



Frequently Asked Questions

Home Energy Rebates Program

Home Owner Managing Energy Savings (IRA Section 50121) and High-Efficiency Electric Home Rebates (IRA Section 50122)

Updated September 2026

Instructions

Grantees are encouraged to check all available documentation (including but not limited to the most recent Program Requirements & Application Instructions (PRAI) (version 2.1 published December 2024), Program Notices (published May 2026), Data & Tools Requirements Guide (version 2.0 published January 2025), Administrative and Legal Requirements Document (ALRD) (version 2.1 published December 2024), and this document) and discuss with peer states and NASEO before contacting their Project Officer. If the question is truly unique or state-specific, please highlight the element of the question that is new when presenting it to your Project Officer. DOE plans to share new frequently asked questions and answers on a monthly or quarterly basis moving forward.

This document is organized to align with the Program Requirements & Application Instructions sections. As new questions are added, DOE plans to retain the current structure and add new questions with unique question identifiers (e.g., 1.0#A). New questions and revisions are highlighted in **purple**. Please note this FAQ document is limited to state and territory programs. A separate FAQ document will be provided to Tribes.

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PRAI Section 1.0 Overview

- A. [HOMES] [HEEHR] Do states need to pause launched programs to comply with the new program guidance? If states continued to reserve rebates based on their previously approved program during the three-month period for revisions, will they be able to pay those rebates after the three-month period because they were reserved prior to the August 31, 2026, deadline?**

States with launched programs should continue to issue rebates. As stated in Section 3 of [Program Notice 26-1](#) and [Program Notice 26-2](#), launched programs are required to make changes within three months of the publication of the Program Notices unless there are extenuating circumstances that require DOE approval beyond this time period.

States had until August 31, 2026, to continue to make new reservations under prior guidance. All projects reserved on or before August 31 can be completed and paid after August 31. However, all new reservations made after August 31, 2026, must comply with requirements set out in the Program Notices. See the Program Notice Compliance Checklist for the steps that must be completed in the rebate process to document a formal reservation.

Any deadline extensions due to extenuating circumstances require prior DOE approval and must have been submitted to DOE before the August 31 deadline; DOE will not consider extension requests submitted after this date.

- B. [HOMES] [HEEHR] Please clarify the program launch approval process with the new guidance.**

Fully awarded states will receive an email from your DOE Project Officer that DOE has approved you to launch your state program. The Program Notices authorize states to launch their programs if they do **NOT** receive any additional DOE feedback within 30 calendar days following the submission of FINAL State Implementation Blueprint documents. However, if DOE notifies the state that we have additional feedback of any kind, states are **not permitted to launch** and the 30 calendar day timeline restarts upon the state's submission of responsive revisions to the FINAL State Implementation Blueprint documents.

States with a conditional award will receive notice from DOE that DOE will resume negotiations. States cannot launch programs until conditions are lifted in a formal award modification and states have submitted all required items including, but not limited to, 1) a revised Narrative document, 2) an updated Budget Justification Workbook, and 3) a Fraud, Waste, and Abuse Mitigation Plan, and received DOE review and approval of these submissions. A formal

award modification is required to lift conditions and move the conditional award into a full award. Once DOE no longer has any feedback on FINAL State Implementation Blueprint documents, which can occur after the full award is made, states are permitted to launch within 30 calendar days of no feedback from DOE on their FINAL State Implementation Blueprint documents.

Please note – states cannot launch new programs that do not comply with the new program guidance.

C. [HOMES] [HEEHR] Can a State Energy Office (SEO) make changes to program design after the application has been approved or the program has launched?

Yes, but the SEO must first obtain DOE approval of the proposed changes. The SEO must submit the documents with the reflected changes for DOE review and upon written notification from their Project Officer, they can proceed. Depending on the scope of the change, the formal modification of the grant agreement may not occur until a later date, and DOE will include in the written notification when states may proceed with executing their changes in advance of receipt of the revised grant agreement documents.

D. [HOMES] [HEEHR] Are you expecting all states to change their program names to Home Owner Managing Energy Savings (HOMES) and High-Efficiency Electric Home Rebates (HEEHR)?

No. States take ownership of their state program names. The name change of the program is at the federal DOE level to align with the names in the statutes.

