

# Arizona HEAR Program DOE IRA Required Application Plans

## 50122 Consumer Protection Plan

Arizona's Consumer Protection Plan describes the processes and procedures to achieve the highest quality customer experience through Arizona's Home Energy Rebates Program. Arizona has developed a thoughtful and comprehensive plan grounded in industry best practices and DOE requirements. This plan includes the following components:

- Mechanism to Solicit Consumer Feedback
- Resolution Procedures
- Data Review for Completed Projects
- On-site Inspection Standard Procedures & Documentation
- Contractor/distributors/retailers Eligibility & Pre-qualification Requirements
- Installation Quality Assurance & Closeout
- Processes & Mechanisms for Continuous Process Improvement

The plan will be available to the public on the program website in addition to the Arizona Governor's Office of Resiliency (OOR) official state government website<sup>1</sup>. Paper copies will also be made available upon request. The plan will be reviewed annually and incorporate revisions identified in the described continuous improvement process. These revisions will be communicated to program staff and service providers.

In this plan, we describe the activities that the Arizona Home Energy Rebates Program will undertake to protect consumers. We further define the roles and processes of OOR and the program implementer (the RI Team) to provide robust transparency regarding Arizona's Home Energy Rebates Program that will empower consumers with opportunities to protect themselves.

As part of the implementation of this plan, the program will apply and execute agreements with participating retailers, contractors and/or distributors. These agreements will

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<sup>1</sup><https://resilient.az.gov/>

establish that they agree to comply with the program's Quality Assurance and Quality Control requirements and establish their roles and responsibilities.

## Consumer Feedback

The Arizona Home Energy Rebates programs will connect consumer feedback, resolution procedures, and continuous feedback to establish a holistic approach to serving individual participants and ensuring effective program delivery Arizona residents, homeowners, and building owners.

Consumer feedback channels will be available throughout the program participation process and culminate with a post-project survey. An assigned case manager for each application will be central to ensuring participant satisfaction and obtaining feedback while projects are in progress. The case manager will be supported by the program's resolution coordinators, the program's Continuous Improvement Team, and OOR staff. Upon completion of projects, the responsibility of processing and responding to feedback shifts to the Continuous Improvement Team. The Continuous Improvement Team will be a dedicated internal evaluation group tasked with reviewing program performance and identifying continuous improvement opportunities in near real-time. The Continuous Improvement Team will be made up of RI Team Quality Assurance and Evaluation staff as well as the OOR staff.

## Approach and Metrics

The OOR and the RI Team will establish metrics by which the Arizona program will assess participant-facing performance. These metrics will be a blend of DOE consumer bill of rights and internal expectations, such as:

- a) Listening to participants' needs;
- b) Being responsive to participants' needs;
- c) Answering questions clearly and promptly;
- d) Improving participants' homes;
- e) Providing value to participants; and
- f) Creating a positive experience so participants will want to share their experience with others.

## Transparency and Openness to Feedback

Case managers will communicate Arizona's program quality standards to the participant during the enrollment process and invite participants to provide feedback to the case manager at any time. Program procedures will provide some latitude to the case managers

on the communication of the details, but sharing our expectations and inviting feedback will be part of the documented enrollment process.

In addition, customer enrollment processes will provide participants with a call-in number and email for complaints or concerns that the case manager cannot or is not addressing. These complaints and concerns will reach the program's independent Continuous Improvement Team, whose procedures for escalation will include providing a referral to OOR's assigned program manager(s).

For cases of multifamily buildings where the tenants are not the direct program participants, the program's call center number and email, along with information about the project and the program, will be posted in the building during the project implementation and within any tenant notices regarding the project. Call center staff will be trained to take feedback and transfer calls to the assigned case manager, as appropriate.

## Mid-Project Feedback

As part of the case management process, case managers will be asked to inquire about the participant's experience throughout the course of a project to (1) monitor project progress and participant satisfaction and (2) clearly and consistently communicate to participants that their satisfaction with the process matters to program staff.

The system of record will include structured fields in which case managers will record informal feedback as to whether the participant's program experience is meeting expectations, exceeding those expectations, or falling short, along with a description of any additional feedback provided. Internal procedures will direct case managers on responding to negative participant reports depending on whether the feedback was received from informal check-ins by case managers (e.g., weekly) or by direct participant contact to address an issue. Those procedures will include guidance for case managers to explore what is not going well and to resolve issues within the program team's control. The case management team will include one designated specialist for addressing complex issues requiring escalation. The Continuous Improvement Team will review mid-project feedback recorded in the system on a monthly basis and summarize those results for the program team on a regular basis.

To facilitate high-quality, positive program performance and to adjust processes in a timely manner, the case management team will meet on a weekly basis to report and discuss recent participant feedback. Case management leads will provide a monthly summary of feedback discussions to the program management Continuous Improvement teams to facilitate consumer feedback into the program's continuous improvement cycle.

As noted, a program-related telephone number and email will be available to participants. These communication pathways will lead to the program call center, which is supported by the case managers. Call center staff will refer non-routine questions to the case managers assigned to any given project. If a participant expresses concerns about the case manager's handling of the issue, the call center will route the call to the Continuous Improvement Team for resolution. Concerns requiring further escalation by either the case manager or the Continuous Improvement Team will be directed to OOR.

## Post-Project Survey

The Continuous Improvement Team will develop and host a post-project survey that asks participants about each of the six internal customer-facing metrics, summarizes results weekly, routes any issues of concern to the appropriate case manager, and reports on-going statistics to the program management team and OOR monthly as part of regular reporting. The program website will also include periodic updates on participant satisfaction.

The survey will be primarily web-based with a telephone option available for participants who would like to dial in or request a call instead. A request for participants to complete the survey will be sent from the case manager three to six months after project close-out.

The survey will also include the following DOE-required questions (using a five point disagree to agree scale with a not applicable option):

- It was easy to understand the rebate requirements and provide the needed information
- It was easy to find a contractor/distributor/retailer
- The contractor/distributor/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 Arizona Energy Saver 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

Our consumer protection processes include multiple built-in steps designed to ensure quality service and reduce the likelihood of unresolved conflicts. In addition to these preventative measures, we note:

- The Arizona Home Energy Rebate programs' qualified contractor/distributor/retailer network will screen and prequalify contractors/distributors/retailers with the appropriate licensing, insurance, certifications, customer service and performance backgrounds.
- The program will ensure energy assessors possess certifications in BPI standards and customer service training.
- To drive transparency (and participation), prior to any work being agreed upon, the RI Team's energy assessor will review with the applicant their options for energy efficient measures as well as the results of the energy assessment and energy modeling.
- For work that is not possible to inspect after completion due to closure of walls, construction observation and photo documentation will be included prior to the completion of the work.

To empower consumers and contractors/distributors/retailers, the appropriate contacts for any concerns will be clearly communicated in program information, on-boarding material for contractors/distributors/retailers, and participation agreements. Similarly, the ability to escalate a concern will be specified as well.

At the same time, contracts, and participation agreements between and among parties (the Arizona Home Energy Rebate program, contractors, retailers and distributors) will be written to clearly spell out legal obligations and commitments.

## Participant –Resolution Procedures

Quality assurance practices described elsewhere in this blueprint plan will address standard technical and related issues that can occasionally occur in home improvement work, such as equipment and installation issues. Contractors/distributors/retailers will be expected to remedy any issues identified by the quality assurance process or brought to the program's attention by participants. To facilitate this process, we will build the following responsibilities and processes into our program teams:

- The implementation team and contractor/distributor/retailer overseeing installations will each have an appointed issue resolution coordinator on the team.

