HOME ENERGY REBATES
FRAUD, WASTE, AND ABUSE MITIGATION PLAN

State of West Virginia
Home Energy Rebates
Inflation Reduction Act
(50121)

July 2026

WEST VIRGINIA
OFFICE OF
ENERGY

West Virginia Office of Energy: A Division of the West Virginia Department of Commerce
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Contents

Background and Objectives

1. **Describe how the Fraud, Waste, and Abuse (FWA) Mitigation Plan will be made readily accessible to all program participants affected by it, including implementers, participating contractors, third-party inspectors, aggregators, homeowners, and building owners.**

   The state will make the Fraud, Waste, and Abuse Mitigation Plan publicly accessible on the state energy office website, energywv.org, in an ADA compliant format. All program participants will have access to download or request printed copies of the plan. The FWA Mitigation Plan will include a version date to ensure participants can reference the most recent version.

2. **Confirm that the state will execute agreements with participating contractors and aggregators in which the party agrees to comply with the FWA Mitigation Plan and procedures.**

   Select all that apply:

   ☑ The state will execute agreements with participating contractors in which the party agrees to comply with the FWA Mitigation Plan and procedures.

   ☑ The state will execute agreements with participating contractors in which the party agrees to comply with the FWA Mitigation Plan and procedures. *(Note: Check this box only if your program will engage aggregators.)*

3. **Describe how the state will retain records related to their FWA Mitigation Plan processes and permit access to DOE upon request.**

   All records related to fraud, waste, and abuse mitigation, including but not limited to complaints, concerns, sampling rates, findings, and corrective action, will be maintained by the implementer for a minimum of 7 years. All records will be stored digitally and upon request the state will provide DOE with access to the digital system.

Consumer Feedback

4. **Describe the program's system for collecting and responding to consumer feedback that allows households to file complaints, concerns, and issues directly to the implementer(s) (e.g., a consumer hotline and/or email).**

   The state will provide household consumers with the ability to file complaints, concerns, and issues via a consumer hotline, email, and webform (online intake tool). Consumers can ask general questions about the state program or issue a complaint or concern regarding program services by sending an email to wvoeinfo@wv.gov or by calling 833-549-3833. When a consumer reports an issue, a staff member will reach out within two

(2) business days.

All consumer feedback reporting mechanisms, documents, and other communications will meet ADA accessibility standards and the needs of non-English language speakers, including documents available in Spanish and other languages as appropriate. Consumers can also request hard copies of online documents.

If consumers use a consumer hotline phone number to submit information regarding program issues, the state will record the call to capture the customer's concern. The hotline will meet ADA accessibility standards. The recordings are to be stored for processing to ensure that the information provided by the customer is available to best resolve the issue.

The state will leverage the Complaint Resolution Template and the Neighborly Platform to record and track consumer feedback. The reporting system will capture relevant information, including the name of the associated party, contact information, and location, as well as any submitted documentation related to the issue including photographs and PDF document uploads.

5. **Describe the program's procedures for addressing negative feedback, including how programs will communicate the feedback to affected contractors or aggregators.**

   Consumer feedback will be regularly reviewed for negative comments and addressed with the affected contractors and/or aggregators during virtual or in-person program meetings within the appropriate timeframe based on the predetermined priority (e.g., P1 = 24 hours, P2 = 48 hours, P3 = 1 week). Feedback to program administrators will be shared through email communications, regularly scheduled meetings (e.g., weekly, bi-weekly check-ins), or phone calls.

Pending the severity and/or volume of the comments, the contractor will be placed on a performance plan or receive additional Quality Assurance (QA)/Quality Control (QC) training until their performance is satisfactory.

6. **Describe how households who reside in a multifamily building but are not the direct program participant will have the opportunity to convey feedback. Include the consumer feedback process and corresponding directions for these non-direct participant households.**

The state will require that landlords of multifamily buildings receiving rebates for central upgrades or upgrades in common areas distribute the state's Fraud, Waste, and Abuse Mitigation Plan and a link to the program's webpage (that includes information on the consumer hotline, email, and webform) to all tenants via email or written letter. Landlords will also be encouraged to post signs in the building lobby and common spaces regarding the upgrades and consumer feedback pathways.

Feedback submitted by multifamily residents will receive the same level of review, investigation, documentation, and consumer protections afforded to single-family participants. When appropriate, investigations may include interviews with residents, onsite inspections, contractor file reviews, quality assurance evaluations, and coordination with property management personnel.

To encourage open reporting, residents will be informed that feedback may be submitted confidentially and that retaliation against individuals reporting concerns is prohibited. The Office of Energy will monitor complaint trends involving multifamily projects separately to identify systemic issues requiring additional oversight, policy revisions, contractor retraining, or enforcement actions.

The West Virginia Office of Energy has established a formal conflict resolution process to ensure all consumer complaints, contractor disputes, and program-related concerns are resolved fairly, consistently, and in a timely manner. The objective of this process is to protect consumers, maintain contractor accountability, safeguard federal investments, and preserve confidence in the Home Energy Rebates Program.