E. [HOMES] [HEEHR] Do we need to resubmit blueprint documents and the Budget Justification Workbook?

States and territories with a *conditional award* must submit a new Narrative Document; Fraud, Waste, and Abuse Mitigation Plan; and Budget Justification Workbook using the new templates.

States and territories with a *full award* (including those with launched programs) can update their existing Narrative Document, Consumer Protection Plan, and Budget Justification Workbook to align with the new program guidance.

F. [HOMES] [HEEHR] What is the process if states would like to retract implementation blueprint plans so that they are not required to implement those activities as part of the award?

Please alert your Project Officer if you are choosing to retract any implementation blueprint plans that are no longer required. This is an optional decision that states are empowered to make and will need to be reflected in the revised Narrative Document. States opting to retract implementation blueprint plans should also review and update their Budget Justification Workbooks, if impacted.

G. [HOMES] [HEEHR] Will DOE be extending assistance agreement project periods beyond 2028?

Yes, DOE will be extending the period of performance dates for all awards through the statutory date of September 30, 2031. The Grants Officers may execute extensions if needed, however if the award is active and the period of performance end date is not quickly approaching, the extension will be included as part of the broader modifications package to reduce administrative burden.

H. [HOMES] [HEEHR] Will funding still be released in tranches?

No. Version 2.1 of the ALRD removed funding tranches and replaced them with progress tranches. All requirements except those superseded by the Program Notices are still in effect. We are recommending states review previously published guidance alongside the new Program Notices.

I. [HOMES] [HEEHR] When will changes to the PNNL API reporting elements be communicated and implemented?

The API Pre-Release Notes were issued on June 18, 2026, and changes to the API will begin rolling out for testing before the end of June. All changes were published to production on September 1, 2026. PNNL will be distributing communications to API users as the changes are made available. Sign up for the PNNL mailing list here: [Home Energy Rebate Tools | PNNL](#).

J. [HOMES] [HEEHR] For states that use the PNNL API system in real-time, is it possible to update the expiration date set for reservations to ensure that rebates reserved through August 31, 2026, remain active in PNNL until the project is completed?

Yes. States that utilize the real-time API can extend individual reservation expiration dates using the expiration-date API endpoint, if the reservation is still active (non-expired). Reservations created prior to configuration changes made to accommodate the Program Notices will maintain their original expiration date.

If a reservation is deleted and recreated on or after September 1, the new reservation must meet all requirements associated with the applicable Program

Notice. States should keep these considerations in mind when planning reservation management beyond August 31.

K. [HOMES] [HEEHR] Are homes that previously received upgrades funded by federal funds eligible to receive rebates for the same measures?

Yes. There is no legally prescribed period of time that needs to pass for a home to be eligible for the same upgrade from the Home Energy Rebates program. Generally, DOE strongly recommends against replacing a measure when it's still covered under the manufacturer's warranty. States should determine when it would be prudent to replace a federally funded (e.g., Weatherization Assistance Program) measure using rebate funds.

DOE strongly recommends reviewing program requirements in Version 2.1 of the PRAI to ensure the proposed measures meet the criteria of a HOMES or HEEHR project.

L. [HOMES] [HEEHR] Are conditionally awarded states permitted to use Early Administrative funds to revise award documentation?

Grantees should review the scope of their Early Administrative Awards to determine if they are permitted to use these Early Administrative funds to design and refine their program design. **Please be reminded that all grantees with Early Administrative Awards reviewed and signed attestation forms confirming they will not use award funds for activities that are no longer allowed.** Grantees should review [Program Notice 26-1](#) and [Program Notice 26-2](#) to identify activities that are no longer allowable.

PRAI Section 2.0 Definitions and Acronyms

A. [HOMES] [HEEHR] Can states allow manufactured or mobile homes to be eligible for Home Energy Rebates?

Yes. States may allow manufactured and mobile homes to be eligible housing types for Home Energy Rebates.

B. [HOMES] [HEEHR] What is a “qualified” contractor, distributor, or retailer?

A “qualified” contractor, distributor, or retailer is a participating entity that is known to the state and has received minimal vetting by the state as described in its Fraud, Waste, and Abuse Mitigation Plan, including any additional requirements imposed by the state.

States should communicate clearly to their residents that (1) an entity's "qualified" status only indicates program participation and minimal vetting; and that (2) the "qualified" status is NOT any quality endorsement or approval of those entities by the state or the U.S. Department of Energy.

