

District of Columbia Department of Energy and Environment

IRA Section 50121 Home Efficiency Rebates Consumer Protection Plan

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Introduction

The District of Columbia Department of Energy and Environment (DOEE) will manage roughly \$29 million in federally funded Home Efficiency Rebates (HER) to assist affordable housing buildings with energy efficiency upgrades and electrification.¹

DOEE will use HER to expand the existing [Affordable Housing Retrofit Accelerator](#) (AHRA), a program implemented by the DC Sustainable Energy Utility (DCSEU) that provides technical and financial assistance to owners and managers of qualifying multifamily affordable housing buildings to make their buildings more energy efficient. DCSEU will serve as the implementer for the Home Energy Rebates programs under contract with DOEE.

This Consumer Protection Plan includes mechanisms for submitting feedback or complaints to DOEE, complaint resolution procedures, quality assurance and quality control procedures, contractor qualifications, rental affordability requirements for certain properties, and continuous improvement processes. Parts of this Consumer Protection Plan may reference the District's contract with the DCSEU, which is administered by DOEE and can be accessed here: <https://doee.dc.gov/service/dcseu-contract>.

Unless otherwise specified, the "consumer" being protected by this plan is generally the entity who executes an agreement with DCSEU to participate in the federally funded Home Energy Rebates programs.

DOEE will publish the Consumer Protection Plan publicly on its website: <https://doee.dc.gov/service/ira-rebates-tax-incentives>.

Consumer Feedback

Filing Complaints, Concerns, and Issues

Consumers can access general information on the Home Energy Rebates Program; see Table 1. This information will be made available at public events and on DOEE Home Energy Rebates education and outreach documents.

Additional outreach and education materials will be created that aim to provide consumers with accurate, easily understood information about the Home Energy Rebates programs, including about:

- eligibility and qualifications for rebates
- how any available rebates may apply to products
- qualified contractors
- assurance that installation of any products under the Home Energy Rebate programs are completed in a quality manner that complies with District laws, permits, codes, and industry standards

¹ Electrification involves replacing home appliances and systems that burn fossil fuels with appliances and systems that are powered by electricity; for example, replacing a gas stove with an induction stove, or a gas-powered furnace with a heat pump for home heating and cooling. Electrification can help reduce harmful greenhouse gas emissions that cause climate change.

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- energy efficient products, including ENERGY STAR products, if applicable
- confidentiality of any financial or other Personal Identifiable Information
- how to communicate questions, concerns, complaints, or other feedback; when to expect a response to their communication; information on any corrective actions that will be taken in response to their communication; and information about any dispute resolution process
- consumer responsibilities and obligations to cooperate with program administrators, including potentially: (1) consenting to a home energy assessment prior to work being done; (2) consenting to the testing of installed products during and/or after installation is complete; (3) consenting to an inspection and photographing of any products after installation if requested by DCSEU; and (4) providing the District with access to utility bills upon request

These materials will be available digitally at the websites described below or upon request, and in hard copies at public engagement events.

Table 1

Webpage	Description
IRA Rebates & Tax Incentives https://doee.dc.gov/service/ira-rebates-tax-incentives	This landing page on DOEE’s website provides general information about implementation of the Home Energy Rebates Programs in the District along with hyperlinks to landing pages maintained by DCSEU for the Affordable Housing Retrofit Accelerator (AHRA) and the Affordable Home Electrification Program (AHEP). Consumers can request webpage be translated to the following six languages: Amharic, Chinese, French, Korean, Spanish, and Vietnamese.
Affordable Housing Retrofit Accelerator https://www.dcseu.com/affordable-housing-retrofit-accelerator	This DCSEU landing page provides information on the Affordable Housing Retrofit Accelerator along with building qualification information and an interest form for building owners/property managers who would like to apply or request additional information.
Affordable Home Electrification https://www.dcseu.com/affordable-home-electrification	This DCSEU landing page provides information on the Affordable Home Electrification Program along with income qualification information and an interest form for homeowners or building owners who would like to apply or request additional information.

DOEE encourages consumers with inquiries, complaints, or concerns regarding contractors/installers to reach out directly to DCSEU, the program implementer.

Consumers can contact DCSEU in the following ways:

- Accessing a webchat at www.dcseu.com
- Calling (202) 479-2222 or toll-free (855) MY-DCSEU
- Emailing info@dcseu.com

Consumers can also schedule an in-person meeting through the same channels or through to-be-developed service platforms like Microsoft Bookings. Additionally, consumers can attend public community events, attended by DCSEU staff each month to share feedback. These feedback options are shared with consumers via the DCSEU website, over the phone, and through survey invitations. DCSEU also has translation services for multiple languages via

phone. The DCSEU currently utilizes Google Translate services on its website in Korean, Chinese, and Spanish and will expand to also include Vietnamese, French, and Amharic.

Under the assistance agreement that will be executed with DCSEU, owners and managers of multifamily affordable housing properties and/or rental units shall comply with all tenant notification requirements required by law. Additionally, owners and managers will be required to will be required to notify tenants in advance of any planned upgrades that could potentially create a disturbance to tenants, impact residents' utility bills, or result in in-unit changes to equipment and/or their operations, as well as provide information to tenants on who to contact with any inquiries or complaints. Under the rental affordability agreement that will be executed by the property owners or managers, they must notify tenants of rental affordability protections (see Rental Affordability section).

DOEE will provide households, building owners, contractors/installers, and customers with the ability to ask questions and to file complaints, concerns, or issues related to specific work performed or the Home Energy Rebates programs generally, including the service provided by the DCSEU, contractors/installers, and/or DOEE. Where applicable and appropriate, inquiries, complaints, or concerns received by DOEE may be referred to DCSEU for follow-up. Consumers can ask general questions about the District's programs or file a complaint or concern regarding program services by:

- Sending an email to doee.electrification@dc.gov. DOEE staff will regularly monitor the inbox and respond to emails that require follow-up or resolution within five (5) business days.
- Calling (202) 807-9007. Translation services are available in multiple languages. DOEE staff will create and maintain a written record of communication over the phone.

Consumer Satisfaction and Procedures for Addressing Negative Feedback

DCSEU will send program surveys approximately 14 days and again 3 months after the date a rebate has been issued. A list of survey questions can be found in Appendix A of this plan. DCSEU will also maintain and report survey data to DOEE and DOE. For efforts to evaluate satisfaction and address negative feedback from rental tenants who are the end-user of work performed/installed through AHRA, see the Consumer Protections for Renters section of this plan and the Planned Household Engagement section of the Community Benefits Plan.

DCSEU will track customer feedback and complaints received by DOEE and DCSEU using a customized Customer Relationship Management (CRM) platform, Tracker. Data points collected include type of feedback (positive, general, negative), complaint or feedback narrative, service area, and resolution activities. When DCSEU receives negative feedback, the feedback is recorded in the CRM platform and assigned to a service manager, who is responsible for developing a resolution if the feedback pertains to a specific project or application. DCSEU will notify DOEE of all complaints and their resolution.