- If participants contact their case manager with unresolved concerns with the equipment or installation, the case manager will document the issue in the program records and refer the situation to the contractor/distributor/retailer-facing resolution coordinators, who will attempt to resolve the issue or escalate it to team’s appointed senior issue resolution coordinator.
- Issue resolution coordinators will seek to resolve the situation. In cases involving participants and contractors/distributors/retailers, the resolution coordinator and the case manager will communicate and work together. Any conflicts the coordinators and case managers cannot resolve to the satisfaction of all parties involved will escalate to an applicable RI Team’s workstream manager or owner.
- Participants and contractors/distributors/retailers will always have the option to escalate situations that are not resolved to their satisfaction to the next level.
- Any allegations of fraud will be escalated to OOR immediately. In these cases, the program team will document all available information and, if needed, refer the case to the Arizona Office of Attorney General.
- Upon participant or contractor/distributor/retailer request—or if the workstream owner is unable to resolve an issue—the situation will be brought to the attention of an ombudsman appointed within OOR.

To provide transparency to OOR and the DOE, all concerns that are brought to the attention of the case management team will be recorded in the applicable project files with details on the nature of the concern, who was involved, dates, pictures, or other documentation, attempts to resolve the situation, and any latest status or next step. Summary statistics on concerns or complaints made, their nature, and the stage at which they were resolved will be provided to OOR in regular program updates. This data will be available to DOE on request, will be elevated for appropriate discussion in quarterly meetings between OOR and DOE, and included in appropriate reporting requirements.

Furthermore, OOR and the RI Team will maintain the following procedures for select issues and concerns:

**Contracts:** Contracts associated with Arizona’s HEAR program will not contain mandatory arbitration clauses. OOR will ensure the inclusion of the holder-in-due course rule included in contracts associated with the HEAR program, so consumer protections are not lost if the contract is assigned to a third-party creditor.

**Allegations of Fraud:** OOR will establish a referral process for fraud allegations against any program participant, be it a contractor, customer, distributor, retailer, or any other participant. This process will include an anonymous hotline to report potential waste, fraud, and abuse. The process will involve referrals to the Arizona Office of Attorney

General for further investigation, follow-up, and potential criminal and/or civil investigation. OOR and the RI Team will follow the investigation and make internal determinations about possible program action, including removal of participants or contractors/distributors/retailers from the program depending on the severity of the issue, as well as past performance and the frequency of any issues of concern when the complaint or allegation is made against a contractor/distributor/retailer. Details of any referral and investigation will be maintained for use in the future as needed.

## Remediation Procedures

The following sections describe quality control and quality assurance processes and practices that will identify, communicate, and correct deficiencies associated with the program applications, data collection, energy savings analyses, and the installation of measures.

As mentioned above, each application is assigned a case manager that will follow the project through completion and serve as the participant's initial point of contact to the program. During the application and assessment processes, prior to the commencement of work in the home, the case manager will be responsible for correcting identified deficiencies and ensuring adherence to program eligibility requirements. During the installation phase of the project, this responsibility shifts to qualified contractors/distributors/retailers. The case manager will continue to interface with the applicant and also qualified contractors/distributors/retailers during this installation phase to ensure the installation is completed and issues resolved.

Quality control and quantity assurance (QA/QC) staff will review all applications at multiple phases of the project. All quality deficiencies discovered by program staff and QA/QC staff will be communicated to the appropriate case managers who will implement corrective actions. Applications with these quality deficiencies will not be allowed to proceed to the next stage in the process until all issues are resolved. Similar to the consumer feedback resolution process described above, quality assurance deficiencies involving the installation of equipment will be addressed with the case managers and the contractor/distributor/retailer resolution coordinators.

## Data Review

We have established the following comprehensive processes Quality Assurance/Quality Control (QA/QC) Specialists will follow to conduct the required applicant and project data/file reviews, ensuring accurate application processing and rebate payments in strict compliance with program rules. A description of the training or credentials of the Quality

Assurance/Quality Control (QA/QC) Specialists conducting the data/file review is provided in the Training and Credentials of Quality Assurance / Quality Control Staff section of this document. Our system of record software includes built-in data validation to confirm compliance and identify incomplete applications. Additionally, a stratified review matrix is utilized, applying additional reviews based on the rebate amount to maintain the highest standards of accuracy and integrity.

## Quality Assurance Checks

Quality assurance for projects with smaller rebates will rely more on the automated validation controls, while larger projects will involve additional manual reviews. Business procedures will be in place to investigate data exceptions and train the review staff on timely resolution and documentation. The RI Team will randomly select a statistically significant number of applications and home assessments to review on a quarterly basis.

## Regular Audits and Data Control Updates

To maintain data integrity, we will regularly audit our data review validation controls. Range limits, logical correlations, and format consistency are reviewed and updated to ensure alignment with evolving DOE guidelines and energy management standards. Additionally, OOR will conduct data audits on a statistically significant sample of projects to monitor and ensure all required data is captured accurately.

## Ensuring Data Quality in Home Assessments and Estimated Savings

The home assessment plays a pivotal role in consumer protection in the Home Electrification and Appliance Rebate (HEAR) program by providing homeowners with the insights needed to make informed decisions about their energy upgrade projects. By observing and documenting the pre-existing conditions of a home, the assessment enables homeowners to better understand the potential risks and benefits associated with energy upgrades, ensuring the improvements deliver tangible utility bill savings while adhering to safety and effectiveness standards. Furthermore, thorough assessments protect taxpayer funds by preventing unallowable expenditures.

A limited home assessment is required for each HEAR program rebate including an electric heat pump utilized for space heating and cooling. Our assessor collects key data such as unique home identifiers (e.g., address), dwelling type, fuel source, existing energy equipment and systems to be replaced. The data collection process will follow standardized data specifications and guidelines within the IRA Home Energy Rebates: Data and Tool Requirements Guide for homes<sup>Error! Bookmark not defined.</sup>. Our data validation process is designed to ensure the integrity of data entered into our home assessment tools.



During data collection, our assessor will identify qualified electrification projects (QEP), document existing equipment to be replaced and new equipment proposed for installation and will provide an estimated total project cost. The data is analyzed and undergoes a review process to determine if the project meets acceptable utility bill increase risk levels. In the case of fuel switching measures, we will collect a detailed estimation of the long-term bill impacts for participants. If a project is flagged as an unacceptable risk for increasing the utility bill, an estimate of the bill impacts and written acknowledgment by the customer will be completed and retained.

Each home assessment provides a comprehensive view of the household's energy use, the project's estimated post-retrofit energy consumption, and savings attributable to the upgrades.

By adhering to this rigorous data collection and assessment process, we ensure compliance with program requirements, provide accurate savings and utility bill impacts, and protect consumers. This guarantees that energy upgrade projects are both safe and effective, delivering real utility bill savings for households and building owners pursuing energy efficiency improvements.

## Low-Income Rebate Alignment

For low-income rebates, we ensure the rebate amount aligns with the verified income category. This is achieved by:

- Reviewing all supporting income documentation submitted with the application:
  - Single Family Dwellings or at least 50% of multifamily buildings dwelling:
    - Documentation of household income (e.g., 1040)
    - Documentation of enrollment in a pre-qualifying program
  - One of the following categories applies to at least 50% of multifamily dwelling:
    - Public Housing (housing owned and operated by Public Housing Authorities)
    - Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)
    - Privately-owned multifamily buildings that house residents receiving tenant-based assistance
    - Section 42 Low Income Housing Tax Credit (LIHTC)
- Verifying the documented proof of income by requesting updated income data from source systems and qualifying programs.
- Applying program-specific guidelines to determine eligibility and rebate levels.

To assure and document quality control, the state will outline business procedures to address data exceptions and train the appropriate staff for timely resolution and documentation. In the event there is an anomaly, discrepancy or exception in the data that is inconsistent with the claimed income level and/or indicates potential fraud, waste, or abuse, the state will follow Remediate Procedures described above to investigate, remedy and rectify instances of failed income verification. Rebate amounts will be adjusted based on the verified income prior to the application advancing to the next stage.

