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# Essential Consumer Protections in IRA Home Energy Rebate Programs



National  
Consumer Law  
Center  
*Fighting Together  
for Economic Justice*

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# About NCLC

- Since 1969, the nonprofit National Consumer Law Center® (NCLC) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, including older adults, in the U.S.
- NCLC's expertise includes policy analysis and advocacy; consumer law and energy publications; litigation; expert witness services, and training and advice for advocates. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state government and courts across the nation to stop exploitative practices, help financially stressed families build and retain wealth, and advance economic fairness.

# Roadmap

- Summary of IRA Rebate Programs
- Program Design Recommendations
- Tenant Protections
- Consumer Protection Best Practices

# IRA Rebate Programs

- On Aug. 16, 2022, President Biden signed the landmark [Inflation Reduction Act](#), which provides nearly \$400 billion to support clean energy and address climate change, including [\\$8.8 billion](#) for the Home Owner Managing Energy Savings (HOMES) Rebates Program or Home Efficiency Rebates Program (IRA Sec. 50121), and the High-Efficiency Electric Home Rebates or Home Electrification and Appliance Rebates (HEEHRA or HEAR) Program (IRA Sec. 50122).
- The U.S. DOE estimates these rebates will save households up to \$1 billion annually on energy bills and support over 50,000 U.S. jobs.
- The rebate programs run through 2031.

# HOMES Program

- The HOMES energy performance-based, whole-house rebates provide rebates for:
  - Energy efficiency retrofits from \$2,000-\$4,000 for individual households and up to \$400,000 for multifamily buildings.
  - Up to \$2,000 for retrofits reducing energy use by 20 percent or more, and up to \$4,000 for retrofits saving 35% or more (\$4,000 and \$8,000 for low-income households (below 80% AMI)).
  - States can increase maximum rebates for low-income households up to 100% of project costs.\*

\* *More on this later.*

# HEEHRA or HEAR Program

- **High Efficiency Electric Home Rebate Act (HEEHRA) or Home Electrification and Appliance Rebates (HEAR)**, includes \$4.5 billion in direct rebates for low- and moderate-income households.
- For low-income households, HEEHRA/HEAR covers new, efficient electric appliances, providing low income households rebates of up to \$14,000, covering:
  - Energy Star electric heat pump installation for space heating and cooling, up to a cap of \$8,000;
  - Energy Star electric heat pump water heater, up to \$1,750;
  - Energy Star electric stove, cooktop, range or oven or Energy Star electric heat pump clothes dryer, up to \$840, and
  - Up to \$4,000 for an upgraded breaker box, \$2,500 for upgraded electrical wiring, and \$1,600 for insulation, ventilation and sealing.
- For moderate income households, the same rebates are available to cover 50% of the costs.
- DOE estimates the program will allow roughly one million low- and moderate-income households to go electric.

# Home Energy Training Grants

- State-Based Home Energy Efficiency Contractor Training Grants makes \$200 million available to state energy offices to train, test, and certify residential energy efficiency and electrification contractors.
- States can partner with nonprofit organizations to develop and implement these programs that will prepare contractors and their employees to bring clean energy technologies into homes.
- States can put contractors to work who are trained through this program by connecting them with projects funded by the Department of Energy's [Home Energy Rebates Programs \(HOMES and HEEHRA\)](#), which provide rebates to eligible residents for retrofits and appliance upgrades that reduce energy use.

# Key Features in the Rebate Programs

- HEAR rebate has a Point of Sale feature that functions as an immediate discount through the contractor or retailer.
- States can structure HOMES rebate to result in a purchase price reduction.
- Programs include a contractor incentive (\$200) for work in disadvantaged communities.
- Statute prohibits combining rebates with other federal grants/rebates for the same measure/upgrade.
- Solar is not included in the IRA rebates programs.
- IRA rebates are not treated as income.

# Illinois Allocations

- **HOMES** rebate program: \$132,219,190
- **HEEHRA** program: \$131,452,470
- **Total:** \$263,671,660



# Affordability Matters!

- Prioritize participation in rebate programs to those who need it most (see zip code level data).
- Prioritize low-income populations and improving affordability in the framework of both programs.
- No unintended consequences! (Don't leave a financially struggling customer with expensive financing and higher bills.)