For complaints received about contractors/installers or work performed, see the Resolution Procedures section.

DOEE and DCSEU will incorporate consumer feedback into continuous program improvement. Program design and implementation documents will be reviewed and updated on an annual basis.

Resolution Procedures

Conflict Resolution Procedure

Any staff member at the DCSEU could learn of a dispute between a customer and a contractor, including by fielding a complaint from a customer, receiving an inquiry from the DOEE, by conducting a routine desk audit of an inspection report, or otherwise discovering that a contractor has failed an inspection. When a DCSEU staff member receives notice of a dispute or issue, they will document that issue in Tracker, DCSEU's customer relationship and project management system of record, along with the date of the report, the customer's name and contact information, the contractor's name and contact information, and a brief description of the dispute, including relevant dates.

The staff member will then email the DCSEU program manager to notify them of the newly registered dispute. The matter will be assigned to the appropriate DCSEU program staff. No later than five (5) business days after the DCSEU has been notified of a dispute, the assigned program staff member will call the customer and the contractor to investigate the matter, make an initial attempt resolve the dispute, and discuss next steps toward resolution if that initial attempt is not successful, such as the corrective actions that may be appropriate for the type of dispute at issue. Actions may include but are not limited to re-inspecting a project to confirm proper installation of a measure or directing a contractor to fix an improper installation at no cost to the customer within a timeframe specified by DCSEU; the contractor will be required to agree to this protocol as part of their subcontract with DCSEU. DOEE expects significant progress toward resolution once these steps are taken.

However, if the initial attempt to resolve a dispute is not successful, the team member will update the program manager, who will then advise DOEE staff, DCSEU's legal team, and DCSEU's senior leadership within two (2) business days. The staff person will follow up with the customer and contractor no less than once a week until the issue reaches resolution or becomes subject to an official proceeding, keeping DOEE staff apprised of any updates or progress.

The DCSEU staff member designated to handle the dispute will be responsible for ensuring that all appropriate stakeholders are included in communications and receive regular updates, that DCSEU is pursuing the appropriate corrective action, that corrective action occurs, and that all activity and outcomes are documented in Tracker. Tracker records must be updated regularly to reflect, among other things, actions taken toward resolution, the outcome of the dispute, and the date of resolution. A senior member of the DCSEU team will oversee the dispute resolution framework, monitoring the rollout of the new process, coaching portfolio managers and program staff on adherence to the plan and best practices, identifying and correcting deficiencies in the plan, and regularly updating DCSEU leadership and DOEE on the plan's status and potential areas of improvement.

Deficiencies and Unfair Business Practices

The DCSEU will also maintain robust controls to identify and address systemic issues, which may include repeated deficiencies by, or complaints against, the same subcontractor or common problems (three or more instances) across subcontractors. At a minimum, those controls will include the program manager drafting and circulating to DCSEU staff a quarterly quality assurance (QA) report, which will contain descriptions and analysis of disputes from the previous three months and draw from desk reviews of inspections for all projects completed in the previous three months to identify themes and patterns of potential systemic issues. The QA report will also contain recommendations for resolution and remediation activities to respond to systemic issues, which will be elevated to DCSEU's operations director for implementation.

Remedial and punitive actions for deficiencies in work by contractors/installers include but are not limited to: required coaching and training, temporary suspension from the program, and permanent delisting from the qualified contractors list. Below are examples of the remedial and punitive actions for deficiencies in work by contractors/installers.

- Required training and/or coaching: Training and/or coaching provided by the DCSEU may be appropriate when DCSEU staff learn of a non-systemic issue with a particular contractor; for example, issues related to worksite cleanliness, mistakes in invoicing, unresponsiveness, or failing an inspection. Broader training and coaching may be appropriate when the DCSEU identifies common issues across contractors/installers. Anonymized findings may also be shared across contractors for educational purposes outside of a formal training. When a qualified contractor/installer receives coaching or training for one of these reasons, program staff will capture that in Tracker and flag the issue for attention in subsequent inspections. If the issue persists, DCSEU will evaluate whether further coaching is reasonably likely to lead to improvement or if suspension is required.
- Temporary suspension from the program: Based on the severity or repeat nature of the issue, a contractor/installer may be temporarily suspended from program participation for deficiencies including but not limited to: failure to remediate an issue after training or coaching; health and safety violations; loss of licenses or other required credentials; loss of required insurance coverage; or material breach of any warranty or commitment to the DCSEU or a customer.
- Permanent removal from the qualified contractors list: Based on the severity or the repeat nature of the issue and as outlined in the DCSEU's contract with the contractor/installer as it relates to breach, a contractor/installer may be permanently removed and delisted from program participation when it has not come into compliance with the conditions to lift a temporary suspension within a reasonable period; has engaged in use or employment of dishonesty, fraud, deception, misrepresentation, false promise or false pretense; has acted in a negligent manner that poses a significant risk to the program; or otherwise demonstrates an unwillingness or inability to substantially comply with program requirements or ensure safe and effective project work.

The prospect of temporary suspension or program removal and the corresponding loss of business and payment will serve as the primary general deterrent for contractors/installers to engage in unacceptable practices. Likewise, DCSEU will leverage that prospect in individual disputes to compel a contractor/installer to correct a deficiency or pay for repairs, etc. to make the customer whole. For example, the DCSEU will advise a subcontractor of the likelihood of suspension or delisting if it does not reach a fair settlement at mediation.

Other Provisions

The DCSEU will maintain records from its inspections. Sampling rates will be defined in the program design and implementation plan for the program, which is maintained by DOEE and DCSEU. Findings will also be recorded. When a unit or building fails an initial inspection, contractors/installers must remediate any issues within a period of time specified by DCSEU. A follow-up inspection will be completed to ensure corrective actions were taken.

Customers participating in the program will enter into three-way agreements with DCSEU and the contractor/installer. DCSEU will ensure that such agreements do not contain mandatory arbitration clauses. Participation agreements may include a requirement to attend non-binding mediation in certain circumstances, which is offered to D.C. residents at no cost through the Multi-Door Dispute Resolution Division.

Additionally, all relevant agreements will include reference to the holder-in-due-course rule to maintain consumer protections when the contract is assigned to a third-party creditor.

Data Review

DCSEU will conduct data and file reviews of all projects. DCSEU will summarize and report back to DOEE on project progress and will provide data access to DOEE via a shared file platform and/or account view access. DOEE reserves the right to audit all required review elements and supporting documentation upon request. DOEE will have access to all active reporting from the system used by DCSEU for implementation.