Upon receipt of negative feedback or a dispute, program staff will conduct an initial review to determine the nature of the issue, identify affected parties, evaluate any immediate health or safety concerns, and assign a priority level based on the potential impact to the consumer or program.

Resolution Procedures

7. **Describe how the program will implement existing state laws and regulations regarding conflict resolution procedure for how disputes will be resolved between homeowners/ building owners and contractors/aggregators.**

   Note: The procedure may include protocols for a timely response, identification of responsible parties, documentation of corrective actions, results, and a means of identifying and addressing systemic issues. In accordance with Program Notice 26-1, Section 3.4, states are not required to implement dispute resolution procedures beyond existing state laws and regulations.

West Virginia will implement existing state laws and procedures to resolve disputes between homeowners, building owners, contractors, and aggregators under the program. In accordance with Program Notice 26-1, Section 3.4, the state does not establish dispute resolution procedures beyond these established statutory mechanisms.

West Virginia Dispute Resolution Framework:

- Notice and Opportunity to Cure Construction Defects (W. Va. Code 21-11A): For disputes alleging workmanship defects, the program adheres to the mandatory pre-lawsuit procedures outlined in state law. Homeowners must deliver a written, signed notice detailing the construction defect to the contractor or aggregator via certified mail at least 90 days before initiating any formal action. The contractor then has 30 days to respond in writing to offer a remedy, request a site inspection, or dispute the claim to encourage negotiation in good faith.
- West Virginia Consumer Credit and Protection Act (W. Va. Code 46A): Any disputes involving billing fraud, bait-and-switch tactics, or unfair and deceptive practices will be governed by state consumer protection laws. Consumers maintain the right to file formal complaints with the Office of the WV Attorney General Consumer Protection Division for investigation and resolution.
- Contractor Licensing Board Procedures (W. Va. Code R. 28-3-4): If a dispute involves licensing, code violations, or contract breaches, parties can submit a written complaint to the West Virginia Contractor Licensing Board. The board manages a structured procedure to review, investigate, and issue orders to correct violations or enforce disciplinary actions.
- Contractual and Civil Remedies: The program recognizes alternative dispute resolution mechanisms, including voluntary mediation or binding arbitration clauses included within the scope-of-work agreements. Unresolved contractual disputes remain subject to West Virginia's standard civil court timelines, including the 10-year statute of limitations for written contracts under W. Va. Code 55-2-6.

To ensure full transparency and timely responses, all participating contractors and aggregators must acknowledge these West Virginia statutory processes and respective Service Level Agreements (SLAs) before engaging in program-funded work.

8. **Describe the program's remediation process to ensure that when deficiencies are detected through the quality assurance/quality control process, these results are communicated to the responsible party, and any remedial or punitive actions taken follow a pre-defined set of protocols.**

   Note: States may describe the specific remedies and penalties for deficiencies or unfair business practices that it will utilize in its rebates program if fraud or unfair business practice is detected or if quality assurance/quality control procedures find an improper installation of a rebate funded

measure. The remedies included for the program should make a consumer whole and provide some measure of deterrence against unacceptable practices. In accordance with Program Notice 26-1, Section 3.4, states are not required to implement dispute resolution procedures beyond existing state laws and regulations.

West Virginia will develop and maintain a standard remediation process which can be applied to each third-party agreement. When deficiencies are detected through the quality assurance/quality control process, the results will be recorded, communicated, and shared to the responsible party within 2 business days. Any remedial or punitive actions taken will follow a pre-defined set of protocols as follows:

- A record of deficiency
- An assessment of the level of severity regarding the issue related to the project inspection/quality assurance evaluation
- Determination of remedial or punitive action in accordance with the severity of deficiency by the appropriate parties. (e.g., program implementer)
- Formal communication to the responsible party
- Fulfillment of remedial or punitive action, including state verification of conformance to requirements

West Virginia will also establish an investigation process for fraud allegations against any program participant, be it a contractor, customer, aggregator, or any other participant. Part of this process is to also include the details of punitive consequences that may include fines, removal from future eligibility to participate in the program, as well as possible criminal charges.

Data Review

9. **Describe how the state will verify auditing tools and modeling software have basic data validation controls on inputs to ensure data quality for all projects.**

The state will utilize SnuggPro and the Neighborly Platform to ensure that data validation controls such as exception handling and file processing error alerts are in place. The state will develop an exhaustive list of requirements that the tool must meet. Additionally, the state will outline business procedures to address data exceptions and train the appropriate staff for timely resolution and documentation.

The state will investigate systems that can use “smart” technology to automatically read uploaded documents for income verification and/or other purposes. For example, the state would like to use a system (if not cost-prohibitive) that accurately reads the applicant's information including address on enrollment cards from various categorically eligible programs.

