularly for low-income households participating assistance programs.

Instead, income verification should be handled centrally through a designated state agency or non-profit organization that administers low-income assistance programs and already has privacy protections in place. States can verify eligibility by entering into data sharing agreements with means tested programs. See G.38 for a discussion of helpful tools.

Since even lists of eligible households can be abused by unscrupulous actors seeking to target low-income households, DOE should clearly prohibit any entity with sensitive consumer information from sharing this information with unauthorized parties. DOE should require state plans to certify steps to protect customer information and the procedures in case of data breaches.

d. Some programs determine income eligibility by address, such as if 80 percent of more of the census tract has a certain income. What are the benefits and drawbacks of this approach?

While determining income eligibility through data analysis would be easier to administer and audit, such efforts should be combined with other screens to identify low-income households that might otherwise be missed.

e. (Re: prevention of duplicative document or verification requirements)

DOE should encourage states to use existing networks and programs and use a common application or deem participation in other programs as automatically qualifying a household without need for further proof of eligibility (categorical eligibility). See the response to G.38 for helpful tools.

38. (Re: a national income qualification system)

Tools: States should be encouraged to streamline eligibility determinations through computer matching agreements to allow for a more automated “yes/no” check to see if a consumer is participating in one of the qualifying means-tested programs (e.g., LIHEAP). We encourage DOE to work with the [US Digital Service](#) and confer with the FCC about the [National Eligibility Verifier](#) used for eligibility determinations for the federal Lifeline and ACP programs. The FCC’s Lifeline and ACP National Eligibility Verifier has entered into computer matching agreements with CMS for Medicaid participation, HUD for public housing assistance, the Veterans Administration for low-income pension program, and SNAP databases in 25 states and territories. The USDA’s Supplemental Nutrition Assistance Program (SNAP) is also building a [National Accuracy Clearinghouse](#) which will be a database with all current SNAP recipients. If DOE builds a similar national eligibility database, DOE should also create a [Representative Accountability Database](#) (RAD) to ensure those agents helping customers enroll in the rebate program have been vetted as they will have access to sensitive personal information. This tool takes time and resources to build and not all eligible households will be found in these databases as the income eligibility for the rebates is much higher than the eligibility for these other federal benefits programs, however, the households participating in these federal means tested programs are among the most cash constrained and vulnerable of the eligible population and [streamlining their eligibility determinations](#) will remove a barrier to participation.

To the extent possible, DOE can facilitate access to LIHEAP and WAP participants and publish a list of HUD and USDA buildings that are eligible for the rebates similar to those prepared for [WAP](#). Access to the national rebate qualification system should not be available to contractors or for-profit entities, but should be limited to non-profit or government entities authorized to process eligibility for the rebates.

39. (Re: successful approaches for determining income qualification)

See responses to Questions G.37 and G.38, supra.

c. (Re: eligibility criteria for categorical eligibility)

Participation in LIHEAP, WAP, low-income utility assistance programs, SNAP, WIC, Medicaid, various HUD housing assistance; Veterans Affairs and Survivors pension programs, SSI, Temporary Assistance for Needy Families; Head Start; school lunch programs; Bureau of Indian Affairs General Assistance, Tribal Head Start, Tribal Temporary Assistance for Needy Families, Food Distribution Program on Indian Reservations, state-specific means tested assistance programs (this list is not exhaustive).

H. Estimating and Measuring Energy Savings

40. (Re: support for program implementers)

To support program implementers incorporating energy savings in IRA programs, DOE should require implementers to use proven modeling software and incorporate the energy savings benefits that come from required infrastructure upgrades. Program implementers should be required to work with software engineers to further detail impacts using whole house building science-based savings into the measured energy efficiency calculations. We know that a rebated ASHP will run more efficiently when the home itself is weatherized and can maintain the conditioned air effectively. Many, if not most heat pump upgrades will require necessary service and electrical panel upgrades and even wiring systems replacements in most homes built in the mid-20th century and earlier.

42. (Re: calculating energy savings and associated impacts)

The DOE recently adopted a [methodology](#) of calculating non-energy benefits in the federal WAP tool kit for program administrators to utilize in their modeling software in order to include non-energy benefits in the energy audit process. This methodology incorporates greenhouse gas emissions valuations, fuel switching impacts and water usage reduction impacts.

45. (Re: calculating savings based)

See response to H.42.

K. Compliance and Quality Assurance

51. (Re: tracking participation in rebate programs for compliance and QA)

To protect against abuses by contractors including work not done, done improperly or with ineligible products, programs can establish reserve funds to compensate homeowners and staff and procedures for addressing these problems. State energy offices should ensure that contractors involved in implementing the program are certified either through state public utility commission certification or through weatherization and utility energy efficiency program certification processes. Regular audits and exclusion of contractors with repeat abuses also would contribute to compliance. DOE should partner with [USDS](#) to develop a registry tool, as described at L.54.

52. (Re: QA/QC)

Quality assurance and quality control (QA/QC) is a critical component of any legitimate energy efficiency program offering. Ensuring quality and cost-effectiveness begins with an initial assessment of the home or building that will be upgraded with measures and follow-up assessment after the installation of measures to ensure that forecasted energy savings can be expected to occur. DOE should look to the WAP QA/QC guidelines for model recommendations for IRA program measures.

53. (Re: data should DOE and program administrators collect)

NCLC recommends that DOE administrators consult with WAP data collection guidelines for model and cost-effective QA/QC control.

L. Job Creation & Quality

54. (Re: contractor and/or laborer credentials and/or certifications)

We recommend that DOE adopt rules that have been successfully used in the WAP program as appropriate (e.g., contractor and laborer qualification requirements, including contractor disqualification, contractor licensing, claw back provisions and strong QA/QC and auditing requirements).

DOE should establish model contractor certification guidelines. Without strong oversight, low-income households may be disproportionately vulnerable to contractor abuse, fraud, or misconduct.

Certification should include an agreement by each contractor that they will refrain from unreasonably marking up the price of any home efficiency or electrification product or installation; adhere to strong data privacy protections for consumer information, and commit to complying with consumer protection laws in their states (e.g., door-to-door sales, and applicability of state consumer fraud statute)

DOE must provide strong and accessible contractor training programs. In addition to the topics addressed above, trainings should: 1) Address how contractors should partner with registered apprenticeship programs, electrification specific licensing programs, and certifications; 2) Connect contractors with unions, public workforce development system partners, and community-based organizations for the purpose of hiring diverse, local talent; 3) Promote a workplace free from discrimination and harassment; 4) Address how to comply with relevant federal and state employment laws and policies; and 5) Ensure accommodation for customers and workers with Limited English Proficiency (LEP) or disability.

DOE should work closely with the [US Digital Services](#) to develop the following **tools** for state programs:

(1) A **consumer-friendly database of certified contractors**, providing information that consumers can use to shop for estimates. This database should be updated frequently to add certified contractors and quickly remove or put a hold on contractors that have a pending removal request. States should be encouraged to cross check for contractors that have been removed from neighboring states. There should be a field for aliases used by the contractor and other means to identify contractors that use deceptive practices. The tool could include cross references or links to related complaint databases such as the Better Business Bureau.

(2) A **portal** to track use of the HOMES and HEEHR rebates along with other federal, state/local/utility-based energy assistance and tax credits, to assist with the braiding of resources and to ensure that there is no prohibited combination of federal grants or rebates for measures.

Coordination between the DOE, state energy offices, state attorney general offices, and organizations that work with low-income consumers to address home energy needs will facilitate timely updating of guidance to address emerging issues.

55. (Re: practices are needed to ensure quality installations)

See response to K.52.