We will record consumer acknowledgments regarding the project's impact on energy costs, estimated annual energy savings, and if applicable, the costs to the homeowner beyond available rebates and incentives. Transparency in communicating these impacts is crucial to ensure participants are fully informed about the financial implications of their choices.

For all tenant-occupied properties that receive higher rebate amounts available only to households with incomes less than 80% AMI, the state will require the building owner to sign a statement acknowledging the following:

- They are the owner/authorized agent for the property,
- That said property is not currently for sale,
- The owner/authorized agent agrees to rent the dwelling unit to a low-income tenant.
- The owner/authorized agent agrees not to evict a tenant to obtain higher rent tenants based upon the improvements.
- The owner/authorized agent 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/authorized agent agrees that if the property is sold within two (2) years of receipt of the rebates, the aforementioned conditions apply to the new owner and must be part of the purchase agreement.
- In the event the owner/authorized agent does not comply with these conditions, the owner must refund the rebate amount received from the Home Energy Rebate Program.
- The owner/authorized agent will provide written notice to tenants explaining their rights and the building owner's obligations (e.g., add an addendum to the lease).

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.

## Scope of Work and Documentation Requirements

Our assessment and quality assurance processes are carefully designed to align with program requirements and protect consumer interests. The following points outline the rigorous steps we take to ensure compliance and deliver high-quality results.

### Scope of Work and Installation Address Verification

1. Consistent Scope of Work:
  - a. The scope of work is specified in strict accordance with program requirements, ensuring that each project meets the standards for energy efficiency and safety improvements. The scope of work is developed using the DOE-approved energy modeling software to ensure the list of measures to be installed meet the program requirements for HEAR.
  - b. Using detailed data collection workflow, we develop and outline the project's specific recommendations and associated pricing, ensuring transparency and compliance.
2. Post Installation Address Verification:
  - a. The address of the installation is verified to match the address on the rebate coupon. The preferred method of verification will be through geo-locational data. When geo-locational data is unavailable, additional proof will be required through documentation, which could include utility bills. A signed and dated invoice or installation confirmation document is required from the contractor/distributor/retailer as an acknowledgement that installation was performed at the address.
  - b. By cross-referencing customer data within the auditing tool, we can confirm the rebate application aligns with the homeowner's details to prevent discrepancies.

### Rebate Reservation Approval Review Process

After the assessment is completed and the scope of work is reviewed and approved by the participant, applications are prepared for rebate reservations and undergo a comprehensive programmatic review.

### Final Documents Approval Review Process

This process involves a thorough review of all project documents to ensure accuracy and completeness before final approval. We cross-reference data with the initial rebate

reservation review template to ensure consistency and accuracy. We ensure project costs match the original contract, or any updated change orders, and equipment efficiencies align with equipment standards. The approval checklist verifies document completeness, and any missing information results in submitting direct feedback to the contractor. Approved documents are created and distributed to participants and contractors/distributors/retailers to finalize the review process.

## Post Installation Certificate

Each household is provided with a project certificate, which:

- Details the work performed, equipment and materials installed, and projected energy savings.
- Serves as a record of quality monitoring and accurate valuation of the installed upgrades.

Consumer receipt will be confirmed through email confirmation, home/building owner signature, and/or photographic proof of the certificate displayed in the building it was issued to.

## Data Retention Requirements for Program Implementers

To maintain comprehensive documentation of each project, we have established the following data retention protocols, which will follow state and federal retention schedules:

1. Installation Photos:
  - a. Post-installation photos of major upgrades are retained for all homes. Including rebated appliances and the associated Energy Guide label.
  - b. Pre-installation photos for all qualified electrification projects, which must include the existing equipment to be replaced.
  - c. These images serve as visual proof of completed upgrades and alignment with the contracted scope of work.
  - d. Verification will be accessed through meta data to confirm the location, date, and accuracy of the image.
2. Combustion Safety Testing Proof:
  - a. Testing sign-off by the contractor/distributor/retailer assures fossil fuel equipment meets the performance requirements.
  - b. Proof of combustion safety testing is collected for all homes where fossil fuel appliances have been impacted by the installation.
    - i. Testing includes BPI Combustion safety verification on boilers, furnaces, water heaters and unvented gas appliances.
3. HVAC Commissioning Testing Proof:

- a. Proof of commissioning testing is collected for all homes where HVAC systems are installed. Documented proof of testing and results must be signed by the homeowner or building owner as required by the program.
  - i. Commissioning testing ensures the systems operate efficiently and meet the intended performance standards.
- b. Continued investigation of commissioning tools for process improvement.

## Quality Assurance Inspection Records

Our quality assurance inspection records include the following details and are retained in accordance with state and federal retention schedules:

1. Sampling Rates: The sampling rates for QC inspections are maintained to verify the proportion of projects assessed for quality.
2. Findings and Corrective Actions:
  - a. Each sampled project's inspection findings and corrective actions are documented. As required for newly onboarded contractors, inspection findings are reported to the contractor/distributor/retailer within 30 days for each of the first five projects.
    - i. Reporting initial inspection findings for new contractors/distributors/retailers ensures transparency and continuous improvement in program delivery.
3. Conformance Verification:
  - a. Each project undergoes a verification process to confirm conformance with requirements.
    - i. The verification process includes follow-up inspections, where necessary, to ensure corrective actions have been implemented effectively.

By adhering to these structured processes, we ensure our program delivers consistent, high-quality energy efficiency upgrades while meeting program requirements.

## Training and Credentials of Quality Assurance / Quality Control Staff

### Personnel Qualifications and Responsibilities

RI Team professionals who have comprehensive training and industry credentials will conduct the program implementation and quality assurance processes. These personnel are responsible for ensuring all data aligns with program requirements and maintaining the highest standards of quality assurance.

## Quality Assurance/Quality Control (QA/QC) Specialists

- Qualifications:
  - Bachelor's degree in engineering, Energy Management, or a related field.
- Responsibilities:
  - Conduct detailed reviews of energy upgrade project data and documentation.
  - Verify post-installation photos, combustion safety testing results, and HVAC commissioning testing documentation.
  - Review project certificates for accuracy and completeness, ensuring compliance with Section 3.2.6<sup>2</sup> guidelines.

## Home Assessors

- Qualifications:
  - Certified Energy Auditor (CEA) or BPI Building Analyst Professional (BA-P).
- Responsibilities:
  - Lead the assessment process, ensuring that all collected data is accurate and complete.
  - Review contracted scopes of work for consistency with program guidelines.
  - Cross-check installation addresses with rebate coupons to prevent discrepancies.
  - Monitor the alignment of low-income rebates with verified income categories.

## Senior Energy Analysts

- Qualifications:
  - Bachelor's degree in engineering or Sustainability.
  - Extensive experience in energy modeling and building performance analysis.
- Responsibilities:
  - Provide technical oversight for complex energy upgrade projects (ex. multifamily ASHRAE audit report reviews).
  - Analyze and verify the accuracy of energy savings calculations in modeling software.
  - Conduct QA inspections, identifying findings and corrective actions.
  - Ensure final conformance verification for projects requiring additional scrutiny.

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<sup>2</sup> <https://www.energy.gov/scep/articles/home-energy-rebate-programs-requirements-and-application-instructions>

## Quality Assurance (QA) Inspectors

- Qualifications:
  - Certification as a BPI Quality Control, Certified Building Safety Inspector (BSI), Certified Code Enforcement Official (CEO) or HERS Rater.
  - Experience in residential energy assessments and building science.
- Responsibilities:
  - Perform on-site and virtual QA inspections of energy upgrade projects.
  - Verify that upgrades meet program requirements for safety, effectiveness, and energy savings.
  - Document sampling rates, inspection findings, and corrective actions.