# Critical Issues

- What best practices should states follow to ensure efficient, zero-cost delivery of weatherization and electrification measures to low-income customers in particular?
- What consumer protections are needed to ensure utility customers aren't left to navigate rebate opportunities on their own?

# Definition of Low- and Moderate-Income Households

## DOE IRA Rebates Guidance Defines

- a low-income household as a household with an income below 80% AMI;
- a moderate-income household as a household between 80% - 150% AMI;
- a low-income multifamily building as a building with at least 50% of households with income less than 80% AMI, and
- a moderate-income multifamily building as a building with at least 50% of households with income less than 150% AMI.

# Program Design Recommendations

- **Braid and stack HOMES AND HEAR/HEEHRA rebate opportunities with existing state weatherization and utility ratepayer-funded energy efficiency programs.**
  - Maximize investment in low-income homes so that families are not asked to finance measures
  - Sequencing matters! Ensure electrification measures are right-sized by investing in weatherization measures first.
  - Ensure communication and data sharing among parties and partners.

# Program Design Recommendations

- **Protect the customer from fraud, confusion and release of sensitive personal data.**
  - Protect consumer privacy by ensuring sensitive customer billing and income information is protected and secure.
  - Prohibit door-to-door customer acquisition actors and high-pressure sales practices.
  - Don't leave customers to navigate programs on their own.

# Program Design Recommendations

- **Promote iterative program design. States should plan on improving the two rebate programs over time.**
  - **Rebate programs available until September 30, 2031.**
  - **Data collection is key.** Advocates should champion meaningful transparency, including publicly available analysis and reports as well as regular release of raw data to track changes over time.
  - **Complaints and resolution data as well as consumer survey data should also be available to stakeholders.** This information is particularly helpful to identify aspects of rebate program design and implementation that should be improved.

# Program Design Recommendations

- ***Establish an Advisory group.*** Advocates should recommend that states establish a state energy rebates program advisory group with representation from **low-income consumer advocacy and tenant groups**. These groups should have access to the data in real-time and have the ability and authority to make recommendations that must be considered regarding implementation improvements (e.g., better targeting of rebates) and consumer protections.



# Program Design Recommendations

- **Establish funded navigators.** Low- and Moderate- Income (LMI) consumers, in particular, will benefit from trained navigators to help guide them through the sequencing and stacking of rebate program measures with existing weatherization, energy efficiency, rehabilitation programs, etc.
- **The rebate program rules forbid combining federal grants and rebates for the same measure, so coordination with the state's Weatherization program will be critical.**
- **Independence.** Navigators should be independent from the contractors implementing the energy programs.
- **Navigators should help consumers select the measures, projects and programs that best meet their needs, help consumers enroll in applicable programs, and serve as a case manager as the homes undergo the work.**
  - State Energy Offices should identify funding sources to pay for energy program navigators (e.g., experts with federal Weatherization and state energy efficiency programs).
  - Whether these navigators are housed in the rebate programs or another energy program is less important than making sure that these navigators are independent and are focused on the best interest of the household.
- **Community outreach and language access.** States can use a portion of their IRA Home Energy Rebates administrative budgets for outreach and education. The navigators could also play this role. Navigators and community-based organizations can also play a key role in ensuring Limited English Proficiency needs in the community are met.

# Program Design Recommendations

## 1. States should increase the set-asides for low-income households and low-income multifamily housing beyond the minimums established by DOE.

### ➤ *DOE Guidance.*

- The DOE Guidance discusses the importance of ensuring low-income households benefit from these home energy rebates.
- The Guidance requires each state to dedicate a minimum allocation for low-income households and low-income multifamily housing.
- The DOE guidance provides states with the ability to go further and increase the amount of rebate funds set aside for low-income households.

### **Recommendation: Regarding the low-income multifamily housing, states should:**

- **prioritize opportunities to preserve existing affordable housing, such as expiring Low-Income Housing Tax Credit properties, for the long term, and protect tenants from rent increases and displacement and**
- **dedicate resources to reducing health hazards in the home, such as the removal of gas appliances.**

# Program Design Recommendations

2. **Cover 100% of low-income project costs in HOMES.** Congress expressly permits states to increase the amount of the HOMES rebate for low- or moderate-income (LMI) households beyond the floor established by DOE. The DOE Guidance rationale for states to increase the HOMES rebate up to 100% of project costs for these LMI households is “to allow for meaningful retrofits of low-income homes.”