10. **Certify that the state will conduct data or file review of all projects that verifies at a minimum:**
    - **The home assessment gathered the data required in PRAI Section 3.2.2;**
    - **The contracted scope of work was specified consistent with program requirements;**
    - **The address of the installation matches the address on the rebate reservation;**
    - **For low-income rebates, rebated amount aligns with the verified income category; and**
    - **The household was provided the Post-Installation Certificate as specified in PRAI Section 3.2.6.**

    ☑ Yes, the state confirms the above statement.

11. **Describe how the state will verify the home assessment gathered the required data for each specific rebate.[1]**

    The state will randomly select a statistically significant number of home assessments to conduct monthly data audits to ensure all required data for the home assessment is captured. Additionally, the state will follow the standardized data specifications and guidelines within the IRA Home Energy Rebates: Data and Tools Requirements Guide for data captured within the assessment to ensure data compatibility. Home energy assessment data for large multifamily buildings will be consistent with Building Sync.

12. **Describe how the state will verify that the contracted scope of work specified was consistent with program requirements for all projects.**

    The state will develop a standardized scope of work template for implementers consistent with program requirements to ensure program requirements are met. The state will require the implementers to use this template to capture necessary information and provide guidance on program requirements. The program implementer will review all invoices for work performed to confirm the contracted scope of work specified was consistent with current program measures and equipment eligibility requirements (e.g., equipment types and model numbers listed on the invoice are eligible for rebates under HOMES programs) prior to paying out rebates.

1 The requirements for a home assessment can be found in Section 3.2.2 of the Home Energy Rebates Program Requirements & Application Instructions (PRAI) document.

The template has been integrated into the Neighborly Software Platform, for easy digital access for contractors. DOE seal has been removed from the template.

13. **Describe how the state will verify the address of the installation matches the address on the rebate reservation for all projects.**

The program implementers will review geo-locational data or contractor documentation for all projects to confirm the address of installation matches the address on the rebate reservation prior to paying out rebates. The state's preferred method of installation address validation is by geo-locational data. Locational data could additionally be captured through various means such as GPS, or within photo/image locational meta data. If unavailable, the state will require additional proof of address through documentation such as utility bill submission. The state will require acknowledgement that installation was performed at the claimed installation address by the contractor via a signed and dated installation confirmation document (e.g., invoice).

In addition to the standard data review of addresses for all projects, the state plans to randomly select and conduct quality assurance/quality control on 15% of all claims submitted for the first year. Through this quality assurance/quality control process done remotely or in person, the state will verify what equipment was installed and where it was installed. If more than 90% of the randomly selected claims prove to be accurate, then the state may choose to decrease the percentage of randomly selected claims over time.

14. **Describe how the state will verify the rebate amount aligns with the verified income category for all projects provided to low-income households.**

Program implementers will ensure the rebated amount aligns with the verified income category for low-income rebates by requiring a submittal of the proof of income for each rebate issued. The state will verify the documented proof of income by requesting updated income data from source systems/qualifying programs.

15. **Describe how the state will verify that the household was provided the required Post-Installation Certificate.[2]**

The program implementer will confirm consumer receipt of the certificate as specified in Section 3.2.6 of the Program Requirements & Application Instructions by obtaining data such as email send confirmation, home/building owner signature, and/or a photographic proof of certificate displayed in the window of the building in which the work was performed.

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2 The requirements for the Post-Installation Certificate can be found in Section 3.2.6 of the Home Energy Rebates Program Requirements & Application Instructions (PRAI) document.

16. **Confirm that the state will require program implementers retain all project data that is required as part of the Data & Tools Requirements Guide.**

☑ Yes, the state confirms the above statement.

17. **Describe how the state will require program implementers to retain project data on proof of combustion safety testing on fossil fuel equipment in all homes where fossil fuel systems have been impacted by the installation, in accordance with applicable state and/or municipal building code standards on health and safety testing.**

    Note: Combustion safety testing is strongly recommended when major atmospherically venting combustion appliances (i.e., HVAC systems and water heaters) remain in place after heat pumps, heat pump water heaters, air sealing, and/or insulation that has an air sealing effect has been installed. For states that offer DIY options, DOE recommends making best practice installation procedures available to homeowners and building owners performing their own upgrades.

    The state will require testing sign-off by a qualified contractor that the fossil fuel equipment meets the performance requirements in accordance with applicable state and/or municipal building code standards on health and safety testing. The program's implementers will retain proof of combustion safety testing on fossil fuel equipment in all homes where fossil fuel systems have been impacted by the installation accordance with standard record retention policies, for 7 years.

18. **Describe how the state will maintain records on Quality Assurance (QA)/Quality Control (QC) inspections including sampling rates, findings, corrective actions taken, and verification of conformance to requirements.**

    The state will maintain record of quality assurance/quality control inspections including sampling rates, findings, corrective actions taken, and verification of conformance to requirements in accordance with standard record retention policies, for a minimum of 7 years. This comprehensive digital archive will remain fully accessible to the federal Department of Energy upon request to ensure complete transparency, program accountability, and compliance with long-term federal auditing standards.