## Training Programs

All personnel involved in the review process will undergo regular training to keep their skills and knowledge up to date. This includes:

- Annual Training Workshops: Covering program updates, emerging technologies, and best practices in energy auditing and quality assurance.
- Web-Based Training Modules: On-demand modules focused on ANSI/BPI standards, combustion safety testing, and HVAC commissioning.
- Certification Renewal Support: Assistance in maintaining industry credentials through Continuing Education Units (CEUs).

By employing a team of well-qualified professionals with the right credentials and training, we ensure every aspect of our data and file review process is accurate, comprehensive, and aligned with the highest industry standards. The state will coordinate with the Southwest Building Science Training Center to identify potential Home Assessor candidates that receive training and credentials funded through the state's Training for Residential Energy Contractors (TREC) program. This program is currently offering the required BPI Building Analyst Professional (BA-P) credential needed for this role and the TREC program aims to expand this training.

## Inspections

### Onsite Inspections

The HEAR rebate program will require independent onsite inspections after the installation of approved rebate measures. The objective of the post-installation inspection is to ensure quality control and program adherence, thereby protecting consumers. The inspections will follow these guidelines:

## Minimum Inspection Requirements

- **First Five Projects:** To ensure newly approved program contractors/distributors/retailers comply with the program requirements, the first five projects installed will undergo independent onsite inspections by a qualified and specifically trained Quality Assurance Inspector. This requirement ensures new contractors/distributors/retailers comply with the program requirements from the outset.
- **Ongoing Inspection Rate:** After the initial five projects, a minimum of five percent (5%) of each contractor's/distributor's/retailer's projects will be inspected. The inspections will be conducted on a rolling basis with approximately 25% of the projected total analyzed each quarter.

## Sampling Methodology

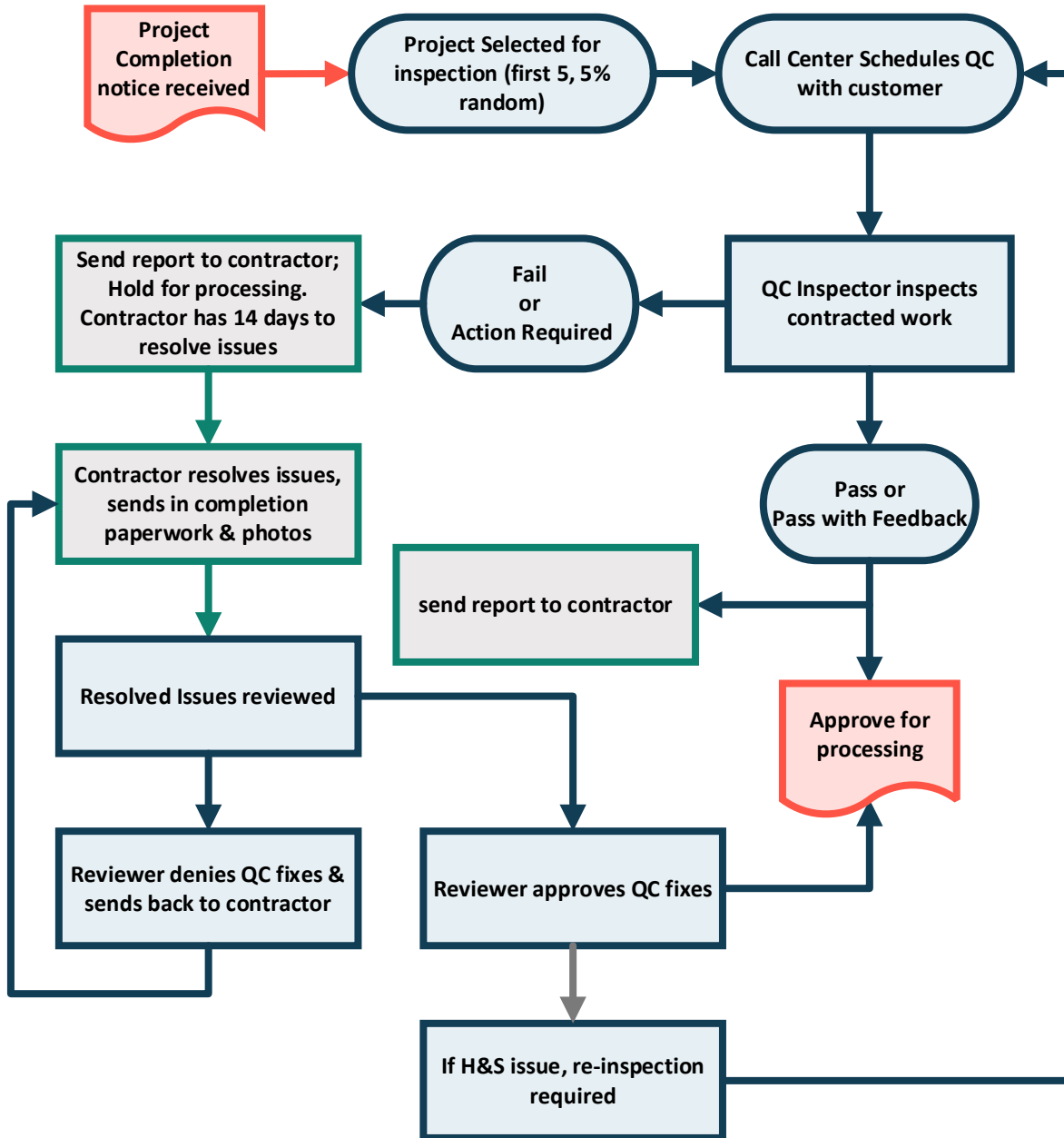
- **Statistically Significant Sample:** Inspections will follow a statistically significant sample based on a 90% confidence level and 10% precision, assuming a coefficient of variation of 0.5. Alternatively, 5% of all completed jobs for that program year will be inspected.
- **Issue-Triggered Inspections:** If issues are identified, a higher percentage of projects may be inspected continuously until the issues are resolved. Potential issues that would trigger an inspection include contractors/distributors/retailers who receive complaints or negative feedback, or who fail to comply with the resolution procedure process.

It is crucial to ensure that contractors/distributors/retailers understand and follow the installation and application requirements for each program. If the first five projects pass inspection, then a minimum of 5% of each approved contractor's/distributor's/retailer's completed projects will be selected for inspection moving forward. This selection will prioritize projects where a fossil fuel appliance was replaced to ensure homeowner safety, followed by a diverse selection of other projects. The projects selected for inspection will be randomly sampled to counteract fraud. Projects suspected of non-compliance will be sent for inspection on a case-by-case basis.

The on-site inspection is carried out by the RI Team. The RI Team will conduct the initial home assessment, and post installation inspection when required, creating continuity of the project, and maintaining accessibility of project documents.

Please see the process flow below for a detailed outline of the steps taken for the inspection.





*Project Inspection Process Steps*

**Project Selected for Inspection:** Project is marked as complete and is chosen as one the first five for a new contractor/distributor/retailer or part of the minimum 5% thereafter.

**Call Center Schedules QC with Customer:** The call center team contacts the customer to coordinate a time for the onsite or virtual QC inspection. If a customer does not want to allow the QC inspection, then the contractor’s/distributor’s/retailer’s next completed project will be selected for inspection until the sampling requirements are met.

**QC Inspector Inspects Work:** The QC inspector completes the scheduled inspection and provides all photos, documentation, and diagnostic testing.

**Inspector Designates Pass/Fail:** Based on the inspection report the project is designated as passed, passed with comments for the contractor/distributor/retailer, failed, or failed with action required.