Validation of Audit and Modeling Tools and the Data Collected

For all AHRA projects that apply HER rebates, auditors will be required to complete an ASHRAE Standard Level 2 audit and build a standardized audit through Pacific Northwest National Laboratory's (PNNL) Building Energy Asset Score/Audit Template. All submitted audits will undergo both manual and automated data checks. DOEE and DCSEU staff conduct manual administrative and technical reviews of all audits to ensure that the audit provided adheres to ASHRAE Level 2 standards and, where feasible and consistent with the ASHRAE audit requirements, includes information required under Appendix A of the [Data & Tools Requirements Guide](#). These reviews by DOEE and DCSEU include validating that appropriate multifamily unit sampling was conducted and establishing baseline energy usage of the building. DOEE has implemented automated data quality checks and validation controls for Audit Template submissions that identify missing required data points and confirm that provided baseline energy usage matches reported building usage from annual energy benchmarking submissions. Evidence must include site photos and/or diagnostic testing data.

DOEE and DCSEU also conduct a technical evaluation of the proposed energy efficiency measures that encompasses review of proposed replacement technologies or conditions to ensure feasibility and establish efficiency metrics. DOEE and DCSEU also evaluate proposed measures to identify and scrutinize any assumptions used in the calculations, and confirm that accepted baseline and post-installation values are utilized in the energy savings calculations.

DCSEU will collect and maintain the data required in [Appendix B of DOE's required elements for a consumer protection plan](#). DOEE reserves the right to periodically conduct audits to review submitted data for accuracy and validity.

Validation of Project Address, Scope, and Installation

All rebate-funded projects will be centrally coordinated through DCSEU, enabling consistent adherence to and implementation of program requirements. For all projects, DCSEU will review a proposed scope of work (to be approved by DOEE), communicate that proposed scope of work to the customer and the contractor via an agreement that the customer and contractor must acknowledge and sign, conduct a quality assurance/quality control inspection to confirm installation of the approved and rebate-funded measures, and confirm successful completion of a Department of Buildings (DOB) inspection, if applicable. If DCSEU determines that a proposed scope of work initially fails to meet DOE's and DOEE's program requirements, DCSEU will require that scope of work to be updated to comply with the requirements. DCSEU will not issue a go-ahead to commence work or issue a rebate unless the scope of work is verified. DOEE reserves the right to conduct periodic program audits, including desk reviews and project walkthroughs.

All properties enrolled in AHRA are required to annually track their energy and water efficiency and report the results to DOEE for public disclosure. Address information is included in these reports and verified by DOEE. Furthermore, each property receiving a HER rebate will already have had an ASHRAE Standard 211-2018 Level 2 energy audit conducted by a pre-qualified DCSEU subcontractor. These auditors are required to conduct site visits to conduct these audits and report the address information in the resulting audit report. For HER/AHRA, DCSEU also requires each customer to complete a customer intake form to identify the property owner and to inform the customer that the customer agreement, which includes the scope of work, must be signed by the property owner. Information from the customer intake form is compared against public databases - such as DC Scout, the Office Of Tax Revenue's real property database, or DC Corp Online - to verify the property owner and that the property owner is a valid legal entity. If any discrepancies are identified, the DCSEU will work directly with the property contact to resolve the issue. DOEE or DCSEU will request that the building owner update their information in ENERGY STAR Portfolio Manager or otherwise provide the correct information to DOEE. Additionally, if the address on the installation does not match the address on the rebate reservation, DCSEU will attempt to determine the correct address by reaching out the applicant/property owner and/or contractor, providing up to 3 days to submit the correct address so that DCSEU can remediate the relevant documentation.

Validation of Correct Rebate Amount

DOEE will deliver a rebates program that exclusively serves multifamily housing buildings where at least 50% of units occupied at the time of income verification contain households at less than 80% area median income (AMI). Thus, proof of income will be required for each rebate issued. DCSEU will not reserve a rebate amount or approve a scope of work until income is verified. Acceptable documentation and methods for income verification can be found in Appendix B of this plan.

Additionally, successful completion of inspections will be required for a rebate to be issued. DCSEU will verify that the rebate amount is correct using information from quality assurance/quality control (QA/QC) inspections and DOB inspections, if applicable. During the post-installation inspection, the QA/QC inspector assigned to the project will verify and document that measures have been installed and are operational, unless seasonality prevents verifying operation, such as when local prohibitions apply on operating (or ceasing operation of) heating and cooling equipment during certain times of the year. The QA/QC inspector will also verify that the equipment installed matches the details and quantities in the scope of work. In cases where a large volume of a particular measure has been installed, the inspector may estimate the total quantity based on a sample size of a hallway or unit type. If an inspection indicates that the equipment installed differs from the details and/or quantities agreed upon in the scope of work, DCSEU will adjust the rebate amount accordingly. DCSEU will not provide rebates in excess of what is reflected in the scope of work unless approved by DCSEU and DOEE on a case-by-case basis and authorized via an amendment to the agreement.

Post-Installation Inspection Certificate

Buildings that participate in the Affordable Housing Retrofit Accelerator and successfully complete a post-installation QA/QC inspection will receive a certificate that indicates the modeled energy savings, that the project was funded using a Home Efficiency Rebate, and that the property participated in the Affordable Housing Retrofit Accelerator. DCSEU will confirm that the certificate was provided and will also maintain a copy of that certificate.

Data Retention

DCSEU will retain documentation of all project data that is required as part of the Data & Tools Requirements Guide, including post-installation photos confirming the brand and model of installed equipment (where visible), DOB and QA/QC inspection forms and notes, and proof of commissioning testing on heat pump appliances. Where applicable, the DCSEU will retain documentation that gas equipment was decommissioned, and that proper capping of gas lines was completed. Under its contract with DOEE, DCSEU is required to retain records for a period of 3 years after expiration, termination, or completion of its contract with DOEE.

QA/QC inspections will be required for all projects. DCSEU or DOEE may additionally sample a small percentage of completed projects to further verify adequate installation and conformance to data collection and other requirements.

DCSEU staff will conduct data/file reviews; DOEE staff may also conduct such reviews. Qualifications for those staff include: a bachelor's degree and demonstrated experience with data analytics and/or with home energy audits and energy efficiency projects.

Onsite Inspection

Requirement that All Projects be Inspected

All rebate-funded projects will be centrally coordinated through DCSEU, enabling consistent adherence to and implementation of program requirements. Thus, all rebate-funded projects will include an onsite post-install QA/QC inspection conducted by DCSEU or a qualified and independent DCSEU subcontractor, along with a DOB inspection when required, exceeding DOE's requirement that 5% of each contractor's projects undergo independent onsite post-install inspection. Inspections will not be completed by the same entity completing installation; however, participating contractors must adhere to the QA/QC process to be added to and remain on the qualified contractors list. Additionally, DCSEU will require independent post-install inspections for the first five projects of all contractors who are new to or newly certified in the industry.