19. **Describe the training or credentials of the personnel conducting the data/file review.**

    The state will assign WVCAP & EVERBLUE the responsibility of conducting the data/file review. Qualifications for the person(s) that will be tasked with such responsibilities will be as follows: bachelor's degree or equivalent experience, the Home Energy Professional (HEP) Quality Control Inspector certification, and completion of identified yearly compliance training.

Contractors and Other Partners

20. Describe how the program will initially develop the qualified contractor list.

The state will partner with electric and gas utilities as well as sanctioned state agencies to develop a qualified contractor list. Contractors needed to fulfill program requirements include Energy Auditors, HVAC Technicians, Weatherization Specialists, QAQC professionals and more. The state understands that these entities may have developed comprehensive vetting processes to ensure contractors are highly qualified, hold active certifications, and offer consumers reputable services. The contractors must also meet the state's minimum licensing, insurance, and labor standards to qualify for program enrollment.

West Virginia will target outreach to contractors that specialize in HVAC, insulation, electrical, and associated building performance work. Through presentations at existing gatherings and advertisements in relevant publications, the state will create awareness and garner interest in participating as a qualified contractor for the state's HOMES rebate program.

21. Describe which qualification(s) contractors will be held to, potentially including but not limited to home performance industry credentials, training requirements, business insurance and licensure, skills standards, and labor standards.

To qualify for participation in the West Virginia Home Energy Rebates Program, contractors must meet stringent credentialing, licensing, insurance, and skill standards designed to maximize installation quality and worker safety. First and foremost, participating professionals are held to advanced training requirements, anchored by the state's comprehensive 375-hour certification program. Through this structured curriculum, participants must successfully complete 11 sequential training pathways that build directly upon one another, starting with vital occupational safety foundations like OSHA training and progressing to Building Science Principles, advanced air sealing techniques, and diagnostic protocols. This specialized sequence culminates in the student earning the official West Virginia Energy Efficiency Contractor Credential, providing complete coverage of all advanced structural and mechanical upgrades eligible under the state's rebate programs.

Beyond these industry-specific credentials, all businesses must satisfy fundamental state business licensure and financial protection requirements before being authorized to perform work. Contractors must maintain an active construction license in good standing with the West Virginia Contractor Licensing Board and remain fully registered with the West Virginia State Tax Department. To guarantee robust consumer and worker protection, businesses must also submit verifiable proof of standard commercial general liability insurance, active worker's compensation coverage, and dynamic unemployment insurance. Specialty trades, such as those performing heat pump installations, must additionally possess specific West Virginia Division of Labor HVAC Technician Certifications to legally execute mechanical configurations.

All contractors must also submit documentation showing proof of all required legal documents that are up to date including any licenses, insurance requirements, permits and other relevant documents required for contractor participation.

22. **Describe the process by which contractors will be added to the qualified contractor list.**

Note: The process should include how implementers will review and consider contractors trained under IRA 50123 if applicable.

All prospective contractors will be evaluated by the program implementers and Everblue to ensure that they meet the program requirements. Once all parties, including the state, have confirmed compliance with the program requirements, including obtaining or submitting proof of relevant certifications and licenses, the contractor will be added to the qualified contractor list and will then be eligible to complete projects that receive home energy rebates.

The state will perform due diligence on contractor and distributor entities that will be on their qualified contractor lists to prevent the listing of fraudulent or illegitimate entities including but not limited to screening through local and state databases as well as the federal Do Not Pay (DNP) system. See details on the state's due diligence processes described in Question 24.

The state will work with the appropriate implementation teams to review and include contractors for consideration who are trained under the WVEEC funded initiative. Additionally, the state will conduct outreach campaigns to contractors that have completed the training to apply for inclusion on the qualified contract list.
Currently, IRA 50123 is not applicable. Should the state receive this award, this response may be updated and resubmitted to DOE for approval.

23. **Please confirm the following:**

- **Confirm that state will apply to access the U.S. Department of Treasury's (Treasury) "Do Not Pay" (DNP) database.**

☑ Yes, the state confirms the above statement.

- **Confirm that the state will use the "Do Not Pay" database to vet potential**

contractors before they are added to its Qualified Contractor List, which will help to reduce fraud, waste, and abuse.

☑ Yes, the state confirms the above statement.

24. **Describe how the state will perform due diligence on contractors that will be on their Qualified Contractor List and how they will prevent the listing of fraudulent or illegitimate entities.**

Note: In accordance with [Program Notice 26-1](), Section 3.4, states are required to apply to access and use the "Do Not Pay" database to vet potential contractors to be added to their Qualified Contractor List, in order to reduce fraud, waste and abuse.

The state will perform due diligence on contractor and distributor entities that will be on their qualified contractor lists to prevent the listing of fraudulent or illegitimate entities. The state will use the "Do Not Pay" database to vet potential contractors prior to adding to the qualified contractor list. The state will also investigate consumer complaints and/or match the business credential against state business entity lists or other available public records to ensure that the business addresses are legitimate.

If an entity appears as an active match on the federal Do Not Pay list during pre-eligibility screening or real-time pipeline monitoring, the WVOE will take immediate administrative action to protect federal funds from fraud, waste, and abuse.