PRAI Section 3.1.1 & Section 4.1.1 Program Requirements: Use of Funds

A. [HOMES] Do self-installation projects qualify for HOMES rebates?

No. Projects must be installed by a program-approved contractor to be eligible for HOMES rebates.

B. [HOMES] [HEEHR] Do product shipping and contractor travel costs count towards project costs or project-related/rebate delivery costs?

Section 3.3 of the Program Notices now allows the use of rebate funds to cover product shipping and contractor travel costs for all territories including PR, GU, CNMI, VI, and AS, as well as AK and HI to provide access to products not locally available. These shipping and contractor travel costs are project-related costs and should be categorized as rebate delivery funds in the Budget Justification Workbook.

PRAI Section 3.1.2 & Section 4.1.2 Program Requirements: Rebate Conditions and Levels

A. [HOMES] Has any of the eligible equipment under HOMES been changed as part of [Program Notice 26-1](#)?

No, HOMES is a whole-home energy upgrade program that is not technology specific. Home upgrades are based on energy savings levels. [Program Notice 26-1](#) does not change the eligibility of equipment for HOMES.

B. [HOMES] [HEEHR] Is ENERGY STAR optional across both programs?

No. ENERGY STAR is only optional for the HOMES program. Under the HEEHR program, ENERGY STAR is a statutory requirement for the enumerated products, if applicable.

C. [HOMES] May states narrow HOMES rebate eligibility for households or technologies (based on fuel, technology type, etc.)?

Yes. Within the scope of the PRAI, states may choose to restrict program eligibility to a narrower set of households, existing conditions, and/or

technologies. States are not required to offer HOMES for all technologies or all household types identified within the Inflation Reduction Act. However, states must continue to ensure that the minimum energy savings threshold is met for each project and that the project contains a “major upgrade” as defined in Section 2.0 of the PRAI.

D. [HEEHR] Can a multifamily building qualify for rebates at the moderate-income level if at least 50% of occupied dwelling units have incomes less than 150% AMI, including some households with incomes below 80% AMI?

Yes. Multifamily buildings are eligible for moderate-income rebate amounts if at least 50% of occupied dwelling units have incomes less than 150% AMI. The Program Requirements & Application Instructions defines a moderate-income multifamily building as a building with at least 50% of households with incomes less than 150% AMI. [Program Notice 26-2](#) clarifies that rebate eligibility for multifamily properties is not less than 50% of the occupied dwelling units having low-income or moderate-income households, based on area median income levels.

PRAI Section 3.1.3 & Section 4.1.3 Program Requirements: Low-Income Households

A. [HOMES] [HEEHR] Will there be any percent of allocations required to be reserved for low-income households? Are states allowed to provide 40 percent or more of awarded rebate funds to low-income households?

Yes. The program still requires that at least 10% of rebate funds are reserved for low-income multifamily households. DOE no longer requires states to reserve a certain percentage of rebate funds for low-income single-family households.

B. [HEEHR] May states exclude households whose income level is between 80-150% AMI for the HEEHR program?

No. Section 50122 of the Inflation Reduction Act explicitly states that eligible entities must be provided with rebates, and eligible entities include any household whose income is less than 150% of area median income.

C. [HOMES] [HEEHR] Do low-income tenants need to maintain their low-income designation for two years after completion of an eligible upgrade?

No. These low-income tenant protections were designed to prevent displacement, or increasing rent, to obtain higher-rent tenants based on property improvements rebated through HOMES or HEEHR. The owner does not need to

re-verify income after receiving rebates if the household, whose low-income eligibility status was already verified by the state rebate program, remains the same. If the owner is renting to a new tenant within two years of receiving a HOMES or HEEHR rebate, the owner must ensure that the new tenant's household income is less than 80% Area Median Income.

PRAI Section 3.1.5 & Section 4.1.5 Program Requirements: Processing and Delivering Rebate Funds to Eligible Rebate Recipients

A. [HOMES] Are partial payments applicable to HOMES for both the measured and modeled pathways?

Yes, for those states interested in pursuing partial payments on either one or both of those pathways, please reach out to your Project Officer. States will be required to submit their approach for providing partial payments to DOE for review and approval. DOE will provide states interested in providing partial payments additional guidance and application questions.