Inspection Protocol

DCSEU will follow the following protocol for inspections of multifamily housing participating in AHRA:

- A post-upgrade onsite inspection will be conducted for all projects. In rare cases where access to a building is limited, DCSEU will request thorough documentation, which may include photos, videos, written reports, building owner/tenant narratives or any other supporting documentation, to demonstrate that measures were installed correctly.
- Within each project, DCSEU engineers inspect a percentage of the total dwelling units, in adherence with ASHRAE 211. Within those units, they inspect all measures outlined in the project scope of work.
- During the inspection, DCSEU engineers perform a visual check and will take geocoded photos/videos of the installed equipment. Some examples of photos taken are:
 - Closeup of the new equipment with model numbers and nameplate information.
 - Wide shot of equipment operating under expected conditions.
 - For controls type measures, photos of the expected setpoints as agreed upon during the analysis (e.g., photos of setpoints on a thermostat or building automation system, or screenshots from an online portal).
- DCSEU staff also perform a desk review for every project, which includes review of all material invoices to ensure the installed equipment model number and nameplate information matches the material invoices and the project scope of work.
- DCSEU will review and verify post-installation inspection and diagnostic test results and retain the necessary documentation.

- Where applicable, projects that require decommissioning of gas equipment and capping of gas lines must pass a DOB inspection. After DOB inspection, where applicable, the DCSEU or its third-party subcontractor will confirm that gas equipment was properly decommissioned, and that proper capping of gas lines was completed. DCSEU or the third-party subcontractor will be required to report those results for review and if found to be inadequate, the installation must be remedied before rebate funds are issued.
- DCSEU requests copies of all DOB permits that may be required to install new equipment such as heat pumps.
- If the inspection identifies items that need to be remedied, then the original contractor will be responsible for the repair, and an inspection of the remediated measures will be repeated within 10 business days after completion of the installation, except as described below.
 - Conflict resolution protocols will be followed if a dispute arises around whether remediation is necessary or falls within the contractor's responsibility.
 - Local landlord-tenant notification laws or other access protocols could impact the timeframe if a contractor needs access to the property or a unit to complete the remediation.

DCSEU digitally saves all documents, including inspection forms, photos, videos, material invoices and DOB permits, on a per-project basis. At this time, virtual inspections will not be part of the program.

Training, Credentials, and Qualifications for Independent Inspectors

See the Qualified Contractors section for additional information on the contractor qualifications, including requirements for independent inspectors. Final payment (via rebate) to the contractor/installer will be withheld until a project passes a QA/QC inspection. If QA/QC inspection failure rates exceed 10% over a six-month period, DCSEU will reevaluate whether the contractor/installer continues to meet the qualifications required to remain on the qualified contractor list.

Customer Agreements

DCSEU uses DocuSign, which is E-sign compliant, for all agreements and will additionally provide a copy to the customer. DCSEU will utilize DOEE's interpreter services or work with a vendor as needed to provide translation and interpretation services.

All customer agreements will initially be made available in English. If a customer requests that an agreement be translated, DCSEU will first consult with an attorney with expertise in translating contracts. DCSEU will request questions and comments in writing from the customer and provide a written translated response through an attorney. If requested by a customer, DCSEU can also facilitate a meeting with the customer, DCSEU program staff, and its translation and interpretation vendor to translate responses directly to the customer.

Qualified Contractors

Developing and Using the Qualified Contractors List

DCSEU will maintain the qualified contractors list publicly on its website. Consumers interested in participating in the program and benefitting from rebates must apply directly with DCSEU, which will assign qualified contractors/installers to projects based on availability and suitability. Rebates will not be available outside of participation in AHRA. DCSEU will recruit service providers in several areas, including energy auditing, measure installation (i.e., contractors and installers), and performance testing.

New service providers will be solicited and qualified through an open Request for Qualifications (RFQ) that is posted on [DCSEU's website](#). To ensure availability of qualified contractors at program launch, the qualified contractor list will also include contractors that DCSEU has previously enrolled for AHRA through the same RFQ process and subject to the same contractor qualifications described below. While a new RFQ will be issued at the beginning of each fiscal year² to reflect program changes, if any, applications will be accepted on a rolling basis.

Upon receiving a response to the RFQ, DCSEU will assemble a team of at least three reviewers to independently review and score the proposal according to the evaluation criteria posted in the RFQ on [DCSEU's website](#) (excluding references to locational preference). DCSEU will confirm that the service provider meets the requirements in the Contractor Qualifications section below and perform due diligence (for example, by cross-checking applicants with available public records) to prevent the listing of unqualified individuals or entities. This could include but is not limited to cross-verification of business name and ownership with the following:

- DC CorpOnline
- DC Scout database (business licensing)
- Federal debarment list on sam.gov

After an independent scoring round, the reviewers will meet as a group to discuss the strengths and weaknesses of each proposal and calculate an average score. If the average score exceeds the minimum score requirements, the service provider will be added to the qualified contractors list and issued a DCSEU subcontract with a starting not to exceed (NTE) amount against which work orders for specific projects can be issued.

Contractors in good standing at the end of a fiscal year will not be required to respond to newly issued RFQs. To remain on the qualified contractor list, contractors are expected to adhere to minimum insurance requirements, maintain licenses required to perform services under the program as described in the Contractor Qualifications section, and continually demonstrate customer service. The minimum insurance requirements are determined by the DCSEU in consultation with the DC Office of Risk Management based on the scope of work. This currently includes commercial general liability insurance, automobile liability insurance,

² The District of Columbia's fiscal year begins October 1 each year.

workers' compensation insurance, employer's liability insurance, crime insurance, cyber liability insurance, professional liability insurance, sexual/physical abuse and molestation insurance, and umbrella or excess liability insurance.

DOEE plans to use the Training for Residential Energy Contractors (TREC) grant to upskill contractors and installers via DCSEU's Train Green program (for additional information, see the Community Benefits Plan). Once TREC funds are awarded by DOE and deployed by DOEE, DCSEU will update the process and/or scoring criteria to review and consider contractors and installers trained using TREC funds.

Delisting Contractors

The qualified contractor list will be reviewed annually at a minimum, but service providers may be listed or delisted on a rolling basis. Service providers who no longer meet the minimum requirements and standards will be delisted. This includes but is not limited to service providers that: have not come into compliance with the conditions to lift a temporary suspension within a reasonable period (see Resolution Procedures section); have engaged in use or employment of dishonesty, fraud, deception, misrepresentation, false promise, or false pretense; have engaged in gross negligence that posed a significant risk to human health or safety; have acted in a negligent manner that poses a significant risk to the program; or otherwise demonstrate an unwillingness or inability to substantially comply with program requirements or ensure safe and effective project work.

