Updated October 28, 2026

Home Energy Rebates Programs:
Law 2022 vs. Requirements/Recommendations 2024 vs. Program Notices 2026

On June 1, 2026, DOE released new Home Energy Rebates Program Notices to all state energy offices. These Program Notices[1] describe updates to the Rebates program guidance documents to incorporate new policy direction from the Trump Administration and, based upon industry feedback, streamline the prior rebate program guidance in certain areas. While these Program Notices are not themselves the updated guidance, DOE states that they intend "to publish revised program guidance documents to further detail these changes in the near future." DOE released further Frequently Asked Questions document in August and September 2026, and the Pacific Northwest National Laboratory (PNNL) continues to release various technical updates to the rebate reservation tool and procedures.

The prior guidance released by DOE throughout 2023 and 2024 was established to promote best practices and fill gaps in the underlying statute, which was passed by Congress via budget reconciliation and which required removal of many of the provisions and requirements in the originating bills[2]. Though many of these added requirements were well-intentioned, taken in sum, they have at times overwhelmed state energy offices (particularly smaller offices), program implementers, and participating contractors. The new guidance released by the Trump Administration offers the opportunity for states to revise and streamline their program plans – though additional opportunities for further streamlining program execution likely remain. The new guidance also applies new policy priorities and requirements, and states will need to adjust their program designs to incorporate these new requirements.

Included in the Program Notices are official updates to the names of the rebate programs, to align with the statutory names found in Sections 50121 and 50122 of the IRA. The HOMES program, formerly the "Home Efficiency Rebates," will now be the "Home Owner Managing Energy Savings" program. Similarly, HEEHR will be changed from the "Home Electrification and Appliance Rebates" (HEAR) to the "High-Efficiency Electric Home Rebates." The table below compares the program requirements, as established in statute, to the requirements and recommendations established by prior DOE guidance and the latest DOE guidance release. DOE states that "all other program requirements" for the Rebate programs shall "remain in effect with the exception of those identified in [these] document[s]." Thus, any requirements established in DOE's December 2024 guidance (v2.1) not overridden by the Program Notices as described below remain in place.

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[1] Newly released documents include Program Notice 26-1 (HOMES), Program Notice 26-2 (HEEHR for States and territories) and Program Notice 26-3 (HEEHR for Indian Tribes). Collectively, these documents modify previous guidance contained in the program Administrative and Legal Requirements Document (ALRD) version 2.1 (version 2 for Tribes), Program Requirements & Application Instructions (PR&AI) version 2.1 (version 2 for Tribes), and the Data & Tools Requirements Guide version 2.0.

[2] HOMES and Contractor Training Grants were in the HOPE for HOMES Act, H.R. 3456 / S. 1768; HEAR began as part of HOMES and the Zero Emissions Homes Act, H.R. 4872 / S. 2370.

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HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Overarching Program Requirements – HOMES and HEEHR				
Set rebate maximum values.	X	X		**No change**
Prohibition on combining rebates with other federal grants/rebates for the same measure.	X	X		**No change**
Maximum of 20% of funds spent for program administration.	X	X		**No change**
Funding distributed in multiple tranches; December 2024 ALRD decoupled tranches from performance milestone pre-approval by DOE.		X		**No change.** If states do not receive a written notification of approval to launch from the Project Officer within calendar 30 days of DOE feedback on the submission of final State Implementation Blueprint documents, the Grantee may proceed to launch.
Multifamily buildings: Prohibits rebates that benefit the non-residential portion of a mixed-use building and limits the definition to an individual building.		X		**Provides additional flexibility to allow upgrades to mixed-use areas**, provided that a majority of the benefit resulting from central system upgrades completed within a mixed-use building, including energy savings, cost savings, or other health and safety benefits, is to the residential portion of the building; states may allow multifamily common area if they benefit occupants through energy savings, cost savings, or other health and safety benefits. Also **expands the definition of multifamily buildings to also include multiple buildings (e.g., apartment complexes).**