B. [HEEHR] Can states provide mail-in rebates instead of at point-of-sale?

No. States are required by statute to provide rebates at point-of-sale. However, states have options as to how to provide point-of-sale rebates to their state homeowners depending on which kinds of rebates they choose to offer within their state rebate program. In addition, if states have a plan to provide point-of-sale rebates via retailers, e-commerce providers, direct-to-consumer, marketplace vendors, and/or point-of-installation via contractors, then subject to full program requirements, states may also allow homeowners and/or multifamily building owners to apply for and receive rebates via mail after the program-qualifying purchase has been made, installed, and verified.

C. [HEEHR] Do states have flexibility to not offer rebates through retailers and instead work only with contractors?

Yes. States may determine the point-of-sale channels for which rebates will be provided. States may choose to work with a variety of retailers, including "big box" stores as well as independent retailers. States may also choose to work directly with contractors and direct installers. As long as states can verify income requirements and provide point-of-sale rebates, the channels for which rebates are offered are at the state's discretion.

D. [HEEHR] Please elaborate on the point-of-sale rebate option. Can we launch our program with one large retailer, or do we have to create multiple retailer options?

Under HEEHR, states are required to offer point-of-sale rebates for all measures that the state plans to provide as part of its state rebate program. States can decide how to offer point of sale. DOE encourages grantees to utilize options in how to provide point-of-sale rebates to promote visible consumer choice and energy affordability, including, but not limited to retail, e-commerce, direct-to-consumer and/or marketplace vendors. Grantees can also have different pathways for different qualified projects, depending on which kinds of rebates they choose to offer within their overall state rebate program.

This means that a state can provide point of sale via a retailer and then utilize other options such as mail-in rebates in addition to point-of-sale.

PRAI Section 3.1.6 & Section 4.1.7 Program Requirements: Data Collection and Evaluation

A. [HOMES] [HEEHR] What is the process for DOE-led evaluations? Are there opportunities for states to provide feedback during the evaluation process?

DOE plans to conduct national-level process, impact, and market effects evaluations aligned with program priorities to determine actual program impacts and progress toward goals, enable and support program improvement, and ensure the effective use of public investments. DOE intends to contract with an independent entity, such as a national laboratory, to conduct these evaluations, which will focus on HOMES and HEEHR results at the national level only (DOE will not report results by state or territory) and plans to include impact evaluation (energy and bill savings), process evaluation (insights from states, implementers, partners, and participants), and market effects evaluation (long-term and sustained market change indicators).

DOE expects to conduct limited evaluation activities during the program years of 2027-2030, with more comprehensive evaluation activities closer to the end of the program (2031-2032). If a state is selected for the evaluation sample, DOE will communicate any additional information needed, which may include market partner contact information, detailed project files, or billing data. Because the evaluation is expected to cover the entire nation, any single state is unlikely to have a large sample of projects selected. Prior to initiating the evaluation, DOE

intends to share its evaluation plan with states and clearly communicate timelines, requirements, and communication protocols.

B. [HOMES] What is the expanded flexibility for independent program evaluations?

Through [Program Notice 26-1](#), DOE has expanded flexibilities in Section 3.1.6.3 of the PRAI in the following ways:

- Section 3.1.6.3 previously required that states coordinate only with utilities to collect billing data for evaluation purposes. DOE has expanded this to allow states flexibility to coordinate directly with homeowners or building owners for billing data.
- Section 3.1.6 requires that states submit an evaluation plan for DOE review. Previously, DOE required the plan be submitted within three months of program launch. DOE recognizes that states may need additional time to develop evaluation plans and timelines tailored to their local context and residents' needs (for example, to solicit and hire an independent evaluator, or ramp from a pilot to full program) and now allows states flexibility to request an extension to this deadline.
- Section 3.1.6 previously required that states provide final evaluation results within 18 months of evaluation approval. DOE has removed this programmatic target date to provide expanded flexibility for states to develop evaluation plans and timelines tailored to their local context and residents' needs; states must instead provide evaluation results consistent with the timeline established in their evaluation plan.

PRAI Section 4.2.2 Program Requirements: Qualified Electrification Projects

A. [HEEHR] Is it allowable to install an electric measure when the current fuel source is gas, provided this does not constitute a fuel-switching action and the existing gas-fired system remains in place and is not decommissioned?

Yes. Electric appliances are allowable for upgrading from existing electric equipment to more efficient electric equipment and for new appliances that do not replace non-electric appliances. [Program Notice 26-2](#) allows dwellings to retain existing fossil-fuel HVAC systems when installing a heat pump, even if the heat pump will not become the primary source of heating and cooling.