**Feedback:** Feedback is reported to the contractor/distributor/retailer when the project fails, action is required, or the project passes with comments. The contractor/distributor/retailer has 14 days to respond to the request and update the project as required.

**Issues Resolved:** The contractor/distributor/retailer takes corrective action and submits additional or revised documentation.

**Reviewer Reviews QC Fixes:** The reviewer will evaluate the contractor's/distributor's/retailer's resubmissions and determine if the project passes or if additional action is needed.

**Approved for Processing:** The application has passed all QA and QC checks and will move into the next stage of payment processing.

### **Integrated Team Benefits**

The same team of assessors and project implementers will conduct the inspections. This approach offers several advantages:

- **Familiarity with Projects:** The team's familiarity with the initial assessment and energy modeling allows them to easily spot deviations from the scope of work.
- **Trust and Relationship:** Having the same team involved throughout the process fosters a trusting relationship with participants, ensuring smoother communication, better compliance, and openness to feedback.
- **Consistency:** This consistency helps in maintaining high standards and ensuring that all aspects of the project align with program requirements.

## **Inspection Protocol**

Inspectors will adhere to a documented onsite inspection protocol, which includes:

- **Visual Inspection:** A thorough visual inspection of the site and work conditions.
- **Scope of Work Verification:** Ensuring that the installed measures match the contracted scope of work and that any change orders are appropriately documented.
- **Diagnostic Testing Verification:** Verifying the accuracy of diagnostic test results, either by observing contractor/distributor/retailer tests or repeating the tests.

- **E-Sign Compliance:** Ensuring contract signatures comply with E-Sign requirements or are handwritten when E-Sign is unavailable.

The inspection process will be specific to homeowners, or multifamily building owners, as the building type impacts the way inspections are carried out. The applicant has a right to a timely and efficient inspection. The post-installation inspection will be conducted in a timely manner and will generally take less than one hour to complete. In the event there are numerous installations, a longer inspection may be required. The homeowner or renter will be notified in advance if a longer inspection is needed if a longer inspection is needed.

QA Inspectors will receive training and have access to approved tools and templates for data and photo collection. The inspector will meet minimum accreditation standards, including BPI Quality Control, a Certified Building Safety Inspector (BSI), or a Certified Code Enforcement Official (CEO). These certifications will ensure adherence to the applicable federal and state home/building regulations. A copy of the completed inspection report, the inspection status, and any flagged applications will be uploaded to the tracking and reporting system by the QA Inspector.

## Virtual Inspections

Virtual inspections can be conducted as needed; however, the complexity of inspecting building envelope measures, such as insulation, typically requires an in-person inspection. For a virtual site visit, the residence must have sufficient internet access and an appropriate device, such as a tablet or smartphone. A virtual auditing tool will be used to conduct these inspections, allowing the virtual inspector to direct the participant or contractor/distributor/retailer to specific areas of interest on site and to take photos. Participants or contractors/distributors/retailers will access this virtual tool through a link, simplifying the auditing process. The methodology follows the recommended practices for Remote Virtual Inspections (RVI) developed by the International Code Council (ICC), and the Arizona team will coordinate with the DOE for final review and process approval. A virtual inspector will meet the same training standards as onsite inspectors, in addition to specific training for the virtual auditing tool. Virtual inspections will complement onsite inspections under certain conditions. Virtual inspections will uphold the following requirements:

- **Methods Used:** Virtual inspections will utilize video recordings, interviews with site contacts, and photos taken during the virtual tour.
- **Assessment of Installed Equipment:** Nameplate photos of installed equipment will be taken during the virtual inspection
- **Additional Documentation:** Required project documentation will include invoices, change orders, specification sheets, and energy calculation models.

- **Inspector Qualifications:** Virtual inspectors will meet the same training requirements as onsite inspectors and receive additional training specific to the virtual inspection software.
- **Virtual Auditing Platform:** A virtual-auditing software solution will be used to conduct virtual inspections. The software has enhanced features to assist in auditing such as zooming in to get a detailed look, advanced markup tools to make notes and highlight areas, and the ability to capture images and videos for documentation purposes.
- **Privacy Agreements:** Privacy agreements will be shared and signed at the onset of the inspection. If participants decline virtual recording, an onsite inspection will be conducted.

## Quality Assurance and Follow-Up

Projects will be reviewed through QA by comparing collected assessment data with verified data collected during the onsite inspection. Any discrepancies found will be noted and reassessed by recalculating the predicted energy savings. A project will be flagged when there is over a 30% difference in predicted energy savings compared with the onsite inspection. If a home assessor produces more than three flagged projects, the implementer will require them to complete additional assessment trainings, which may include shadowing other assessors to relearn best practices. If an assessor produces additional flagged applications after retraining, they will receive a final written warning. Home assessors who produce more than five flagged projects will be removed from the approved catalog of home assessors and can no longer complete home assessments in the program.

A project that fails inspection will trigger a report to the contractor/distributor/retailer and program implementer. The contractor/distributor/retailer will have 14 days to remedy the issues found during the onsite inspection. If additional installation work is required by the contractor/distributor/retailer, this must be completed at no additional cost to the home/building owner. Additional installation will require another inspection to ensure compliance.

## Contractors, Distributors, Retailers and Other Partners

### Qualified List

To build the qualified network list of program partners, targeted statewide outreach will be conducted through public meetings, earned and paid media campaigns, and leveraging of existing trade networks, distributors and retailers to inform interested parties of the opportunities presented by the programs, give timelines for participation, and clearly define the goals of the programs. Arizona has currently only started working with one

Community Action Agency as part of its 50122 launch. Additional contractor, distributors and retailer partners will be identified through continued outreach and engagement with interested parties. Once identified and engaged, their specific roles will be discussed and defined, and program agreements will be put in place.

Prior to and throughout participation within the programs, contractors, distributors, and retailers will be required to maintain good standing with all applicable licensing agencies, comply with program requirements, perform work in compliance with guidelines issued by the OOR and the RI Team, observe all relevant federal and state laws governing labor standards, and adhere to skills standards for trades.

Qualification-based selections will be conducted to add businesses to the list. OOR and the RI Team will work collaboratively to define the needs of the programs from a program support standpoint. Based on these estimates, regional tiers of program partners will be created to ensure citizens across the state receive consistent service and the goals of the State and DOE are met. The qualified network list may be augmented as needed to guarantee these goals are achieved.

Qualified distributors and retailers will be required, through program participation agreements, to stock and make available for sale eligible appliances for qualified electrification projects. They must also have systems capable of providing rebates for qualifying equipment rebates that are consistent with state program and DOE requirements. The participation agreements with retailers and distributors will be developed and customized to each retailer and/or distributor to provide specific roles, responsibilities and program requirements they are expected to comply with.

Minimum qualification requirements will be established for contractors and they will need to provide current documentation of the required licensing, certifications, insurance and registrations. Qualified contractor shall maintain any and all applicable license(s) and insurance coverage(s) appropriate for the type of work the organization performs and in accordance with prudent business and construction industry practices and as required by Federal, state, or local law. Qualified contractors shall provide proof of such licenses and insurance coverages, as applicable and if requested by the RI Team or OOR.

The minimum insurance coverage includes:

- Workers' Compensation insurance with statutory limits of liability (or proof of Workers' Comp Exemption)
- Employers' liability insurance
- Commercial General Liability insurance, providing bodily injury and property damage coverage, including premises liability, products/completed operations liability, and blanket contractual liability
- Automobile liability (covering owned and non-owned vehicles), coverage

Reference and qualification requirement may include, but will not be limited to, the following:

- 3 customer project references
- 3 peer trade references
- HVAC Excellence or North American Technician Excellence (NATE) certification
- Credentials recognized by the U.S. Department of Energy as “Energy Skilled”
- EPA 608 Certificate
- BPI Building Analyst Professional (BA-P)
- For multi-family only – BPI Multi-family Building Analyst (MFBA)
- Optional: OSHA 10 or 30 Training course completed

The credentials recognized by the U.S. Department of Energy as “Energy Skilled”, the BPI Building Analyst Professional (BA-P) and other accredited courses are intended to align and consider contractors trained with the state’s 50123 Training for Residential Energy Contractors (TREC) program.