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Tenant protections: two-year prohibitions on rent increases/evictions, carry-over to subsequent owners.		X		FAQs require that if a landlord receives a rebate for an income-qualified tenant unit, in addition to the prohibition on rent increases, must also ensure that any new tenant within the two-year period must also meet the income eligibility requirement. [Note: the FAQs characterize this requirement as a low-income tenant protection, and therefore it does not apply to moderate-income eligibility under HEEHR.]
Eligible Measures and Rebate Payments				
HEEHR: ENERGY STAR for applicable appliance categories.	X	X		**No change**; still required in statute
HOMES: ENERGY STAR for HVAC and Water Heating.		X [exceptions for MF building equipment with no applicable certification]		**No longer required**; up to state discretion.
HEEHR: Fuel Switching (replacement of nonelectric appliances)	Allowed	Allowed		**Removal of existing fossil systems is no longer allowed with rebate dollars.** Consequently, gas stoves, gas dryers, and gas water heaters cannot be replaced using an electrification rebate. The program notice allows HVAC/appliance electric-to-electric upgrades, and, if the fossil HVAC system remains (dual-fuel or supplemental heating) a heat pump rebate can be utilized. The PNNL rebate reservation system requires an attestation that rebate dollars were not used to remove the existing fossil fuel HVAC systems. While the PNNL documentation implies that concurrent removal with non-rebate funding is therefore possible, the PNNL documentation alone does not constitute guidance at the same level as DOE issued program notices, and states may choose different implementation strategies.

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
				Per DOE, if any grantee has remaining funding after fully implementing their new program design, then DOE will consider allowing additional measures authorized by statute.
HEEHR: Heat Pump Primary Heating/Cooling Requirement		X		**No longer required**. Allows heat pump installations, **even if the heat pump will not become the primary source of heating and cooling.**
HEEHR: Insulation/air sealing before HVAC			X	Now **requires** homes to use insulation and air sealing rebates **in conjunction with** installing heating and cooling equipment – unless the home is already insulated and air sealed to a DOE-approved, state specified level. Insulation assessment and installation may be allowed **after** the heat pump installation, in accordance with state plans approved by DOE.
HEEHR: Do-It-Yourself	Allowed	Allowed for all HEEHR products except heat pumps, air sealing, electrical wiring, and electrical load service centers		Officially **encourages** states to pursue **retail** pathways (e.g. e-commerce, direct-to-consumer, marketplace vendors) and **do-it-yourself** retail purchases as long as DIY installations are allowed by state and local building codes. Maintains the prohibition on do-it-yourself HVAC. Specifically allows: 1. Third party installers to perform DIY installations (not required to be listed on the qualified contractor list, reasonable installation costs can be covered) 2. Mail-in Rebates If installations conform to state and local building codes, and have a point-of-sale option, DOE requirements now allow DIY and mail-in rebates for all HEEHR products except heat pumps - suggesting new eligibility of DIY air sealing, electrical wiring, and electrical load service centers.

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HEEHR: Combination ENERGY STAR washer-dryers allowed			Allowed per Biden DOE FAQs (2024)	Officially included in 2026 DOE guidance.
HEEHR: Incremental rebates for insulation, air sealing, ventilation, or electrical wiring projects			Allowed per Biden DOE FAQs (2024)	Officially included in 2026 DOE guidance; reaffirms prior FAQ to allow households to claim rebates for **insulation, air sealing, ventilation, or electrical wiring projects incrementally**, up to the maximum rebate amounts for those projects ($1,600 for insulation/air sealing/ventilation; $2,500 for electrical wiring projects)
Definition of eligible improvements	X	X [further definitions]		**Expands rebate funding eligibility to include product shipping** and **contractor travel** costs for territories, AK, and HI, allowing usage of rebate funds **to include warranties or accessories** necessary for the base installation and operation of the retrofits, and allowing rebate funds to **cover appropriate state or local taxes.** This codifies previous FAQs.
HOMES: Partial Payments for Rebate projects			X [Multifamily only, with DOE approval]	Expands eligibility for **partial payments to include single-family retrofits, including for measured and modeled pathways,** with DOE approval. Clarifies that rebates may be assigned to aggregators.
Low-Income Requirements and Income Verification - HOMES and HEEHR				
HOMES: Higher rebates for lowincome households.	X	X		**No change**