B. [HEEHR] Can DOE offer guidance on DOE-approved insulation and air sealing levels?

No. DOE does not set standards for states for appropriate insulation and air sealing levels. Recognizing that each state has distinct climate zones and residential building characteristics, states are best positioned to determine the insulation and air sealing approaches most appropriate for their conditions. States must update their Narrative Documents to include the requirements by which they will determine if a dwelling unit requires additional insulation and air sealing and submit for DOE to review and approve as part of the state program's implementation and oversight.

C. [HEEHR] Does the HEEHR program allow non-ENERGY STAR insulation products?

For insulation, the HEEHR program allows eligible products where there is no ENERGY STAR certification available for that product type. The program requirement, in part, is stated below:

“4.2.2.2.1. Insulation. Eligible products include ENERGY STAR-certified blanket (batts and rolls) insulation, loose-fill insulation, blown-in insulation, rigid board (foam or fiber) insulation, spray foam, and foamed-in-place forms of insulation.”

Where there is an ENERGY STAR-certified product available for that product type (e.g., blanket insulation), the ENERGY STAR certified product must be used. However, other insulation products may be eligible under the HEEHR program where there is no ENERGY STAR certification for those product types.

D. [HEEHR] Can states set their own efficiency standards for product types that lack ENERGY STAR-certified products? When can states request DOE approval of an alternative equipment efficiency standard?

Yes, after receiving DOE approval, states may set their own efficiency standards for product types that lack ENERGY STAR certification. Per DOE's PRAI, within Section 4.2, ENERGY STAR-certified equipment must be installed when available for all rebated products under the HEEHR program (Inflation Reduction Act Section 50122). However, DOE may consider a state's or territory's proposal to use non-ENERGY STAR-certified products in circumstances such as but not limited to: (1) ENERGY STAR certification criteria for a necessary product type does not exist; and (2) ENERGY STAR certification criteria exist, but no product has been certified.

In all cases, states and territories seeking DOE approval to use alternative efficiency standards must provide a detailed justification for deviation from this requirement as part of their funding application. States who wish to propose alternative efficiency standards after their program is approved, may submit a detailed justification for deviation from this requirement for DOE review and approval.

E. [HEEHR] What scope of work or appliance may states allow for “electric load service center” rebates?

For “electric load service center” rebates provided through the HEEHR program, states may include, in addition to related work on existing circuit panels to accommodate new loads from rebated appliances, new load management devices or equipment (e.g., to avoid upgrades to existing circuit panels) that will help accommodate new loads from rebated appliances.

F. [HEEHR] What products are considered eligible for DIY?

Grantees may allow rebates for do-it-yourself (DIY) retail purchases and installations, where such installations are otherwise allowed by state and local building codes, with the exception of HVAC system installations which must be completed by qualified contractors.

G. [HEEHR] Can a dual-fuel heating and cooling system replace a single electric heating and cooling system?

Yes, an ENERGY STAR-certified dual-fuel system, comprised of two pieces of equipment (typically an electric unit and a non-electric unit), may replace a single electric system. However, rebates can only be used to cover the costs of the new electric unit, and its related components, as part of the broader system. Rebates cannot be used for the entirety of the dual-fuel heating and cooling system.

[Program Notice 26-2](#) Section 3.3 removes program allowances for upgrades for fuel-switching (i.e., replacement of non-electric appliances) and instead allows rebates for upgrading HVAC and appliances only from existing electric equipment to more efficient electric equipment. Appliances for new construction continue to be eligible under the program guidance.

H. [HEEHR] How is the ability to perform HVAC emergency replacements impacted by the new requirement to assess if the home has adequate insulation prior to a heat pump upgrade?

States may continue to provide emergency replacements through the HEEHR program. In cases of emergency heat pump replacements, applicants can be

approved for replacement of the HVAC equipment and be scheduled to receive an assessment of their insulation at a later date. Rebates for insulation and air sealing, if necessary, can be utilized at a later date. In the state's narrative application, the state must describe how they will ensure appropriate insulation and air sealing or utilization of rebates for insulation and air sealing in a timely manner.