DCSEU will notify contractors of the proposed action to delist. Contractors will have an opportunity to appeal within 20 business days and demonstrate evidence of adherence to program requirements, which will be reviewed by DCSEU, and DOEE if escalated.

Contractor Qualifications

The qualifications described below represent the initial qualifications required to participate in the program in its first year (October 2024 through September 2025). These qualifications will be reviewed annually and may be updated. For the most up-to-date contractor qualifications and RFQ evaluation criteria, please visit [DCSEU's website](#). The DCSEU will collect and retain copies of the relevant business licenses and certificates of insurance.

Insurance, Labor Standards, and Other Requirements for All Contractors

All contractors must meet the minimum insurance requirements, which are determined by the DCSEU in consultation with the DC Office of Risk Management based on the scope of work. This currently includes commercial general liability insurance (\$1 million per occurrence/\$2 million aggregate), automobile liability insurance (\$1 million), workers' compensation insurance (based on statutory mandates), employer's liability insurance (\$500,000 per accident/\$500,000 employee disease/\$500,000 policy disease), crime insurance (\$1 million), cyber liability insurance (\$2 million per occurrence/\$2 million aggregate), professional liability insurance (\$1 million), sexual/physical abuse and molestation insurance (\$1 million per occurrence/\$2 million aggregate), and umbrella or excess liability insurance (ranges between \$1 million and \$3 million depending on subcontract size).

Energy Auditors

Service providers interested in qualifying for AHRA energy audit services will be required to meet the following qualifications:

1. Must possess at least one of the following active certifications or licenses:
 - MFBA from Building Performance Institute (BPI) for Multi-Family property types
 - CEM Certified Energy Manager (Association of Energy Engineers (AEE) Certification)
 - CEA (AEE Certification)
 - BEAP from ASHRAE
 - HBDP from ASHRAE
 - Professional Engineer (PE)
 - Additional relevant ASHRAE, BPI, or RESNET certifications may be submitted for DCSEU consideration but will require DCSEU pre-approval in writing, prior to acceptance.
2. Provide highly qualified supervision and sufficient personnel to complete the performance testing services promptly.
3. Ensure all services conform to the standard of care and practice appropriate for the nature of the services, including but not limited to, industry best practices and the requirements set forth below.
4. Ensure all services are performed in compliance with applicable laws, statutes, ordinances, rules, regulations, and orders enacted by or promulgated by federal, state, municipal, or other governmental authorities including but not limited to procuring all necessary permits, licenses, concurrences, other governmental approvals necessary to complete the work.

Implementation Services (Contractors/Installers)

Service providers interested in qualifying for AHRA Implementation Services will be required to meet the following qualifications:

1. Able to install a wide range of energy efficiency measures in affordable multifamily residential buildings in the District of Columbia per DCSEU Program protocols. All energy efficiency measures are subject to DCSEU and DOEE approval. Service Providers will be required to submit "as built" documentation using forms provided by the DCSEU.
2. Provides highly qualified supervision and sufficient personnel to complete the installation services promptly.
3. Conforms all services and equipment to the standard of care and practice appropriate for the services, including the manufacturer's recommendations, installation instructions, industry best practices.
4. Ensures all services and equipment are free from material defects, errors, and omissions.
5. Completes all installations in compliance with applicable laws, statutes, ordinances, rules, regulations, and orders enacted by or promulgated by federal, state, municipal, or other governmental authorities including but not limited to procuring all necessary

permits, licenses, concurrences, other governmental approvals necessary to complete the installation.

6. Must receive a minimum score of 55 points under the RFQ.

District regulations require that refrigeration and air conditioning contractors as well as electrical contractors must meet certain requirements, such as having a Master HVAC Mechanic on staff, to be licensed as an HVAC business and to perform this work in the District.

Qualified contractors will be required to comply with all applicable licensing and permitting requirements for individual projects. This includes compliance with the District of Columbia Building Code, which requires that anyone undertaking work pursuant to a permit must possess a valid and appropriate business license, professional license, and/or trade license in the District of Columbia, pursuant to DC Official Code section 47-2853.01, *et seq.*, and Titles 16 and 17 DCMR, as applicable. The District of Columbia Building Code sets forth the specific qualifications (such as master or journeyman trade licenses) required for each type of permitted work.

To perform weatherization, insulation, or air sealing work, qualified contractors (or a member of their staff) must maintain one of the following certifications:

- BPI Building Analyst Professional
- BPI Envelope Professional
- BPI Retrofit Installer Technician

The DCSEU may allow additional comparable certifications in consultation with DOEE

Performance Testing Services (Inspectors)

Service providers interested in qualifying for AHRA Performance Testing Services will be required to meet the following qualifications:

1. Must possess at least one of the certifications listed in the DOEE Building Energy Performance Standards Guidebook Section 3.3.4.1 (e.g., BPI Certified Building Analyst for Multifamily Buildings or HERS Energy Rater). Comparable certifications may be submitted to the DCSEU for consideration and approval.
2. Must provide at least one (1) work product example demonstrating proficiency in providing the services set forth directly above. The DCSEU reserves the sole discretion to review, evaluate and make the final determination as to whether the work product provided by Service Provider demonstrates proficiency in the requested services.
3. Must receive a minimum score of 55 points under the RFQ.
4. Provide highly qualified supervision and sufficient personnel to complete the performance testing services promptly.
5. Ensure all services conform to the standard of care and practice appropriate for the nature of the services, including but not limited to, industry best practices and the requirements set forth below.
6. Ensure all services are performed in compliance with applicable laws, statutes, ordinances, rules, regulations, and orders enacted by or promulgated by federal, state, municipal, or other governmental authorities including but not limited to

procuring all necessary permits, licenses, concurrences, other governmental approvals necessary to complete the installation.

Other HER Requirements

The District will implement a HER program based on modeled energy savings only. DOEE's objectives are to maximize energy savings and greenhouse gas (GHG) reductions by:

- Targeting inefficient or poor energy-performing buildings, which can be identified using benchmarking and other data maintained by DOEE;
- Encouraging envelope and other EEMs to be identified and presented for consideration; and
- Prioritizing electrification and the removal of all fossil fuel-burning appliances within each property.

Under AHRA, DOEE and DCSEU will be involved in reviewing energy audits and recommending measures to building owners. DOEE and DCSEU will continue to engage building owners to educate them about building energy performance and efficiency measures, prioritizing investments in envelope improvements where feasible by explaining potential benefits, such as utility bill savings.

Information on allowable methods for auditing a building's energy use and measuring energy savings can be found in the Data Review section.