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
HEEHR: Low- and moderate-income eligibility requirements.	X	X		**No change**
Manual review of every income verification application.		X		**No change**
Reporting and auditing of falsification by census tract and categorical eligibility, self-attestation.		X	X	**No change**
Manual follow-up audit on 100% of self-attestation applications prior to issuing rebate.		X		**No change**
HOMES and HEEHR: Low-income funding requirement of ~40% and low-income multifamily requirement of 10%.		X		**Partially Removed. The 10% multifamily requirement remains as stated in prior guidance**. The 2026 Program Notice refers to removing "the Justice40 Initiative requirement for reserved allocations of 40% funding for low-income households;" However, previous ~40% low-income requirement was set at the individual percentage of low-income households in each state and was a separate requirement from the Justice40 requirement.
HOMES AND HEEHR: Justice40 requirement for 40% of funding to Disadvantaged Communities.		X		**No longer required.**

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Energy Modeling and Home Assessments				
HOMES: Energy modeling consistent with BPI-2400 for modeled energy savings.	X	X		Add **exceptions** for onsite generation and net-metering and for **single-family homes, in the limited circumstances outlined in the PR&AI, allows for "uncalibrated modeling consistent with BPI-2400 Annex E**" with DOE approval and provided that states propose an alternative approach that provides reliable savings estimates and includes applying a realization rate at the time of program launch, by leveraging existing data or evaluation results. Home Energy Score is preapproved as an uncalibrated model that does not require further evaluation or approval by DOE. The new guidance **does not appear to expand the specific circumstances allowing for an exception from prior guidance (e.g. delivered fuels with incomplete data, less than a year of occupancy, etc.)** – it just expands the methods for dealing with those exceptions**.**
HOMES: Open-source advanced measurement and verification software for measured energy savings.	X	X		**No change**
HOMES: Value savings based on time, location, and greenhouse gas emissions.	X	X		**No change**

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
HOMES: Energy audit of both modeled and measured projects. HOMES Single-family: **Includes 40+ enumerated requirements** as part of contractor process, in HPXML format. 20+ additional data points recommended for modeled projects. HOMES Multifamily: Includes 193 data elements as part of specified BuildingSync process.		X X X	X	**No change**
HEEHR: Limited home assessment for heat pump projects. HEEHR: 18 data points for HVAC (limited home assessments) plus up to 34 additional questions based on measure types.		X X		**No change**
Photo Requirements: Requires geolocated photos of prior equipment for electric appliances (HEEHR) and post-installation photos of major upgrades (HOMES) and installed appliances and applicable products (HEEHR)		X		Removed requirements for post-installation geo-located photos under HOMES program, and has expanded flexibility for geo-located photo requirements under HEEHR program when technical limitations impact the ability to obtain geotagged metadata. Grantees may propose to DOE an alternative approach to pre-installation and post-installation photos that provides assurance of installation.