I. [HEEHR] Has the requirement for heating and cooling upgrades to be the primary source been removed completely?

Yes. [Program Notice 26-2](#) allows upgrades from existing electric equipment to more efficient electric equipment and does not require these replacements to be the primary source of heating and cooling.

PRAI Section 4.2.3 Program Requirements: Installation Incentives

A. [HEEHR] Under the HEEHR program, can a state offer varying installation incentives for the same measure?

No. The installation incentive amount for the measure cannot vary depending on housing type, geographical location, or household income (low-income or moderate-income).

B. [HEEHR] Is the installation incentive for an eligible entity representative in addition to the rebate maximum per dwelling unit?

Yes. The installation incentive is in addition to the rebate maximum per dwelling unit.

C. [HEEHR] When do we consider DAC incentives no longer eligible under 50122? Is the cutoff date defined by the GFO memo issues on January 27, 2025, or by the updates outlined in [Program Notice 26-2](#)?

[Program Notice 26-2](#) eliminates all requirements related to disadvantaged communities (DAC), including the issuance of DAC incentives under the HEEHR program. Rebate reservations submitted after August 31, 2026, must adhere to the provisions set forth in [Program Notice 26-2](#); therefore, any rebate reservation received on or after September 1, 2026, must not include a DAC incentive. Rebate reservations submitted prior to September 1, 2026, may include a DAC incentive, even if the incentive is issued after that date.

D. [HEEHR] Can states limit the Eligible Entity Representatives (EERs) who are eligible for low-income installer incentives, or do states have to provide incentives to all entities that complete eligible low-income projects?

No. IRA section 50122(c)(5)(A) requires a "State energy office or Indian Tribe shall provide to that eligible entity, in addition to the rebate, an amount that- (i) does not exceed \$500; and (ii) is commensurate with the scale of the upgrades installed as part of the qualified electrification project, as determined by the Secretary." States are not able to limit which eligible entity representatives receive installation incentives. States may elect to reserve these incentives for projects carried out in homes and dwelling units with households less than 80% AMI, and/or for installations of equipment not commonly installed to encourage contractors to serve low-income households and learn how to install newer technologies.

PRAI Section 3.2.4 Program Requirements: Project-Specific Energy Savings Calculations

A. [HOMES] Can DOE provide clarification or more details on the state-led impact evaluation pertinent to the uncalibrated modeling consistent with BPI-2400 Annex E?

In accordance with Section 3.2.4.1.1 of the PRAI, states are required to conduct impact evaluations when utilizing an alternative modeling approach for projects that are excepted from the BPI-2400 calibrated modeling requirement. However, states do not have to evaluate projects if they use one of the alternative modeling approaches listed below:

- Single Family: Home Energy Score
- Multifamily: Modeling Option 1 or Option 2
- Multifamily: Modeling Option 3 after DOE determination that the state has provided sufficient evaluation results that prove the proposed modeling methodology is reliable.

Evaluation is required if a state uses alternative modeling approaches not listed above. All alternative modeling approaches must be documented and approved in the state application narrative, regardless of if an evaluation is required.

B. [HOMES] What is the expanded flexibility for single-family modeling exceptions and alternative approach proposals?

As described in Section 3.2.4.1.1 of the Program Requirements, states may use alternative approaches for homes where BPI-2400 calibration is not feasible.

[Program Notice 26-1](#) Section 3.5.3 expands the allowable alternative approaches to address how to model homes with onsite generation technologies (refer to [BPI-2400 Technical Interpretation](#)).

In addition, for single-family modeling exceptions, states that opt to use the Home Energy Score tool need only identify this method in their narrative response, and no state-led impact evaluation will be required.

Finally, states may propose alternative approaches to DOE in their application narrative for reliably calculating energy savings, such as other methods aligned with BPI-2400 Annex E, simplified calculators, or prescriptive savings methods. Any proposed alternative approach must be reviewed and approved by DOE and will require a state-led impact evaluation.

C. [HOMES] What is the approach for multifamily modeling exceptions and alternative approach proposals?

For multifamily projects, DOE's Multifamily Guidance includes three options for energy modeling. Option 1 (an ASHRAE 140-20006 tested tool from this [list](#)) and Option 2 (QBAT modeling tool) do not require review and approval by DOE or evaluation by the state. For multifamily Option 3, the state-proposed methodology must be reviewed and approved by DOE, and a state-led impact evaluation will be required unless the state provides independent evaluation results that DOE determines sufficiently prove the methodology's reliability.