The affected contractor will be immediately suspended or barred from program participation, and their status on the state's certified contractor database will be restricted to prevent the submission of any new project scopes of work.

Furthermore, the program tracking platform will automatically freeze all pending, in-progress, or completed rebate disbursements associated with that specific contractor's tax identification number or Unique Entity Identifier (UEI). The WVOE will issue a formal written notice of non-compliance to the contractor within two business days, outlining the federal database match and initiating a mandatory state-level administrative review. To satisfy federal reporting requirements, the state will simultaneously document the match within its compliance ledger and flag the entity for the DOE PO to ensure complete transparency and alignment with long-term federal oversight standards.

25. **Describe the conditions that would lead to a contractor being delisted and the process by which a contractor would be delisted.**

Contractors who no longer meet the minimum requirements and standards in accordance with the associated programs will be removed from the qualified contractor list. This includes but is not limited to contractors that have received complaints and/or negative feedback as listed in the Consumer Feedback section of the FWA Mitigation Plan and/or contractors that failed to comply with processes defined in the Resolution Procedures section of the state's FWA Mitigation Plan no more than three (3) times. It may also include instances where the contractor is found to have committed some type of fraud against the program.

Prior to delisting, the program will formally inform the contractor of the pending action by sending a written Notice of Intent to Delist via certified mail and electronic mail. This notice will clearly detail the specific grounds for delisting, the effective date of the removal, the evidence supporting the decision, and instructions on how the contractor may submit a written appeal or response within a designated timeframe (e.g., 14 business days). If the delisting is finalized, a final written Notice of Delisting will be issued to the contractor.

The contractor will then be removed from all associated listings on all digital channels and printed material. The contractor will also no longer be allowed to tout or promote the ability to contract work on behalf of the Home Owner Managing Energy Savings Rebate Program (IRA Section 50121).

The program may reinstate enrolled contractors according to the timeframe established in the written notification of delisting. Contractors will be reinstated to the Qualified Contractor List provided they satisfy the requirements and/or timeline outlined in their delisting notification letter and/or performance improvement plan. The program will notify contractors of the decision to relist in the program in writing.

26. Describe how the state will make the qualified contractor list public and include a description of how consumers applying for rebates will be informed on how to use the list to access a qualified contractor.

Note: 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 an endorsement or approval of the state of the U.S. Department of Energy of performance by those entities.

The qualified contractor list will be publicly available on the state's website energywv.org, and hard copy upon request. The list will include a description of how consumers applying for rebates can use the list to access a qualified contractor and clarify that the qualified status only indicates program participation and minimal vetting, and is not an endorsement or approval of the state or Department of Energy. The state, any utility, or any program implementer is not to recommend any specific contractor to a customer, or via any marketing material. The state will also provide consumers with a hotline to address inquiries related to the qualified contractor list. It will also provide a hard copy of this information upon request.

27. **Describe how the state program will ensure energy savings are calculated using allowable methods according to the IRA 50121 statute language, including how approved tools/software will be identified, and how contractors will be alerted to these tools and trained on proper use.**

The state program will ensure energy savings are calculated as explained in response to the West Virginia's Home Owner Managing Energy Savings Rebate Program Application: "The state will be using SnuggPro authorized for use by DOE that can determine and document weather-normalized energy use of a home or portfolio of homes before and after the implementation of home energy upgrades. The software can estimate energy savings based on the data and information collected in the home assessment and will define, calculate, and report energy savings for the purposes of the rebate threshold as kWh or kWh equivalent."

The state will alert contractors to these tools and train them on proper use by hosting in-person events, webinars, and/or video style training series. The state will conduct formal outreach through email and other marketing materials to ensure contractors are aware of how to access and participate in training.

28. **Describe how the state will educate contractors and building owners to invest in envelope improvements before investments are made in mechanical equipment.**

The state will educate contractors and building owners to prioritize investment in envelope improvements that have the greatest impact such as air-sealing and insulation to reduce air leaks, thus reducing costs. These materials and communications will reference the DOE Better Buildings Solution Center's "Building Envelope" page and will be included as content and activities within the program's overarching outreach and education activities. Contractors will receive training with this information when they join the qualified contractors list and will be encouraged to communicate the benefits of envelope improvements prior to mechanical equipment upgrades to building owners.

The state will encourage contractors to run at least one comparative model that includes envelope improvements to demonstrate how different options are likely to affect energy use and utility bills. The state will also encourage contractors to provide standard information regarding how a home's conditions interrelate and how envelope can affect comfort, moisture, etc.

Installation

29. **Describe the quality installation standards that the state will use for its HOMES program, including links and references to existing industry standards (e.g., ANSI/ACCA 9, BPI, ENERGY STAR, etc.).**

All installed measures shall comply with manufacturer specifications, all applicable state and local codes, including but not limited to: BPI Standards (technical competency and testing) and Snugg Pro on BPI, U.S. Department of Energy Standard Work Specifications (SWS) (installation quality), State program technical requirements, Manufacturer installation instructions, Applicable state and local building codes, and Program Quality Assurance and Quality Control protocols. The state code is based on International Energy Conservation Code (IECC) 2015.