Installation

Quality Assurance and Quality Control

Projects will be centrally coordinated through DCSEU, enabling consistent implementation and adherence to program requirements. For all projects, DCSEU will review and approve a proposed scope of work using standardized procedures; communicate that proposed scope of work to the customer via an agreement that the customer must acknowledge and sign; conduct a quality assurance/quality control inspection to confirm installation of the approved and rebate-funded measures as indicated in the agreement signed by DCSEU, the customer, and the contractor/installer; and confirm successful completion of a DOB inspection, if applicable. Installation standards will be specified in the subcontracts that DCSEU executes with contractors/installers that are on the qualified contractors list. All equipment must be ENERGY STAR; Air-Conditioning, Heating, and Refrigeration Institute (AHRI); DesignLights Consortium (DLC); or Northwest Energy Efficiency Alliance (NEEA) certified unless otherwise specified by the audit. Contractors installing HER-funded measures must agree to:

- Conform all services and install all equipment with the standard of care and practice appropriate to the nature of the services, including but not limited to, the manufacturer's recommendations, installation instructions, industry best practices, professional standards (e.g., repainting walls for fixture replacements, if necessary), and to ensure all services are free from material defects, errors, and omissions.

Comply with all applicable laws, statutes, ordinances, rules, regulations, and orders enacted by or promulgated by federal, state, municipal, or other governmental authorities including

but not limited to procuring all necessary permits, licenses, concurrences, and other governmental approvals necessary to complete the DCSEU approved scope of work. Under AHRA, contractors will be required to submit the following documents to the DCSEU to evidence completion of the scope of work:

- All permits, approvals, and/or consents necessary to lawfully complete the scope of work (e.g. a DOB structural and/or electrical permit(s) and any other permits or approvals required, such as historic, zoning, or electric utility);
- A copy of the invoice for the installation of the measures listed in the scope of work and proof of payment. All items installed must be new, never used, and with factory warranties intact. Additional information on invoice requirements can be found in DOEE's HER application.

Contractors shall contact the DCSEU within five (5) business days of completion of a scope of work to schedule a QA/QC inspection. The QA/QC inspection shall be performed by the DCSEU or its authorized representative to verify and document completion of the scope of work. If the inspector is unable to verify operational status because of seasonality constraints (e.g., if the equipment cannot be operated because the QA/QC inspection takes place during a time period in which District law precludes the equipment from operating, such as heating equipment in the summer or cooling in the winter), then only installation is verified.

- Energy Efficiency Measures (EEMs): The DCSEU will conduct a detailed QA/QC inspection to verify and document the EEMs have been installed and are operational.
- Seasonal Energy Efficiency Measures (SEEMs): The DCSEU will conduct a detailed QA/QC inspection to verify and document that the SEEMs have been installed. Operational status of SEEMs is not able to be determined at the time of inspection, typically because local regulations prohibit the operation/cessation of certain equipment during defined periods of the year.

Because of the seasonality issue related to SEEMs, the customer and the contractor both agree to:

- Commission the SEEMs, when appropriate
- Remediate any issues affecting the performance or efficiency of the SEEMs, including any costs, if applicable, and
- Provide the DCSEU and/or DOEE reasonable access to the facility to conduct a QA/QC inspection of the SEEMs after commissioning, if requested.

If the project passes the QA/QC inspection, the DCSEU or its authorized representative signs the inspection form and sends it to the customer to sign, then provides the fully executed inspection form to DCSEU for review and filing. In the event the required documentation fails to meet DCSEU's requirements and/or the work does not pass inspection, the DCSEU will promptly notify the contractor/installer and the customer. The contractor/installer will have up to 14 calendar days to resubmit the required documentation and/or undergo and successfully pass a second QA/QC inspection. Installations that fail to pass inspection (and thus fail to meet the communicated standards) must be remediated at no cost to the customer or to the District.

Customer Protections

Under AHRA, DCSEU will confirm that sales language and contract language are the same for measures funded using the rebates. If DOEE decides to incorporate financing options into the program design, DCSEU will notify customers and/or contractors that if they take advantage of financing from the DC Green Bank (DCGB), the District's green financing authority, they are entitled to:

- An ability to repay determination that does not include projected savings from an energy report because expected savings may not materialize due to household and market developments.
- Clear, written advance disclosures with a 7-day waiting period between the disclosure and contract signing. This waiting period should only be removed in a personal emergency where the customer, in their own handwriting, describes the emergency and the need for the emergency work and their understanding that they are waiving the waiting period.
- In non-emergency circumstances, a 3-day right to cancel after an agreement has been signed (assuming no work was completed during that period).

If financing options are incorporated into the program, DOEE will execute an agreement requiring DCGB to provide the 7-day waiting period and abide by and alert customers to the 3-day right to cancel for rebates-funded projects.

Continuous Improvement

Reducing Fraud, Waste, Abuse, and Unfair Business Practices

During the application and intake process, DCSEU staff will verify that the project address has not been recently serviced with the same measures through a different DCSEU program offering. DCSEU will also coordinate initial walkthroughs of applicants' properties, creating an opportunity to flag duplicate applications for assistance. Additionally, DCSEU will conduct income verification before a scope of work is approved and closely review contractor invoices and other documentation before a rebate is issued (see Installation section and DOEE's HER application), minimizing risk of a rebate being issued for a duplicate project. DCSEU will also confirm ownership of the property using public databases such as DC Scout and the Office of Tax and Revenue's real property tax database.

Proof of income is required to verify income eligibility. For information on the District's proof of income and income verification requirements, see DOEE's HER application. To reduce the risk of fraudulent rebate claims, DOEE and DCSEU will not accept self-attestations of income level, except for proof of no income. All self-attestations of categorical eligibility in approved programs and of no income will be verified using District-maintained databases of approved programs.

For information on minimizing contractor fraud and abuse, see the Resolution Procedures and Qualified Contractors sections.

In case of suspected fraud, waste, or abuse:

- DCSEU will immediately report the case to DOEE and provide the pertinent information.
- DOEE staff will determine whether the matter should be investigated further and/or referred to the Office of the Attorney General for the District of Columbia.
- Where it is determined by the Office of the Attorney General for the District of Columbia or by another government agency that an entity knowingly engaged in fraud, waste, or abuse, that entity will be prohibited from participation in DOEE and DCSEU programs.
- DOEE and DCSEU will review the case to identify opportunities for continuous improvement.

Improving Program Function

Under AHRA, DCSEU will implement an internal measurement and verification process to help ensure installed measures are achieving accepted energy savings realization rates.

DCSEU will analyze a random sample of projects to:

- Ensure that the energy savings claimed are based on accurate and reliable data.
- Utilize transparent and defensible methods to build trust in the reported savings.
- Uncover deficiencies in tracking tools, calculation methods, and technical reference manuals.
- Resolve issues before the savings verification stage, thereby minimizing the risk of adjustments to the realization rate.