Contractors, distributors, and retailers will not be responsible for calculating energy savings or utility bill impacts. The calculation of energy savings and utility bill impacts will be completed by the RI Team using standardized engineering calculators for the Home Electrification & Appliance Rebate program. Both tools will be integrated into the program system of record to ensure only allowable and consistent methods to calculate savings are used.

Contractors, distributors, and retailers will be responsible for upholding the guidelines of the program, adhering to customer service standards, ensuring timeliness of project completion, meeting performance targets of OOR and the RI Team, and carrying out the goals of the State and DOE in service of citizens. In instances where three significant performance issues or findings of non-compliance are identified, contractors, distributors, or retailers may be delisted from the program. The program implementer will no longer assign eligible projects to delisted contractors, and the disqualified distributors or retailers will not be allowed to reserve or reimburse rebate coupons. Agreements between the delisted contractor, distributor or retailer, OOR, or the RI Team will be terminated or void.

## Contractor, Distributor, Retailer Education

OOR and the RI Team will educate building owners and contractors/distributors/retailers on the expected returns on investment for various envelope and mechanical improvements. Educational efforts will be performed using a multifaceted approach, including informational sessions, local expert presentations, FAQs and information libraries posted on OOR’s website, and direct communication with building owners. For example, the implementation team will work directly with building owners of multifamily

structures to identify the most cost-effective scope of work, sequence of repairs, and creation of a capital stack to complete further work.

OOR will publish its contractor list and regional maps on its website and its implementer will provide call center and case management support to ensure consumers understand options provided by the programs.

## Installation

Installation requirements and guidelines protect consumers and ensure they are receiving comprehensive and high performing upgrades. Contractors/distributors/retailers will be required to understand and accept the program installation standards to install rebate upgrades under the Home Energy Rebate programs.

### Installation Standards

#### Compliance with Laws and Standards

Installers must ensure all work complies with local and state laws, permits, codes, and industry standards and includes adherence to guidelines set by recognized industry organizations such as ENERGY STAR®, , the Air Conditioning Contractors of America (ACCA), and the National Renewable Energy Laboratory (NREL). Specifically for heat pump installations, compliance with the following standards will be required:

- [ACCA Manual S: Residential Equipment Selection](#), American National Standards Institute (ANSI)/ACCA 3-Manual S-2014
- [ACCA Manual J: Residential Load Calculation](#), ANSI/ACCA 2-Manual J-2016
- [ACCA Standard 5: Heating Ventilation Air Conditioning \(HVAC\) Quality Installation Specification](#) ANSI/ACCA 5 QI-2015
- [ACCA Standard 9: HVAC Quality Installation Verification Protocols](#) ANSI/ACCA 9 QIVP

These standards will be available on the program's website to ensure transparency and accessibility for both contractors/distributors/retailers and consumers.

#### Quality Installation Standards

Contractors/distributors/retailers are required to follow minimum quality installation standards for rebated technologies. This includes:

- Proper design, installation, and testing of equipment.

- Use of standardized and sequenced procedures to develop a detailed project scope of work, ensuring clarity and completeness.
- Obtain the appropriate and applicable permits for the installation.

## Standardized Procedures

Installers must use standardized procedures for developing detailed project scopes and invoices. This includes providing a comprehensive list of home improvement measures, specifying equipment recommendations, and including detailed installation requirements and conditions. OOR and the RI Team will provide guidance on prioritizing upgrades that achieve the greatest utility bill reductions, energy savings and impact on greenhouse gas (GHG) reduction when feasible and sensible. Examples include reasonable costs and measures that do not notably increase the homeowner's energy bill. Installations must follow manufacturers' instructions to ensure optimal performance, energy savings, and indoor air quality.

## Enforcement of Installation Standards

### Quality Assurance Processes

OOR and the RI Team will establish robust quality assurance (QA) processes to verify and document compliance with installation standards. This includes:

- A mandatory QA review by the installation contractor for each project, which may involve visual inspections, system commissioning, diagnostic testing, and combustion safety testing.
- Submission of QA documentation, including geo-coded photos, test results, and invoicing as part of the application materials.
- A desk review by the program implementer, as described above, to verify compliance, including reviewing model numbers, documentation, and ensuring values align with program requirements. Projects flagged for discrepancies may be subject to additional QC checks, including virtual or physical site inspections.

## Contractor Compliance

Qualified contractors/distributors/retailers must acknowledge their obligation to comply with all applicable laws, ordinances, regulations, and codes as part of their registration application. They must ensure their sales language matches the contract language to maintain clarity and transparency for consumers. The RI Team will provide a contract template to help maintain clarity. If a contractor chooses to forgo the contract template,