To ensure installation quality across all rebated technologies, the state maps specific industry standards to each eligible measure as follows:

- Building Envelope Improvements (Insulation and Air Sealing): Must comply with the U.S. Department of Energy Standard Work Specifications for single-family or multifamily home energy upgrades, as well as Building Performance Institute (BPI) standards (including BPI-1100 and BPI-1200) for comprehensive air tightness testing, technical competency, and diagnostic modeling performed through Snugg Pro.
- Heat Pumps and Central Air Conditioners (Space Heating and Cooling): Must be installed in compliance with ANSI/ACCA 5 QI (HVAC Quality Installation Specification) and ANSI/ACCA 9 (QIV) protocols to verify proper sizing, correct refrigerant charge, and adequate system airflow.
- Heat Pump Water Heaters: Must be installed in accordance with manufacturer installation instructions, applicable state plumbing codes, and the specific equipment installation pathways outlined in the DOE SWS Section 7.03 (Water Heating).
- Smart Thermostats and Home Energy Management Systems: Installation must comply with manufacturer specifications and meet the standard programmatic criteria established for ENERGY STAR Certified Connected Thermostats.
- Ventilation Systems (Whole-House and Local Mechanical Exhaust): All mechanical ventilation upgrades tied to weatherization or building tightness measures must meet the requirements of ASHRAE Standard 62.2 for acceptable indoor air quality.

30. **Describe how the state will document that the installation of energy efficiency upgrades is aligned with the required installation quality standards.**

The state will require contractors to use the PNNL Quality Install Tool to ensure and document quality installation of all upgrades.
Proper weatherization measures are building-shell, mechanical-system, and related health-and-safety improvements that reduce a home's total energy consumption, improve comfort, and support the projected energy savings required by the Section 50121 program.

Under the DOE Section 50121 Home Efficiency Rebates Program, proper weatherization measures are improvements that reduce the home's overall energy use, such as:

- Air sealing around penetrations, cracks, doors, and windows
- Attic, wall, floor, insulation
- Duct sealing and duct insulation
- Heating and cooling system improvements or replacement
- Mechanical ventilation needed to maintain healthy indoor air quality
- Energy-efficient windows, storm windows, or exterior doors when justified
- Water-heating improvements
- Minor repairs necessary to safely install an energy-saving measure
- Health and safety work directly related to the energy retrofit

The state will require weatherization upgrades prior to the installation of HVAC units under the HOMES Program. Other measures installed under this program will not require prior weatherization.

31. **Describe the quality assurance/quality control processes that the state will use to verify that quality installation standards have been met.**

The state will conduct third party on-site quality assurance on the first five projects completed by each qualified contractor.

The state will regularly randomly sample the lesser of a statistically significant sample or 15% of all completed projects for on-site follow-up and verification of installed equipment and assessment data, as feasible.

The state will also conduct on-site quality assurance inspections based on homeowner or building owner concerns.

The on-site quality assurance/quality control will include a minimum of:

- A visual inspection of the site and work conditions;
- Verification that the installed measures match the contracted scope of work and any change orders have been appropriately documented;
- Verification that diagnostic test results are accurate; and
- Verification that installation quality aligns with the standards.

Through automated data analytics (if resources allow) or more manual review, the state will compare documentation and data submitted across contractors and aggregators to detect outliers and potential problems with installations. At a minimum, this will be conducted no later than one year after program launch.

In the event on-site inspection is not available, a virtual inspection may occur. The virtual quality assurance/quality control will include a minimum of:

- A visual inspection of the site and work conditions;
- Verification that the installed measures match the contracted scope of work and any change orders have been appropriately documented;
- Verification that diagnostic test results are accurate; and
- Verification that installation quality aligns with the standards.

Through automated data analytics (if resources allow) or more manual review, the state will compare documentation and data submitted across contractors and aggregators to detect outliers and potential problems with installations. At a minimum, this will be conducted no later than one year after program launch.

32. **Confirm that for every home energy upgrade project that is installed:**

- **The contractor completed all health and safety testing as required by state and/or municipal building codes and standards. If any health and safety issues are identified, the issues will be remedied as required by the state or municipality.**
- **If a post-retrofit inspection was conducted, issues that resulted in a failed inspection will be remedied as required by the state or municipality.**

- **If the upgrade project impacted fossil fuel systems in the home, the contractor completed combustion safety testing and the state will maintain proof of testing.**
- **The state will recapture rebate funds if any of the above requirements are not met, as required, and will update the reported project data to reflect the cancellation of the rebate project.**

☑ Yes, the state confirms the above statement.

33. **Confirm that the state will ensure that sales language and contract language are the same.**

☑ The state confirms it will ensure that sales language and contract language are the same for projects that receive HOMES rebates.