DCSEU's internal database and customer relationship manager, Tracker, has various features to ensure data is entered and tracked appropriately. The DCSEU will utilize automation in several areas to identify and address program performance issues, for example:

- Programming discrete tasks, milestones, and timelines to ensure project process and progression occur in the correct sequence and to create automated prompting for overdue milestones
- Implementing tools to support supplemental reporting to identify problem areas for task timelines and inform where program performance is at risk (e.g., reported failed inspections)
- Implementing application user interfaces to identify missing data prior to submission to DOE or DOEE

These actions will allow the DCSEU to monitor the program, relay programmatic information to DOEE, and make adjustments throughout the year on both individual projects and across the program. DOEE conducts ongoing monitoring of DCSEU's finances and performance under the [contract](#).

As part of DOEE's demonstrated commitment to continuous improvement throughout the program lifecycle, DOEE will also take the following steps to ensure quality assurance and continued program function:

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- Continuously review survey responses, customer complaints, results of conflict resolution, results of initial inspections, and public and consumer feedback reported to DOEE and DCSEU through public/stakeholder events, phone, email, and other mechanisms and address emerging issues; reported instances of suspected fraud, waste, or abuse; and patterns of negative feedback
- Meet weekly with the program implementer, DCSEU, to:
 - Monitor the progress of individual AHRA projects, informed by data
 - Troubleshoot specific or systemic issues, using information on the frequency of errors
 - Discuss and implement program improvements
- Track DCSEU expenditures monthly and troubleshoot if program uptake or rebate issuance is slower than expected
- Conduct periodic internal program audits and evaluations – potentially including but not limited to reviewing a sample of QA/QC inspections or contractor invoices - and identify and implement courses of action to address deficiencies
- Review and make available on its website progress towards goals in the Community Benefits Plan
- Review the Consumer Protection Plan at least every two years; modify the plan based on lessons learned and feedback provided; communicate changes to DOE, contractors, and other stakeholders; and provide DOE with information regarding monitoring, review, and revision of the plan based on program performance every two years or upon DOE request
- Review DCSEU performance by commissioning an independent third party to complete an [evaluation, measurement, and verification report](#) as required by District law
- Provide announcements on DCSEU and DOEE program websites to keep the public informed about program developments, success stories, and upcoming changes
- DOEE will explore additional functions that can be automated and analyze potential actions toward efficient and effective program deployment

Program improvements may be proposed on an ongoing basis based on findings from any of the items described above. DOEE will evaluate proposed program improvements based on the risk to the program of no action, feasibility of implementation (including costs), and the expected level of improvement. If DOEE moves forward with a program improvement, where applicable, DCSEU and other subrecipients will be required to acknowledge, evaluate, and provide a status on applicable improvement items during regular check-ins.

Additionally, DOEE staff, led by the IRA Rebates Program Manager, will be responsible for continuously tracking and monitoring the program's budget and financial oversight and performance to ensure funds are being used efficiently and effectively. Other DOEE staff funded under HER will provide support to the program, including the Technical Analyst, who will serve as the technical lead on audits, models, and measured savings, and the IRA Rebates Program Analyst, who will support program implementation and oversight. Metrics for effective spending may include dollars spent per measure or unit, utility savings, or greenhouse gas reductions. DCSEU will report financial data monthly to DOEE, which will

provide quarterly reports to DOE. DOEE will provide notice on its website if it anticipates that rebates funds will be exhausted in the coming year.

Consumer Protections for Renters

Rental Affordability

Protections for Low-Income Rental Tenants and Housing Affordability

Because owners of low-income rental housing can only receive rebate-funded assistance on the basis of renting to low-income households, they must maintain affordability of dwelling units by complying with the following requirements for an affordability period following the receipt of a rebate. A low-income household is defined as one where the total gross income earned is less than 80% area median income. The duration of the affordability period will be no less than two (2) years and no greater than ten (10) years, with length of the period commensurate with the total rebate amount provided.

- The owner agrees to rent at least 50% of dwelling units to low-income households for the duration of the affordability period.
- The owner agrees not to evict a tenant to obtain higher rent tenants based upon the improvements.
- The owner agrees not to increase the rent of any tenant of the building as a result of the energy improvements with the exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.
- The owner agrees that if the property is sold within the affordability period, the aforementioned conditions apply to the new owner and must be part of the purchase agreement.

These protections will be available on the program websites. Templates will be available to low-income rental property owners/managers to notify tenants of these protections before upgrades commence via email or hard copy notice to each tenant. Property owners will agree to these conditions as part of the agreement executed to participate in the program and benefit from rebates. Property owners/managers must additionally notify tenants of continued rental affordability alongside notices of rent changes and via an addendum to the lease at the time of initial signing or renewal. Tenants may contact DOEE staff if they suspect a building owner/property manager is in breach of the agreement; contact information will be made available on the template provided.

If a building owner defaults on the agreement, the District may institute legal proceedings to compel performance of the owner's obligations under the agreement, demand repayment of all incentives, disqualify a building owner from future DCSEU and DOEE funding opportunities, and/or require the owner to repay tenants for any increase in rent that was charged in violation of the agreement.

Demonstrating Compliance with Low-Income Housing Affordability Protection Requirements

The owner will demonstrate compliance with these low-income housing protection requirements by submitting the following:

- During program intake:
 - Signed affordability cover sheet and along with required supporting documentation, such as:
 - Documentation of an existing affordability covenant that extends for at least the same duration of the required affordability period, OR
 - Affordability agreement executed by property owner or manager
 - Executed incentive (or rebate) agreement with relevant affordability terms and conditions
- Following receipt of program assistance: For the duration of the affordability period, annual submission of evidence of compliance in accordance with the terms of the incentive agreement. For dwellings qualifying for rebates based on categorical eligibility, DOEE will rely on pre-existing monitoring being carried out by the relevant entity, such as DC's Department of Housing and Community Development (DHCD)³. For dwellings qualifying based on individual household income verification, DOEE will aim to emulate DHCD's monitoring procedures, such as annual reporting an attestation of compliance with the low-income tenant protections and periodic auditing and/or re-certification of household income(s), commensurate with the duration of the affordability period.

All documentation may be provided and/or received by either the DCSEU or DOEE. For an affordability agreement executed by and between DOEE and the building owner, enforcement shall be the responsibility of DOEE.

Opportunities for Feedback from Rental Tenants

DOEE wants to ensure that renters living in program-participating multifamily housing properties have opportunities to provide feedback or share complaints. To that end, renters can provide feedback using any of the methods described in Filing Complaints, Concerns, and Issues section.⁴ As part of the terms and conditions of program participation, DCSEU will require building owners/property managers to provide the following documents (via email or hard copy notice to each tenant) before upgrades commence:

- One-pager with notice of work to be conducted, basic program information, and DOEE and DCSEU website and contact information as described in the Filing Complaints, Concerns, and Issues section for questions related to program participation
- Rental affordability rights document with DOEE contact information

³ <https://dhcd.dc.gov/service/project-monitoring>

⁴ The DCSEU will not mediate tenant-landlord disputes.