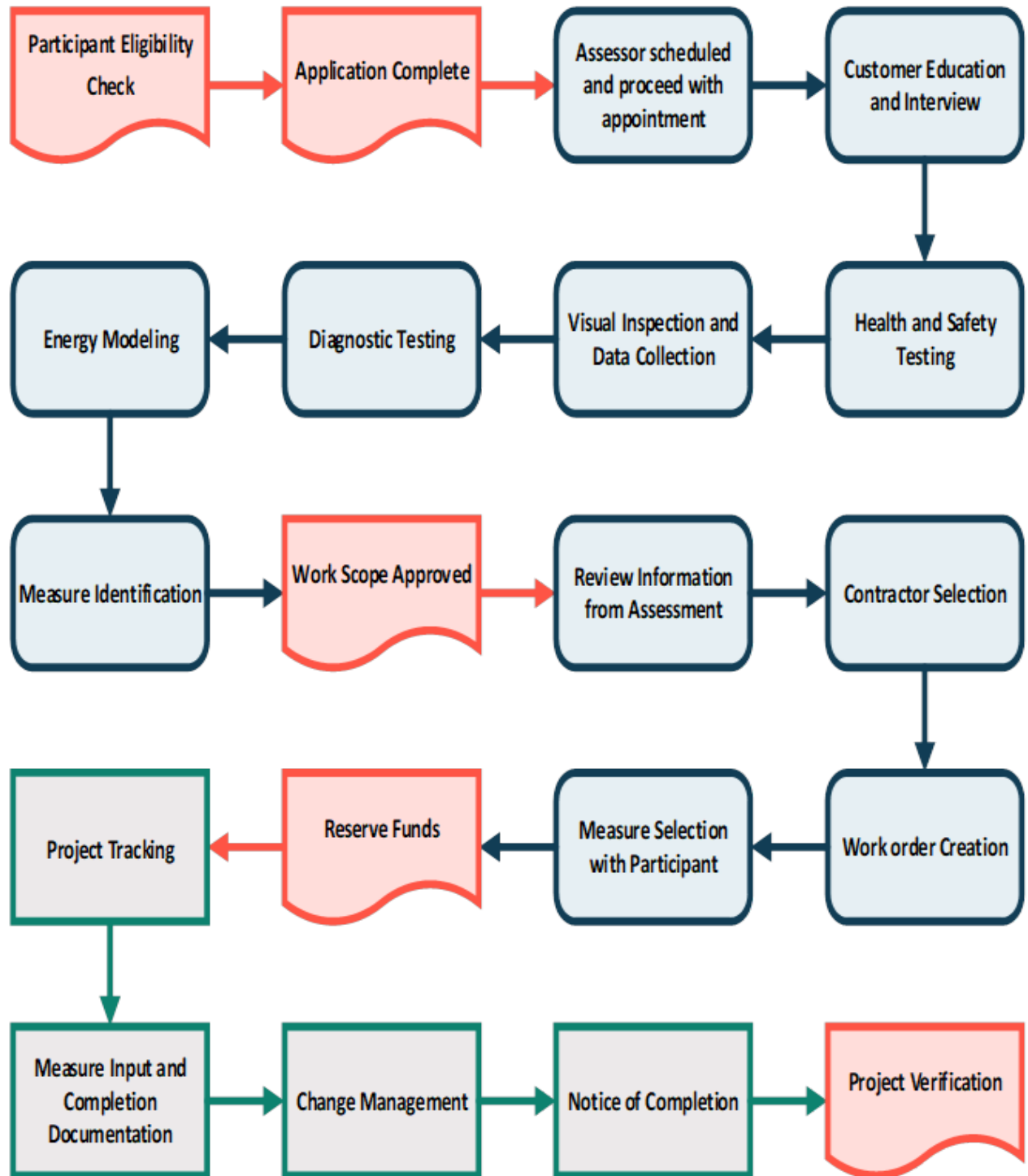


they must provide and receive approval of their alternative contract to the program implementers. Additionally, sales and marketing materials such as templates, guidelines, and outreach tools will be available on the program website for download or by email request. This ensures consistent messaging, effective outreach, and builds trust in the program. Contractors/distributors/retailers must provide samples to the OOR and the RI Team for a compliance check where co-branding is utilized with the state's Home Energy Rebate programs.

## Detailed Installation Process

RI Team home assessors will conduct a comprehensive home assessment to develop the project scope of work. The assessment includes evaluating the current state of the home, identifying areas for improvement, and recommending suitable technologies and upgrades. The project scope will be detailed, specifying the recommended equipment, installation requirements, and conditions. A detailed scope of work ensures all stakeholders have a clear understanding of the work to be performed and the expected outcomes.

To promote consistency and quality in project execution, the standardized procedures outlined below will be followed:



*Installation Process Steps*

**Participant Eligibility Check and Signed Terms & Conditions:** Ensure the participant meets eligibility requirements and has signed the terms and conditions.

**Assessor Scheduled and Proceed with Appointment:** Schedule an assessor to verify the project scope and proceed with the appointment.

**Customer Education and Interview:** Educate the customer about the process and interview to gather relevant information.

**Health and Safety Testing:** Conduct necessary health and safety tests to identify potential hazards.

**Visual Inspection and Data Collection:** Perform a visual inspection of the site and collect relevant data.

**Diagnostic Testing:** Carry out diagnostic tests to assess the current state of the systems.

**Energy Modeling and Measure Identification:** Use energy modeling to identify suitable measures for the project.

**Review Information from Assessment:** Review all collected information to finalize the project scope.

**Contractor Selection and Reserve Funds:** Select a contractor for the project and reserve the necessary funds.

**Work Order Creation and Measure Selection:** Create a work order and select the appropriate measures to be implemented.

**Project Verification and Tracking:** Verify the project details and track its progress.

**Measure Input and Completion Documentation:** Document the input and completion of each measure.

**Change Management:** Manage any changes to the project scope or execution.

**Notice of Completion:** Issue a notice of completion once the project is finalized.

This workflow ensures a systematic approach to developing and executing the project scope, enhancing the quality and consistency of installations.

## Installation Sequence and Quality Assurance

### Installation Sequence

Installations will be performed in sequential order to prevent defects and maximize energy savings. For example, if the home is eligible for the HOMES program, the HOMES program upgrades will be assessed and implemented first, followed by HEAR program upgrades.

## Quality Assurance Checks

Contractors/distributors/retailers must complete QA checks for each project, which may include:

- Visual inspections to ensure proper installation.
- System commissioning to verify proper operation.
- Diagnostic and combustion safety testing to ensure safety and efficiency.
- Submission of QA documentation, including photos and test results.

## Implementer Review

The program implementer will review all QA documentation as part of the application process. Any discrepancies or missing information will be flagged for correction. The implementer may conduct additional QC checks, including virtual or physical site inspections, to verify compliance.

## Consumer Education and Support

### Documentation and Education

Contractors/distributors/retailers will provide consumers with all necessary documentation, including owner's manuals, warranty information, service agreements, maintenance plans, and recommended system settings to ensure consumers are well-informed about their new systems and how to maintain them for optimal performance.

### Ongoing Support

Consumers will have access to support from contractors/distributors/retailers and program implementers for any questions or issues that may arise post-installation.

## Equipment Standards

This section includes a sample of the equipment standards to be followed by the OOR and the RI Team to ensure that contractors/distributors/retailers supply high-quality equipment to consumers.

## Residential HVAC Systems

All residential central air conditioners and heat pumps must meet the energy conservation standards specified in the Code of Federal Regulations (CFR) at 10 CFR Part 430 as of January 1, 2023. Key metrics include:

- Seasonal Energy Efficiency Ratio (SEER)
- Energy Efficiency Ratio (EER)
- Heating Seasonal Performance Factor (HSPF)

Minimum Efficiency Levels: The minimum efficiency levels for residential heat pumps and specialty AC/HP systems are determined by the US Department of Energy and apply nationwide:

- SEER2:  $\geq 15.2$
- EER2:  $\geq 12.0$
- HSPF2:  $\geq 8.1$

Cold Climate Heat Pumps: For cold climate heat pumps, performance metrics must be confirmed through the ENERGY STAR Cold Climate Heat Pump Controls Verification Procedure, ensuring that they meet the required performance at low ambient temperatures.

For central heating and cooling systems suitable for multifamily buildings, the OOR and the RI Team will propose alternative equipment efficiency standards when ENERGY STAR certification is unavailable for the DOE to review.

## Residential Water Heaters

Heat pump water heaters must comply with the standards outlined in the Residential Water Heating Initiative. These standards include meeting specific efficiency and performance criteria as defined by ENERGY STAR and other regulatory bodies. For central water heating systems used in multifamily buildings, OOR and the RI Team will propose an alternative efficiency standard for DOE review, when ENERGY STAR certification is unavailable.

Advanced Specifications: The Advanced Water Heating Specification outlines requirements for high-efficiency models, including:

- Coefficient of Performance (COP) for heating and cooling

- Noise levels
- Maximum supply water output temperature
- Annual electric power consumption

## Financing and Consumer Protection

If financing mechanism are coordinated and/or offered through the Arizona Home Energy Rebate programs, the following protections will be afforded to ensure their financial well-being and informed consent:

### Ability to Repay Determination

Contractors/distributors/retailers must ensure the consumer can afford the home improvements or appliances without considering any expected savings on their energy bills. This determination protects consumers from financial hardship due to fluctuating household usage and market conditions. Proof of income, assets, employment, credit history, and monthly expenses can determine creditworthiness.

### Clear Terms and Conditions

Contractors/distributors/retailers must provide clear, written advance disclosures detailing the number of payments, monthly payment amounts, late fees, and other key terms.

### Disclosure and Cooling-Off Period

The disclosure and contract signing requires a mandatory seven-day waiting period, which can only be waived in the case of a personal emergency. The property owner must provide a handwritten statement or a transcribed and wet-ink signed statement explaining the emergency and confirming they understand they are waiving the waiting period. In non-emergency situations, there will be a three-day period where the consumer has the right to cancel the contract without penalty, after signing. During this timeframe, no work can commence. This should be clearly displayed on the contract near the lender's signature location. The RI Team will provide examples of acceptable written disclosures regarding the seven-day cooling-off period and three-day right to cancel. The assessor will provide a clear explanation to the consumer about the seven-day waiting period between the disclosure and contract signing and their right to cancel the contract within three days of signing.