PRAI Section 3.2.5 & Section 4.2.5 Program Requirements: Consumer Protection Through Quality Assurance

A. [HOMES] Is the removal of the post-install geotagged photo requirement from the HOMES program a requirement for the photo or the geotagged metadata, or both?

Both. DOE no longer requires either the photo or the geotagged metadata in the post-installation verification process.

B. [HEEHR] Are geotagged photos still required for the HEEHR program?

Yes. Geotagged photos are still required for the HEEHR program. However, if technical limitations impact the ability to obtain geotagged metadata, grantees may propose to DOE in the Narrative document an alternative approach to pre-installation and post-installation photos that provides assurance of installation.

Geotagged photos are a critical element of fraud, waste and abuse mitigation in the Home Energy Rebates Program. These photos are important documentation to ensure that eligible equipment is installed in eligible homes. DOE depends on our state and territory partners to reduce and mitigate fraud, waste, and abuse in this program and photos are an important method towards that goal.

C. [HOMES] [HEEHR] Under Section 3.4 of [Program Notice 26-1](#) and [Program Notice 26-2](#), what does it mean that DOE is removing requirements for “internal review plans”?

In accordance with the Program Notices, DOE is replacing the Consumer Protection Plan with a Fraud, Waste, and Abuse (FWA) Mitigation Plan to prioritize good stewardship of taxpayer funds. See the FWA Mitigation Plan for specific requirements.

In addition, and according to best practices in [2 CFR 200.303](#), documenting the assessment of risk allows states to reevaluate the risks to its programs and respond accordingly when the environment changes. Therefore, DOE also recommends aligning FWA Mitigation Plans and associated program oversight with the guidance in Standards for Internal Control in the Federal Government issued by the Comptroller General of the United States or the Internal Control-Integrated Framework issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). While states should consider leveraging these additional, preventative control activities, such as internal review plans, they are not required to be submitted to, or approved by, DOE.

PRAI Section 3.2.6 Program Requirements: Post-Installation Certificate

A. [HOMES] Does [Program Notice 26-1](#) remove the requirement for both onsite and virtual post-installation inspections?

Yes. For the HOMES program, post-install inspections outside of those included in the state's third-party post-installation project certification process are no longer required, including onsite and virtual inspections. However, third-party post-installation project certificates are still required. States are encouraged to create their own plans to ensure quality assurance and quality control for all HOMES projects, including those conducted by new contractors.

PRAI Section 3.3.2 & Section 4.3.2 Program Requirements: Integrating with Other Programs

A. [HOMES] [HEEHR] Can states stack Home Energy Rebates for a single project if the rebates do not exceed the total project cost?

Yes. Stacking may be permitted if the HOMES and HEEHR rebates do not fund the same upgrade or qualified project, as in they can be used for different upgrades or qualified projects as components of the total project.

States must be mindful of the sequencing of upgrades as they relate to HOMES modeling and measured pathways. HEEHR-rebated measures cannot be used to achieve energy savings thresholds in a model and HEEHR rebates cannot be executed if the dwelling is actively undergoing energy usage monitoring for a measured project.

B. [HOMES] [HEEHR] What does it mean that homeowners can direct payment to an aggregator / eligible entity representative? Is this specific to the homeowner's portion of the rebate? What is changing from prior guidance?

Under the HOMES Rebate Program, a homeowner that would otherwise receive the rebate value may direct that payment to an aggregator, such as a third-party lender, after completion of a related transaction (e.g., equipment purchase/installation for a modeled pathway retrofit, or upon verification of energy savings achieved for a measured pathway retrofit). In this situation, the homeowner would not receive any additional rebate payment for that transaction. To facilitate this action, the state or implementer would remit payment to the aggregator once the aggregator submits all required data and documentation regarding the rebated project. Aggregators would be subject to all programmatic requirements and may facilitate other permissible actions as described in the program requirement materials.

Under the HEEHR Program, an eligible homeowner that would otherwise receive the rebate value may direct that payment to an eligible entity representative (EER), such as a third-party lender, upon the completion of a qualified project. In this situation, the homeowner would not receive any additional rebate payment for that transaction. To facilitate this action, the state or implementer would remit payment to the EER once the EER submits all required data and documentation regarding the rebated project. EERs would be subject to all programmatic requirements and may facilitate other permissible actions as described in the program requirement materials.