- ***DOE Guidance.*** Under the HOMES statute and DOE Guidance, states can ask the Department of Energy for permission for the HOMES rebate to cover up to 100% of project costs for low- or moderate-income households.

***Recommendation.*** Advocates should use this discretion in the IRA HOMES program to press for the maximum for project costs (100%) for low- (and depending on the needs of the community, moderate-) income households.

# Program Design Recommendations

3. **Expand covered measures and rebate amounts.** Braiding and stacking can lead to deeper, more comprehensive investments in low- (and moderate-) income housing. States can choose which measures to cover and the amount of the rebate (up to the statutory caps) for the HOMES and HEEHRA rebate.

- ***DOE Guidance.*** States have the flexibility to set the rebate amounts below the statutory caps and to offer less than the full suite of covered measures. For example, a state may set the per household rebate amount limits, limit the technologies covered, choose not to allow the HEEHRA rebate for gas appliances, or limit the HOMES rebate to building envelope measures.

***Recommendation.*** The low-income advocates familiar with the utility efficiency and federal weatherization programs should provide recommendations on prioritizing and incentivizing the measures and rebate amounts that can be braided and stacked with the existing energy assistance programs in the state (e.g., low-income Weatherization) and with particular utility programs).

# Program Design Recommendations

4. **Maximize use of categorical eligibility**. One way to make it easier for low-income households to apply for the state rebate programs is to use household participation in another means-tested federal assistance program as proof of eligibility for the rebates program (referred to in this resource as “Categorical eligibility”).

- ***DOE Guidance expressly permits categorical eligibility.*** To facilitate the state use of categorical eligibility, DOE has prepared a detailed [list](#) of programs that are approved for categorical eligibility for the states’ rebate programs.

***Recommendation.*** Advocates should support the use of as many programs on the DOE [list](#) as possible to make a household categorically eligible for the state’s rebate programs. A state could design their application so that a household would only have to self-certify that they are participating in one of the categorical eligibility programs (subject to a random audit) to show that the household met the income qualifications of being “low-income.” Ideally states would be able to enter into inter-agency agreements to cross-check program roles to determine if a household is participating in a pre-qualifying program.

# Program Design Recommendations

**5. Pilot measured savings for the HOMES rebate.** States can design their HOMES rebate to use “measured savings,” “modeled savings” or both to determine the rebate amount. Most states will likely use modeled saving for their existing energy efficiency programs. However, modeled savings risk over-predicting savings. This shifts the risk of materialized energy savings to the homeowner.

- **DOE Guidance.** The DOE Guidance § 3.1.2.2 for the measured energy savings requires use of DOE-approved open-source measurement and verification (M&V) to measure savings post-installation. Rebate amounts under the measured approach are based on reported savings using the M&V software, household income level, total project cost and home type (e.g., single-family). The DOE Guidance § 3.1.2.1 for modeled energy savings requires use of home energy models consistent with the BPI-2400 standard. Rebate amounts are based on estimated energy savings for completed improvements, household income level, total project cost and home type.

**Recommendation.** The HOMES rebate program provides an opportunity for a state that uses modeled savings to pilot a measured savings approach.

- States that currently use modeled savings for rate-payer funded energy efficiency programs could use their modeled savings approach to more quickly implement the HOMES program and to braid and stack the HOMES rebate with existing Weatherization and ratepayer-funded energy efficiency programs that use a modeled savings approach.
- At the same time, those states could also start a pilot HOMES rebate program that uses the measured savings approach, with guaranteed protection against any cost increases, as a way to test this alternative design.

# Program Design Recommendations

**6. Develop strong state community benefits plans. Each state home energy rebates plan must include a Community Benefits Plan.** The Community Benefits Plan is where advocates can insist on meaningful participation, strong workforce development and engagement, and a meaningful flow of benefits to underrepresented groups and disadvantaged communities.

- **DOE Guidance.** The Community Benefits Plan must include: how the state will engage the community and workforce; how the state will support a qualified workforce; how the state will describe efforts to address diversity, equity and inclusion objectives; and how the state will ensure that benefits will flow to disadvantaged communities per the Justice40 Initiative.