## Continuous Improvement

The State of Arizona and OOR are committed to preventing and mitigating fraud, waste, and abuse to ensure appropriate and effective use of the Home Energy Rebate funds. Together with the RI Team, OOR will work to ensure customer satisfaction, program integrity, and continuous improvement, as outlined in this section of the consumer protection plan, all of which will provide significant risk mitigation of prevention of fraud, waste, and abuse.

## Unfair Business Practices

The Arizona Home Energy Rebates program will implement measures to prevent unfair business practices and avoid or address poor program function. The program will enact proactive measures, specifically, through the participation agreement with consumers, program requirements for participating contractors/distributors/retailers, and verification checks to prevent unfair business practices. The program will follow the guidelines within the IRA Home Energy Rebates: Data & Tools Requirements Guide<sup>3</sup> to collect the appropriate data, such as the utility account number, to ensure compliance with rebate limitations per consumer. The program will ensure third party entities, vendors (e.g., software vendors), and contractors/distributors/retailers meet the specified qualifications through the use of a qualified contractor network.

To ensure protection of participant data, the program has a plan for responding to cyber-intrusion incidents. The plan includes an investigation to establish the cause and scope of the breach, securing data and notifying affected persons, if relevant, along with government officials and other affected parties. Information from any security breaches will be utilized to prevent future occurrences. Third parties and contractors/distributors/retailers with access to sensitive participant information must also provide proof of substantial cyber security insurance and liability insurance.

To facilitate reporting of any potential fraud, waste, or abuse, OOR and the RI Team will establish a process for fraud referrals, as described in the resolution section of this blueprint plan, which will include a hotline and contact form for consumers to anonymously report instances of suspected fraud, waste, or abuse. The RI Team will include that hotline on the program's website and on information provided to participants and contractors/distributors/retailers. Associated contact forms will be made available to meet accessibility standards and the needs of non-English language speakers. Once a complaint is received, the OOR and the RI Team will gather the relevant facts and refer

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<sup>3</sup> <https://www.energy.gov/scep/articles/ira-home-energy-rebates-data-and-tools-requirements-guide>

cases to the Arizona Office of Attorney General for further investigation and/or prosecution. If the program team or the Attorney General's office finds probable cause of substantial fraud, waste, or abuse, the RI Team will review whether any program procedures need to be modified to prevent future incidents and will make appropriate adjustments.

## Leveraging Automation

The RI Team will leverage automation in multiple ways. As required by DOE, processes and data systems will use a standard agreed upon data model to leverage Application Programming Interface (APIs) where available, automated secure data file transfers, and error handling alert mechanisms where applicable to ensure consistency, data accuracy, and minimize errors.

The RI Team will employ a system of record that stores and tracks case-level information, including participant information, home information, and project-related details, statuses, and assessment and quality assurance outcomes, and predicted energy and non-energy impacts from the program installations and home improvements. We will also use this system to record informal and formal (survey-based) participant feedback with reporting tools that will allow the team's evaluation group to track, analyze, and report on results.

## Realizing Performance with Measurement and Evaluation

OOR will utilize measurement and evaluation to analyze program performance, specifically program successes and areas of improvement. OOR and the RI Team will measure and report against targets such as the number of open tickets, frequency of data errors, and system performance metrics on a semi-annual basis. Insights from these reports will leverage ongoing insights throughout the duration of the program and identify potential improvements to protect customer satisfaction. Program evaluation and customer feedback methods are described in more detail in the Program Improvement section below. OOR and the RI Team will continuously monitor and evaluate program performance using the program's accounting firm (which will review payment requests) and using the State of Arizona's financial systems to continue mitigation of fraud, waste, or abuse.

## Program Improvement

Built-in program improvement is a central feature of Arizona's Home Energy Rebates programs. A key member of the RI Team operates a business unit providing internal and third-party program evaluation services. This business unit, the Advisory Services practice of Resource Innovations, will serve as an internal evaluator to track program quality and



outcomes, identify program improvements, and maintain records for reporting to OOR and the DOE. This function will support the program to respond quickly to improvement needs and opportunities and facilitate any subsequent third-party evaluation DOE may conduct in the future.

The RI team will develop an evaluation plan prior to program launch. At a minimum, the plan will include the following elements and processes:

**Vendor and Staff Level Performance** – As noted throughout this blueprint plan, the technical performance and quality of individual contractors/distributors/retailers, vendors, and assessor staff will be reviewed as part of our quality assurance process. This process will include performance tracking in the system of record software, such as case-specific corrections, remediation, and person- and firm-level training and adjustments needed to address low performance.

**Systematic Performance Concerns** – In addition, the RI Team will review technical performance data from the quality assurance process to identify common quality assurance failures across the network of contractors/distributors/retailers, vendors, and staff. Identification of common issues will result in broader communications, training, or technical assistance for the applicable pool of contractors/distributors/retailers, vendors, or staff.

**Participant Feedback** – Participant feedback received via the case managers and post-project surveys will indicate whether the participation process is working well, evaluate household and occupant satisfaction with the home improvements, and point to any system performance issues. Participant feedback will be tracked in the system of record and reviewed by the RI Team’s internal evaluation group as described in the sections above and below.

**Implementer and Stakeholder Feedback** – Individual members of the RI Team and stakeholders may observe process issues or have suggestions for improvements. The RI Team’s internal evaluation team will create processes by which implementation team members can note challenges or suggestions for compilation. From there, a rotating process will solicit observations on the program’s processes and performance in one-on-one conversations or dedicated group conversations during team meetings. Those who work closely with external stakeholders will be asked to report stakeholder feedback during these processes.

## Internal Evaluation Review

The RI evaluation team will conduct interviews, data reviews of the system of record, and file reviews as part of routine internal evaluation process, including scheduled reviews and estimates of project impacts. Minor issues or potential process improvements will be forwarded to the respective teams for their consideration, while major concerns or deviations from expected outcomes (in participation, impacts, etc.) will be discussed internally by the project team with OOR. As needed, the evaluation team will suggest and investigate unexplained areas of concern.

As the RI Team is involved in the implementation of the Home Energy Rebate programs in multiple states, this review will take a multi-state perspective to combine lessons learned across states. The goal is to identify best practices among variation in state processes.

## Reporting

The Continuous Improvement Team will report monthly program performance metrics to the internal program team for discussion, as needed, and included in reports provided to OOR and to DOE. OOR will compile all relevant and necessary financial and performance information for quarterly and annual reporting to the DOE. OOR will permit DOE access to QA/QC processes and records. QA/QC records will be retained and available for a period of three years from the date of submission of the final expenditure report.

## Budget and Financial Performance

OOR and the RI Team will implement measures to ensure successful budget and financial program performance. OOR will track monthly spending and report on it annually to the DOE to verify administrative limits are maintained. The State of Arizona has assigned the OOR the responsibility of governing and monitoring the program's budget and financial performance to confirm that funds are being used efficiently and effectively. Under OOR's financial management system, all costs are reviewed to be reasonable and allowable prior to disbursement. Additional metrics will monitor Justice40 goal progress and ensure low-income and multifamily targets are on track. Real-time metric tracking by the RI Team will demonstrate the proportion of funds committed by income category and property type (single- and multifamily).

Funds will be encumbered for projects once accepted, and financial limits will be communicated to all relevant stakeholders at regular intervals to inform how to support market actors and customers when program funds are exhausted. The Arizona Governor's

Office of Resiliency will be responsible for communicating the status of available funds to participants throughout program operation and after the program ends.

OOR will leverage the DOE approved Budget Allocation Calculator and closely track and report spending both within the administrative and rebate fund categories. The State of Arizona reports will be prepared in accordance with Generally Accepted Accounting Principles (GAAP), Financial Accounting Standards Board (FASB) statements, and Governmental Accounting Standards Board (GASB) statements.