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Data and Tools Requirements Guidance: Pre-Launch:**13 questions and data requirements** provided to DOE for pre-approval. Project Data Collection: **50+ specified data fields** required regarding project measures, safety testing, and household characteristics and eligibility; 40+ data points required to be provided to DOE. Program Data Tracking and Reporting: Monthly reporting through PAGE of 22 data requirements regarding number of projects completed and funding amounts.		X X X		**Conforming Changes to API.** DOE and PNNL have not yet published an updated Data and Tools Requirements Guide, but have issued various changes to the Application Programming Interface (API) for the PNNL reservation system. These changes primarily implement the requirements of Program Notices. States "should work with DOE and the [PNNL] to implement additional improvements and streamlining efforts for rebate transaction data reporting." **DOE and PNNL could release further updates to the API following state engagement on these topics, and we will update future analysis if/when that happens.** States that do not utilize the real-time API may request a reduced reporting cadence from once monthly to once quarterly after one full year of monthly reporting.
Contractor Incentives				
HOMES: $200 contractor/aggregator incentive for projects in Disadvantaged Communities.	X	X		**Remains; states have additional flexibility in defining "disadvantaged communities."** States may choose one, two, or all three of the statutory factors of "economically, socially, or environmentally" disadvantaged in their definition. For multifamily properties receiving central system upgrades (e.g., variable refrigerant flow heat pumps, central heat pump water heaters), grantees may propose providing a single disadvantaged community incentive per building.

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HEEHR: Up to $500 contractor incentive.	X	X	X [2024 Program Requirements provide specific incentive examples]	**No longer includes $200 disadvantaged community incentive that was in 2024 guidance as part of the $500 contractor incentive.** The overall $500 incentive remains required, per previous guidance; specific appliance amounts are provided as examples in previous guidance. FAQs allow that States may limit these incentives for projects for low-income households, and/or for installations of equipment not commonly installed to encourage contractors to install newer technologies.
Implementation Blueprint: Community Benefits Plan - HOMES and HEEHR				**No Longer Required**
Engage Community and Labor ▪ Hold at least one public input session to solicit community input. ▪ Use the input from these engagement sessions to inform the design of its rebate program, and it must describe how this input was used in its program design. ▪ Explain how it will solicit and respond to community feedback throughout the duration of its rebate program. ▪ Describe what community engagement and outreach strategies it will utilize to reach contractor and workforce organizations, disadvantaged communities, low-income households, and other marginalized groups.		X X X X		**Removed.** Community Benefits Plans are considered a component of the Justice40 requirement, and are therefore no longer required. On the 6/4/2026 webinar, DOE stated that the Community Benefits Plan is no longer required.

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Engage and Support a Skilled and Qualified Workforce ▪ Describe the State's approach to working with responsible contractors and ensuring jobs are of sufficient quality to attract and retain skilled workers. ▪ Describe plans to affirmatively support workers organizing and collective bargaining.		X	X	**Removed.** Community Benefits Plans are considered a component of the Justice40 requirement, and are therefore no longer required. On the 6/4/2026 webinar, DOE stated that the Community Benefits Plan is no longer required.
Incorporate Diversity, Equity, Inclusion and Accessibility (DEIA) ▪ Describe how DEIA objectives will be incorporated into the program. ▪ Describe how the State will partner with underrepresented businesses and training organizations that serve workers who face barriers to accessing quality jobs and/or other project partners to help address DEIA.		X	X	**Removed entirely.**
Justice40 Initiative ▪ Describe the State's definition of disadvantaged communities. ▪ Describe method of encouraging delivery of home efficiency rebates to disadvantaged communities. ▪ Describe how state will ensure that applicable benefits flow to disadvantaged communities.		X X X		**Removed entirely**, with the exception that states must still describe how they will define a disadvantaged community for purposes of qualification for the $200 contractor bonus. States may choose one, two, or all three of the statutory factors of "economically, socially, or environmentally" disadvantaged in their definition.

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Implementation Blueprint: Education and Outreach Strategy - HOMES and HEEHR				**Now Optional**
The Education and Outreach Strategy must briefly describe how states will inform eligible households about the rebate programs. This outreach and education strategy must include: ▪ Outreach partnerships (utilities, local governments, community-based organizations, labor unions, churches, etc.). ▪ Outreach channels (Digital ads, neighbor to neighbor outreach direct mailings, etc.). ▪ Educational materials (website, fact sheets, etc.) ▪ A brief description of planned activities for contractor outreach, such as outreach partnerships (trade organizations, labor organizations, etc.) and outreach channels (website, ads in trade organization publications, etc.) ▪ High-level timeline for executing these programmatic activities. ▪ Estimated budget devoted to outreach and education.		X X X X X X		**No longer required;** optional for states.