- Notice of potential utility bill impacts, if individual units are responsible for paying the utility bill

DOEE and DCSEU will prepare templates of the above documents. DOEE and DCSEU will also develop a plan to deploy a renter-specific survey to solicit feedback.

As described in the Community Benefits Plan, DOEE will also bring on a grantee to specifically engage with tenants of a sample of AHRA-participating buildings. Pre-retrofit engagement will prepare residents for the pending upgrades and provide them with a mechanism for sharing feedback, while post-retrofit engagement will train residents on how to use and maintain new equipment (if applicable) and provide an opportunity for residents to discuss building and utility bill changes with program implementers, all of which will be integrated into continuous improvement. Additional information on tenant and household education, outreach, and engagement activities can be found in the Education and Outreach Plan and the Community Benefits Plan.

Appendix A: Consumer Satisfaction Survey

DCSEU will send a survey to AHRA-participating building owners and property managers three (3) months after program completion. At a minimum, the survey will include the following questions, along with space to provide general or open-ended feedback.

Scale: Strongly Disagree = 1, Strongly Agree = 5, (include "Don't Know" and "Not Applicable")

1. It was easy to understand the rebate requirements and provide the needed information
2. It was easy to find a contractor
3. The contractor provided a high-quality of service
4. The rebate was a major reason for my purchase
5. My new efficiency upgrades perform well
6. My home is more comfortable than it was before the new efficiency upgrades
7. My energy bills are lower since the new efficiency upgrades
8. Overall, I am satisfied with my experience with the HEAR program
9. I would recommend this program to a friend or family member who could use it
10. I plan to do more to save energy in my home because of my experience with this program

Appendix B: Income Qualification and Verification

DOEE will deliver a program that exclusively serves multifamily buildings that meet low-income requirements. Income qualification methods are described below; however, for the most current information on how to income qualify, please visit DCSEU's website:

<https://www.dcseu.com/affordable-housing-retrofit-accelerator>.

Income Qualification at the Whole-Building Level

Building owners can attest to or provide documentation of participation (at the time of application) in the following programs to demonstrate whole-building eligibility:

- Public Housing (housing owned and operated by the DC Housing Authority)
- 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 (e.g., Section 8)
- Section 42 Low Income Housing Tax Credit (LIHTC)
- Weatherization Assistance Program (WAP)
 - For WAP, proof of participation can be within the two (2) years prior to HEAR income verification
- Privately-owned multifamily buildings with deed covenants (“Affordable Housing Covenant”) and/or land disposition agreements that restrict at least 50% of dwelling units as Affordable Dwelling Units (ADUs) to be occupied by households whose incomes do not exceed 80% AMI. These restrictions may or may not include Inclusionary Units (D.C. Official Code §6-1041)

Submitted documentation will be verified using information maintained by DCSEU and/or information maintained by District agencies such as DOEE, DHCD, and the District’s Office of Tax and Revenue.

If a multifamily building owner or property manager cannot attest to or demonstrate participation in an approved whole-building program, they may income qualify by demonstrating, through submission of acceptable household-level income documentation described in the Income Qualification at the Household Level section, that at least 50% of dwelling units occupied at the time of income verification consist of income-qualifying households.

Buildings may use a combination of methods to income qualify. For example, if documentation is provided that demonstrates that less than 50% of occupied units are classified as ADUs under an Affordable Housing Covenant, then the building owner/property manager can directly obtain or work with DCSEU to obtain documentation from tenants of any remaining occupied units until the 50% low-income dwelling units requirement is met.

Income Qualification at the Household Level

Household income will be defined as the sum of the gross income of all members of a household at the time income information is submitted. A household is defined as one or more individuals who live together. For categorical eligibility purposes, households must demonstrate proof of enrollment in an approved program within the fiscal year (October 1 to September 30) that is current at the time the information is submitted, with exceptions specifically noted below.

For households providing documentation of income, DCSEU will accept multiple forms of proof of income and will review the provided documentation to verify its authenticity.

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Mirroring income verification methods from existing utility assistance and energy efficiency programs implemented by DCSEU, the following will serve as acceptable documentation of income for households:

- Proof of gross income or wages through the most recently issued paystub, tax document (most recent 1099, including 1099MISC, 1099G, 1099R, 1099A, 1099SSA, 1099DIV, 1099SS, 1099-INT), and/or bank statement
- Proof of self-employment income through most recently issued 1040 SE with Schedule C ledger documentation
- Proof of unemployment insurance through most recently issued letter demonstrating approved status for unemployment benefits
- Retirement/pension benefits through most recently issued letter or statement from the Social Security Administration and/or most recently issued bank statement
- One-time lump-sum payments, such as winnings from lotteries, etc. evidenced through letters or bank statement(s) demonstrating lump-sum payment
- Income from employment through Workforce Investment Act (WIA) through most recently issued bank statement
- Rental income through most recently issued bank statement and copy of active lease
- Alimony through most recently issued bank statement
- Child support through most recently issued bank statement

To confirm household size, all proof of income must be accompanied by a form of identification for all residents of the household, such as a photo ID and social security card.

DOEE will also accept documentation demonstrating enrollment in a program approved for categorical eligibility. The following programs are approved for categorical eligibility at the household level:

- Low Income Home Energy Assistance Program (LIHEAP)
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- The District's [Solar for All program](#), for households up to four (4) individuals
 - For Solar for All, proof of participation can be within the three (3) years prior to HEAR income verification
- The District's [Utility Discount Programs](#) (UDP), including Residential Aid Discount, Residential Essential Services, and Customer Assistance Program
- The District's [Clean Rivers Impervious Area Charge](#) (CRIAC) residential relief customer assistance program I (CAP1) and customer assistance program II (CAP2)
- The District's [Lead Reduction Program](#)

For households providing documentation of enrollment in a program approved for categorical eligibility, DCSEU will review the provided documentation to verify its authenticity. Additionally, DOEE may cross-check these documents with information maintained in enrollment databases of the applicable programs.

At program launch, DOEE is obtaining access to the necessary databases to allow other income verification methods, including self-attestation of enrollment in a categorically

eligible program and self-attestation of no income. **DCSEU will update its website when households can income verify using these alternative methods.** Self-attestation of income will not be accepted for income qualification purposes, except for proof of no income. DOEE will verify self-attestations of no income by cross-checking the household's information across District-maintained databases of assistance programs to confirm that the household is not receiving income from those programs at the time of income qualification or has not submitted conflicting income information to those programs. For households self-attesting to enrollment in a program approved for categorical eligibility, DCSEU will review the self-attestation and the District will cross-check self-attestations with information maintained in enrollment databases of the applicable programs.