34. **If financing is offered by a qualified contractor and/or aggregator, describe how the state will ensure an ability to repay determination that does not include projected savings from an energy report because expected savings may not materialize due to household and market developments.**

☑ N/A. Qualified contractors and/or aggregators will not offer financing to support home energy upgrades.

35. **If financing is offered by a qualified contractor and/or aggregator, describe how the state will ensure a disclosure and cooling off period, including at a minimum:**

- **Clear, written advance disclosures, with a 7-day waiting period between the disclosure and the contract signing. This waiting period should only be removed in a personal emergency (see Truth in Lending Act rules on this), where the homeowner, preferably in their own handwriting, describes the emergency and the need for the emergency work and their understanding that they are waiving the waiting period.**
- **In non-emergency circumstances, there should also be a 3-day right to cancel after the contract has been signed (such that the work is not done during that period).**

☑ N/A. Qualified contractors and/or aggregators will not offer financing to support home energy upgrades.

Continuous Improvement

36. **Identify what proactive steps the state will take to identify fraud, waste, or abuse.**

To safeguard federal funds and maintain program integrity, WVOE implements strict internal controls divided into four core operational areas.

1. Improper Payment Prevention

WVOE deploys pre-payment verification gates within the application pipeline to prevent erroneous or fraudulent disbursements:

- Duplicate Payment Checks: System-wide cross-matching of equipment serial numbers, utility account numbers, and physical addresses to ensure a single upgrade is not rebated multiple times.
- Address Verification: Mandatory integration with the USPS Coding Accuracy Support System to confirm the physical existence and geofencing eligibility of applicant residential structures.
- Income Verification: Execution of multi-layered income validation matching applicant tax records, pay stubs, or categorical eligibility documentation against localized Area Median Income thresholds.
- Contractor Validation: Universal cross-checking of all participating contractors against the federal Do Not Pay (DNP) portal and West Virginia state debarment registries prior to onboarding and project approval.

2. Fraud Detection

Proactive data analytics and monitoring protocols are utilized to identify high-risk submissions before funds are released:

- Pattern Analysis: Algorithmic scanning of application data to detect anomalies, such as repetitive equipment costs across unrelated projects, identical photos uploaded for different homes, or high volumes of rebates routed to a single bank account.
- Random Audits: Routine, statistically valid spot-checks of approved projects to ensure rigorous monitoring across all contractor tiers and geographic regions.
- Risk Scoring: Automated assignment of numerical risk values to applications based on flags like unverified phone numbers, rapid contractor onboarding, or pricing that deviates significantly from regional market averages. High-scoring applications are automatically routed for manual review.

3. Investigation Procedures

When a fraud allegation or detection flag is triggered, VWOE initiates a formal investigation utilizing standard operational procedures:

- Documentation Review: Comprehensive auditing of all project files, including invoices, equipment spec sheets, permits, utility bills, and signed consumer-contractor agreements. Contractor Interviews: Fact-finding interviews with the associated contractor to reconcile billing inconsistencies, verify labor hours, and review equipment chain-of-custody documentation. Site Verification: Physical field deployments or third-party remote video inspections of the residence to verify that the rebated equipment was fully installed, operational, and matches the submitted specifications.
- Referral Procedures: If an investigation uncovers credible evidence of fraud, waste, or abuse, the case is immediately referred to WVOE leadership and the WVOE General Counsel. Concurrently, the U.S. Department of Energy (DOE) and the DOE Office of Inspector General (OIG) will be formally notified within statutory timelines.

4. Recovery Procedures

Upon confirmation of fraudulent activity or improper fund distribution, WVOE will execute immediate mitigation steps to claw back public funds:

- Reimbursement Demands: Issuance of formal legal notices demanding immediate repayment of all improperly or fraudulently obtained rebate funds from the responsible entity.
- Contractor Suspension: Immediate administrative suspension of the contractor's credentials within the HOMES portal, halting all active project reviews and pending payments.
- Contractor Removal: Permanent termination of the contractor's participation status in the HOMES program and formal referral to the West Virginia Contractor Licensing Board for state license revocation.
- Criminal Referral: Forwarding of the complete investigative case file to the West Virginia Attorney General's Office, local law enforcement, and federal authorities for the pursuit of criminal charges under WV Code 30-42-14 and applicable federal statutes.

The State of West Virginia and the West Virginia Office of Energy maintain a zero-tolerance policy regarding fraud, waste, and abuse within the Home Energy Rebate program. Safeguarding federal funds and maintaining public trust are paramount priorities. Every allegation or automated flag will be investigated thoroughly, transparently, and swiftly according to these established procedures. By enforcing strict pre-payment controls, proactive detection analytics, aggressive fund recovery, and mandatory federal and state law enforcement referrals, the state ensures that program benefits are delivered exclusively to eligible citizens and ethical contractors. WVOE remains fully committed to upholding the highest standards of fiscal accountability and program integrity.