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Consumer Protection and Market Transformation - HOMES				
Quality monitoring through certificate of work performed provided to homeowner.	X	X		Clarified that an implementer may "provide the third-party post-installation project certificate, but only if there is no conflict of interest with the installer of the project that is being certified." Also added that "the HOMES Rebate Program **prioritizes the use of the statutory required, third-party certification** as an important element of market transformation in connection with **accurate valuation of the retrofit in the real estate industry**."
Implementation Blueprint: Consumer Protection Plan - HOMES and HEEHR- Re-established as the Fraud, Waste, and Abuse Mitigation Plan				
▪ Programs must execute agreements with participating retailers, distributors, and contractors in which the party agrees to comply with the QA plan and procedures. ▪ States must retain records related to their QA processes and permit access to DOE upon request. ▪ Review Consumer Protection Plan at least every 2 years. ▪ States must require retailers and distributors to allow reasonable returns.		X X X X		**The former Consumer Protection Plan was replaced with a Fraud, Waste, and Abuse Mitigation Plan.** Within this updated framework, DOE removed requirements for internal review plans, customer satisfaction surveys, and additional dispute resolution procedures for both programs, and proof of commission testing and onsite post-installation inspections for HOMES.

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Consumer Feedback: ▪ Process for households to file complaints, concerns, and issues directly to the implementer(s). ▪ Procedures for addressing negative feedback, including how programs will communicate the feedback to affected contractors or aggregators. ▪ Consumer satisfaction survey sent to the household at least 3 months and no more than 6 months after the project's completion date.		X X X		Consumer satisfaction survey **no longer required.**
Resolution Procedures ▪ Written conflict resolution procedure. ▪ Remediation process regarding communication and remedial or punitive actions. ▪ Recordkeeping of QC inspections: sampling rates, findings, corrective actions taken, and verification of conformance to requirements. ▪ Contracts cannot contain mandatory arbitration clauses. ▪ Ensure inclusion of the holder in-due course rule so consumer protections are not lost if contract is assigned to a 3rd party creditor.		X X X X X		Conflict resolution procedures beyond existing state laws and regulations **no longer required.**

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Data Review ▪ Conduct data or file review of all projects that verifies, at a minimum, auditing tools and modeling software data validation controls, collection of required data, contracted scope of work consistent with program requirements, the address of the installation, rebated amount aligns with verified income category. ▪ A requirement that program's implementers retain photos, combustion safety data, commissioning testing. ▪ Records on QC inspections including sampling rates, findings, corrective actions taken, and verification of conformance to requirements. ▪ Training or credentials of the personnel conducting the data/file review.		X X X X		**Removes requirements for post-installation geolocated photos under HOMES program,** and has **expanded flexibility for geo-located photo requirements under HEEHR** program when geotagged metadata is inaccessible due to technical limitations. **Proof of commissioning testing no longer required for HOMES.**
Inspections ▪ Inspection of first 5 jobs and 5% of jobs for each new contractor. ▪ A description of the training, credentials, and/or qualification requirements of independent inspectors. ▪ Inspection protocol that include visual inspection of the site and work conditions		X X X		**Onsite post-installation inspections no longer required for HOMES.** Also updates the definition of a "new contractor" to only apply to newly certified/licensed contractors.

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
verification of installed measures and diagnostic test results, and E-Sign compliance.				
Contractors and Qualified Contractor List ▪ Describe how the program will initially develop the qualified contractor list. ▪ Describe which qualification(s) that contractors will be held to. ▪ Describe the process by which contractors will be added to the qualified contractor list, how the state will perform due diligence on contractor and distributor entities, and how they will prevent illegitimate entities, including expected use of the Treasury Do Not Pay list. ▪ Describe the conditions and process that would lead to a contractor being delisted. ▪ Describe how the State program will ensure energy savings are calculated using allowable methods and how contractors will be alerted to these tools and trained on proper use. ▪ Describe how the State will educate contractors and		X X X X X X		**Reiterates** required use of the U.S. Department of Treasury's "Do Not Pay" database to vet contractors on state Qualified Contractor Lists.