**Recommendation.** Advocates should view the Community Benefits Plan as a vehicle for ensuring true stakeholder engagement. Many of the recommendations in this guidance (e.g., expanding the allocation for low- and moderate-income households and streamlining eligibility determinations through the use of categorical eligibility) are modest ways to help the benefits of the rebates flow to disadvantaged communities. Programs can build accountability through transparency of the data and stakeholder working groups. The working groups will be in a position to see how the program is performing in real-time and offer mid-course improvement suggestions and program design modifications that can lower barriers or increase access for certain under-represented communities.

# Tenant Protections

1. **Protect tenants from Rent Increases and Displacement.** States should ensure that all tenants in affected properties are protected from displacement, no-cause eviction, and rising rents when property owners receive resources as a result of IRA funding.
  - **DOE Guidance.** States are required to ensure that landlords do not evict a tenant to obtain higher rent based on IRA-subsidized improvements. The property owner must also agree not to increase the rent of any tenant of the building as a result of the energy improvements, with the exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.

**Recommendation.** Advocates should insist that landlords of a property with IRA-subsidized improvements may only evict a tenant for good cause related to material breach of the lease or rental agreement. To ensure the enforceability of such protections, landlords should be required to provide notice to the current tenant or any subsequent tenants of the receipt of IRA subsidies and accompanying tenant protections.

# Tenant Protections

**2. Preserve Affordable Rental Housing.** Rental property owners receiving IRA funds should have to maintain or extend affordability for a designated period of time, based on the level of funding received.

- **DOE Guidance.** States are required to ensure landlords rent affected dwelling units to low-income tenants for the two years following receipt of the rebates. The Guidance further requires property owners to agree that if the property is sold within two years of receipt of the rebates, the tenant protections apply to the new owner and must be part of the purchase agreement.

**Recommendations.** To preserve affordable housing, states should prioritize opportunities to preserve existing affordable housing, such as **Low Income Housing Tax Credit properties, for the long term.** When possible, affordability should be maintained or extended for longer than the two-year minimum period in the DOI guidance when a property owner receives a substantial investment of federal dollars.

- i. To ensure the enforceability of these provisions, states should require property owners to notify the state if a tenancy is terminated or if the property is sold. Property owners should provide a copy of the purchase agreement verifying the requisite provisions have been included. In the event the property owner fails to comply, the property owner must refund the rebate.

# Tenant Protections

**3. Provide Additional Protections for Renters in Federally Supported Low-Income Housing.** To keep subsidized housing affordable for low-income households, federal law for most federally assisted housing programs limits tenants' rent contributions. The tenant rent contribution in these programs includes both shelter and the costs for a reasonable amount of utilities. Where utilities are tenant-paid, a tenant is entitled to a "utility allowance" to cover reasonable utility costs. If utility allowances are lowered based on decreases in utility charges following IRA-subsidized improvements, the tenants may not receive any financial benefit from the use of IRA funds.

- **DOE Guidance.** No guidance on protections for tenants in subsidized housing. Federal regulations generally govern the setting of utility allowances in federally supported housing, although additional guidance may be found in HUD guidebooks. The applicable regulations vary depending on the type of housing subsidy involved.

**Recommendation.** Tenants in subsidized housing must retain the same or better rights and protections they enjoyed prior to the infusion of IRA resources into their properties. Tenants in subsidized housing should be able to retain the utility allowances they had prior to the IRA-related improvements.

Because project owners are best financially positioned, especially with the infusion of these funds, to pay directly for building utility costs, where utilities are master metered, states should require owners to retain the master meter model. Low- and moderate-income tenants in particular should not have to pay utility costs directly, which only increases their housing insecurity. For existing individually metered properties, owners should be required to demonstrate that all tenants will directly financially benefit from the proposed project.

# Tenant Protections

## **4. Ensure the Enforceability of Tenant Protections. States must include robust enforcement mechanisms in their IRA programs to ensure that IRA rebates do not spur gentrification, unnecessary rent increases (as discussed above), displacement and loss of affordable units.**

- **DOE Guidance.** The Guidance includes the following requirements to ensure enforceability: (1) In the event the owner does not comply, the owner must refund the rebate. (2) A specific and verifiable mechanism (e.g., addendum to the lease) must be in place that provides tenants with written notice of their rights and their building owner's obligations. (3) 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.