37. Explain how the state will implement automation to identify problem areas with program performance.

Program implementers will utilize a standard agreed upon data model to leverage Application Programming Interfaces (APIs) where available, automated secure data file transfers, and error handling alert mechanisms where applicable to ensure consistency, data accuracy, and minimize errors.

The state will leverage a business intelligence reporting application, Neighborly Software, to analyze data procured from consumer feedback efforts to identify problem areas with program reporting. This system will also provide insight into the realization of benefits as the program advances.

38. Explain how the state will measure and evaluate the success of its quality assurance/quality control systems.

The state will measure and report against targets such as the number of open tickets, frequency of data errors, and system performance metrics on a monthly basis. These indicators will provide the state with insights into program success rates and signal areas of improvement.

The state will continuously monitor and evaluate to ensure continuous improvement and oversight to mitigate fraud, waste, and abuse.

39. Describe how the quality assurance/quality control systems will inform program improvements.

The state will define, manage, and follow program improvement processes in conjunction with leadership, program implementers, and applicable parties.
Subject matter experts will analyze findings within the sections Data Review and Consumer Feedback to be shared on a quarterly basis.

Program implementers and other third parties will be required to acknowledge, evaluate, and provide a status on applicable improvement items.

Program improvements will be managed, quantified, and prioritized according to a defined assessment criterion.

40. **Document roles and responsibilities associated with how the state will monitor the program's budget and financial performance to ensure that funds are being used efficiently and effectively.**

In terms of ensuring that administrative limits are maintained, the state will closely track and report spending quarterly at a minimum. The state has assigned BDO and AECOM the responsibility of governing and monitoring the program's budget and financial performance to ensure that funds are being used efficiently and effectively.

Program limits/budgets will be communicated to participants ahead of time and at regular intervals to give direction on how market actors and customers can continue to be supported if/when program funds are exhausted. The state will leverage the DOE approved Budget Allocation Calculator in addition to following Generally Accepted Accounting Principles (GAAP) and conduct a comprehensive audit yearly.

WVOE has implemented a multi-tiered comprehensive review protocol to safeguard financial integrity. Each invoice and payment undergoes meticulous review by a minimum of 4 parties before receiving approval for payment.

41. **For rebates allocated to low-income renter-occupied units, states must distinguish in their plans affordability restrictions and other tenant protections. Confirm that the state will ensure that owners of low-income renter-occupied units abide by the following requirements:**

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

providing tenants with written notice of their rights and their building owner's obligations.

- **Enforcement and penalties are clear and sufficient to act as a deterrent for owner violations and provide for damages and attorney's fees recoverable by tenants.**

☑ The state confirms that it will ensure that owners of low-income renter-occupied units abide by above requirements.

Describe how the state will communicate and enforce the requirements above.

The owner will provide written notice to tenants explaining their rights and the building owner's obligations (e.g., add an addendum to the lease). The state will provide contact information for tenants to notify the state of breaches to this agreement. The state will also include this information in the consumer education campaign, so tenants are aware of their rights under the applicable state law.

Additionally, standardized templates have been creating, outlining tenant rights and protections, landlord responsibilities and expectations: all parties are required to sign and acknowledge before work begins.

42. **Describe how the state will review the Fraud, Waste, and Abuse Mitigation Plan at least every two years, adjust based on lessons learned, and communicate changes to contractors, aggregators, third-party inspectors, and DOE.**

Note: According to best practices, documenting the assessment of risk allows states to re-evaluate the risks to its programs and respond accordingly when the environment changes. DOE recommends aligning Fraud, Waste, and Abuse 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.

The state will review and update the Fraud, Waste, and Abuse Mitigation Plan at least every two years to assess and strengthen effectiveness, based on lessons learned. Program implementers and quality assurance subject matter experts will analyze findings with the Consumer Feedback, Resolution Procedures, Data Review, and Continuous Improvement sections to be shared on a quarterly basis.

Program implementers and other third parties will be required to acknowledge, implement, and provide a status on applicable, updated controls to mitigate fraud, waste, and abuse.

Fraud, Waste, and Abuse Mitigation Plan improvements will be managed, quantified, and prioritized according to a defined assessment criterion based on risk assessments and associated program design, data security, and privacy security mitigation measures. WVOE will utilize a centralized, multi-channel data aggregation framework to systematically capture, catalog, and evaluate all program performance and compliance data. Quality assurance and oversight findings, including desk audits, onsite inspections, and virtual inspections, will be digitally logged directly into a secure program management database to track field compliance trends in real time. Concurrently, consumer and stakeholder feedback will be streamlined by leveraging an automated ticketing system. This system will ingest inbound communications from the dedicated program hotline, web portals, and email inquiries, automatically converting them into categorized, trackable support tickets. By consolidating these qualitative stakeholder inputs with quantitative inspection metrics into a single reporting repository, WVOE ensures a comprehensive, auditable, and continuous quality assurance loop that meets all Department of Energy oversight, risk mitigation, and reporting mandates.

The state will provide contractors, aggregators, third-party inspectors, and DOE with updates on updated controls, improvement opportunities, and the FWA Mitigation Plan quarterly.