### ***Recommendation.* Compliance with tenant protections should be an explicit condition of the receipt of IRA funds.**

- i. States should require landlords to publicly disclose that they have received a rebate for the IRA-subsidized improvements to the rental property and post a notice in the common area of the property to make tenants aware of their rights and of the landlord's obligations.
- ii. For substantial IRA investments, limits on rent increases and no-cause evictions and affordability restrictions should be included in a recorded use agreement enforceable by the tenants so that any purchaser of the property is on notice of the applicable protections.
- iii. Tenant protections should be incorporated into residential leases through lease addendums that are enforceable by the tenants.
- iv. To enforce affordability requirements, states should require property owners who receive IRA rebates to provide notice if a tenancy is terminated and certify that any new tenants meet the income qualifications throughout any required affordability period.

# Other Consumer Protections

1. **Publish a Qualified Contractor List.** The state should publish and maintain a list of vetted and approved contractors.

**DOE Guidance.** The Guidance requires programs to describe how they will develop the qualified contractor list, including qualifications to which contractors will be held, such as (but not limited to): home performance industry credentials, training requirements, business insurance and licensure, skills standards and labor standards.

- i. The State's Consumer Protection Plan must also describe the process by which contractors will be added to the qualified contractor list and what conditions would lead to a contractor being delisted. The qualified contractor list is to be made public.

**Recommendations.** The qualified contractors list for both Home Energy Rebate programs should also include a list of qualified retailers and distributor partnerships. For conditions that would lead to a contractor being delisted, consumer protection complaints and violations found in on-site inspections should be a basis for delisting a contractor. Other instances in which contractors should be delisted are provided below.

# Other Consumer Protections

**2. Direct low-income households to the no-cost programs. Leverage and stack federal, state and ratepayer resources to cover the full cost of the project and prioritize the no-cost programs in the layering of funding for low-income households.**

**DOE Guidance.** Low-income households are important populations for the Home Efficiency Rebates. IRA Section 50121 provides larger rebates for single-family homes occupied by low-income households (below 80% AMI) and allows states to request authority to provide even larger rebates – up to 100% of project costs – to allow meaningful retrofits of low-income homes. States are strongly encouraged to design their rebate programs in ways that allow for effective combinations of various funding sources, including through integration with existing programs.

**Recommendations.** As outlined above, states should provide 100% coverage of program costs for low-income households. If that cannot be achieved, programs should inform consumers that there are other federal programs that provide no-cost efficiency measures for low-income consumers (e.g., federal low-income Weatherization and Low-Income Home Energy Assistance Program (“LIHEAP”) funds can be used for low-cost measures). All outreach, contracts, and informational materials should emphasize the availability of the no-cost programs for low-income households and how to get more information.

# Other Consumer Protections

**3. Support Strong Contract Provisions. Contracts must not contain mandatory arbitration clauses. Ensure inclusion of [the holder-in-due course rule](#) so consumer protections are not lost just because the contract is assigned to a third party creditor.**

*DOE Guidance.* Contracts should not contain mandatory arbitration clauses and must ensure inclusion of the holder-in-due course rule so consumer protections are not lost just because the contract is assigned to a third party creditor.

***Recommendations.* Currently these protections are only included in the resolution procedures, but states should report compliance with these provisions, e.g., in consumer complaint data and monitoring contractor compliance.** Contractors should also be required to provide their form contracts prior to being added to the verified contractor list and should only be added to the list if their form contracts comply. Compliance with these requirements could also be monitored in the consumer feedback. If it is determined later that a contractor has included a mandatory arbitration clause or has left out the required holder-in-due provision course provision, the contractor should be delisted from the verified contractor list.

# Other Consumer Protections

## **4. Include Protections for Electronic Signatures and Electronic Records.**

**Ensure that when the agreement and the required disclosures are provided to a consumer on an electronic device, and when the consumer's signature is applied electronically, that all requirements of the Electronic Signatures in Global and National Commerce Act (E-Sign Act) are met.** These include requiring 1) that the consumer provide consent to receive the electronic records in a manner that clearly demonstrates the consumer can access the electronic records, and 2) the electronic process used to signify the consumer's signature is attached to an electronic record that the consumer actually intended to sign.

***DOE Guidance.*** As part of the independent onsite post-install inspections protocol, it is required that the inspection ensure compliance with all requirements of the E-Sign Act and prohibits the use of electronic devices and signatures to enter into the contract if not E-Sign compliant. The Guidance further states in footnote 43, "a written copy (in the person's primary or secondary language) should be provided even if there is also an electronic contract . . . ."

***Recommendation.*** To align the above guidance with the requirements of the E-Sign Act, states should require that a separate 8" by 11" paper version of the required disclosures in at least 12 point font be provided to consumers in advance of the consumer being asked to sign a contract.

# Other Consumer Protections

**5. Require energy audits.** Energy audits provide homeowners with an objective assessment of their home's energy options before expensive energy upgrades are installed, or an inspection after installation to confirm that promised savings will be realized.

**DOE Guidance.** States may request to use a portion of rebate funds for these project-related costs. For example, utilities, third-party organizations, or agencies may provide funding for home energy audits. DOE will provide assistance to states specifically in support of identifying program implementation cost reductions. i. An assessment is required for every single-family home and multifamily building receiving Home Efficiency Rebates. IRA Rebates Guidance at 32. However, the Guidance does not require a cost-benefit analysis. A cost-benefit analysis would include an analysis of available energy consumption records to validate estimates of energy savings from the installed home performance upgrades and a projected site energy savings associated with the recommended home performance upgrade package(s).

**Recommendation.** An independent energy auditor should confirm the need for the work and the expected benefits/savings before the consumer enters into any contract. After the work has been done, there should be an independent quality control inspection before the contractor is paid in full (includes verifying the permits were finalized and work was done as per the contract).

# Other Consumer Protections

## **6. Establish Resolution Procedures and a Restitution Fund. There should be a quick and easy complaints procedure and immediate investigation of complaints.**

**DOE Guidance.** Resolution procedures must include: (1) a written conflict resolution procedure that documents how disputes will be resolved between homeowners and contractors, or aggregators, that includes protocols for a timely response; identification of responsible parties; documentation of corrective actions, including the financial benefits resulting from the corrective action for the complainant; and a means of identifying and addressing systemic issues; (2) a remediation process to ensure that when deficiencies are detected through the inspection process, these results are communicated to the responsible party and any remedial or punitive actions taken follow a predefined set of protocols, which must be described in the plan; and (3) a requirement to maintain records on quality control inspections, including sampling rates, findings, corrective actions taken, and verification of conformance to requirements.

**Recommendation.** To ensure easy access there should be a button on the home page of each state's program that takes consumers to where they can file a complaint with the appropriate agency; easy-to-understand instructions for submitting a complaint; and information about how to find an attorney, including free legal help for those who qualify. State agencies can help regarding consumer complaints (e.g., state energy office, ratepayer advocate, contractor licensing board and/or financial regulatory agency, if applicable). There should also be an adequately funded restitution fund since the terms of many of these contracts could run for 20 years, and contractors could disappear or go bankrupt.

# Other Consumer Protections

**7. If the state plan allows for financing of improvements, the program must establish a strong Ability-to-Pay requirement that excludes measured savings. If financing is involved, states should require an ability-to-repay determination that does *not* include projected savings from an energy report because expected savings may not materialize due to household variability and market developments. Measures should be adopted to protect against fraud and abuse.**

*DOE Guidance.* Ensure an ability-to-repay determination that does not include projected savings from an energy report because they may not materialize due to household and market developments.

## ***Recommendations.***

- 1. Programs should prohibit contractors from selling the financing for these projects.**
- 2. Ability-to-pay analyses should be completed by an independent third party to ensure any consumer agreeing to home improvement work has the ability to pay for the improvements up front and wait for a rebate to be issued later.**
- 3. To the extent contractors are ever used to perform ability-to-pay determinations, they should be trained in how to complete such determinations, and the states should review the contractors' determinations to ensure they are completing them correctly and in good faith.**
- 4. Consumers should be screened for eligibility for other programs such as the LIHEAP, ideally by an independent third party; to the extent contractors are involved, they should be trained about the available programs and their eligibility criteria.**
- 5. There should be confirmation from an independent entity that the consumer understands the contract and wants to proceed (using open-ended Questions versus leading or Yes/No).**

# Questions?

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