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building owners to invest in envelope improvements before investments are made in mechanical equipment. ▪ Make the qualified contractor list public.		X		
Installations ▪ Identify installation standards, including compliance with local and state laws, permits, codes, and industry standards. ▪ Establish minimum quality installation standards for rebated technologies. ▪ Establish processes to enforce installation standards. ▪ Ensure that sales language and contract language are the same. ▪ Financing: Ensure an ability to repay determination that does not include projected savings from an energy report. ▪ Financing: Ensure a disclosure and cooling off period.		X X X X X X		**No change.**
Continuous Improvement ▪ Identify what proactive steps the State will take to identify fraud, waste, or abuse. ▪ How the State will implement automation to identify		X X		**No change.**

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
problem areas with program performance. ▪ Explain how the State will measure and evaluate the success of its QA systems. ▪ Describe how the QA systems will inform program improvements. ▪ 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.		X X X		
Implementation Blueprint: Privacy & Security Risk Assessment - HOMES and HEEHR				**Now Optional**
DOE Guidance and requirements regarding the Privacy and Security Risk Assessment: ▪ Implementers must implement risk-based security controls, which must include rationale for categorizing the system, method for determining the risk impacts, and risks associated with data sharing. ▪ Security and privacy controls must be reviewed by an independent third party at least once every 3 years.		X X		**No longer required; optional for states.**

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
▪ Implementers must have documented processes in place to monitor and address issues in a timely fashion.		X		
Implementation Blueprint: Utility Data Access Plan – HOMES				**Now Optional**
Utility Data Access Plan requirements in DOE Application Instructions: ▪ Ensure that any data are transferred and maintained safely and securely, using established standards. ▪ Ensure that any parties participating in a program that requires energy consumption data have secure data protection and protocols that demonstrate the capability for a safe transfer of consumer data, including data for individual dwelling units and whole-building aggregate data for multifamily buildings. ▪ Determine which consumer consent processes the State will implement. ▪ Define energy consumption as primary or secondary purpose. DOE Utility Data Access Plan Guidelines **enumerates 30+ specific details and requirements** to be addressed in state plans.	Directs DOE to Develop Guidelines, not the states.	X X X X X	X	**No longer required; optional for states.**
Implementation Blueprint: Market Transformation Plan				

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
The Market Transformation Plan should: ▪ Describe how the State program will enable the market to recognize the value of homes that have been upgraded through the Home Energy Rebates, including at time of sale/rental. ▪ A strategy for aggregating home data from the home assessment (as described in 3.2.1) and/or home certification (as described in section 3.2.5) and making such data available to real estate stakeholders. ▪ Describe strategies for cost sharing, braiding, and/or coordinated financing with potential funders and financiers of home energy upgrades. ▪ Describe strategies for rebate programs to enable new business models in partnership with private capital, demand management, and virtual power plants. ▪ Consider sustainable business models of home energy contractors. ▪ Recommends Market Effects studies as part of Market Transformation Plan.		X	X X X X X X	**Not referenced in updated guidance;** remain in effect as required by v2.1 of the guidance.

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
Program Evaluation and Evaluation, Monitoring, and Verification (EM&V)				
DOE guidance requires information on state EM&V plans, or DOE will conduct external EM&V. Sample Applications and Evaluation Recommendations suggest the following distinct evaluations, reviews, or analyses within the first two years of program initiation: ▪ Evaluability Assessment @ 3 months. ▪ Early Process Evaluation @ 6-12 months. ▪ State review of aggregator performance every 6 months. ▪ Automated or manual analytic assessment and comparison of home assessments across contractors NLT 12 months, as well as ongoing spot checks. ▪ Early Impact Evaluation @ 12-18 months. ● Assessment of modeled vs. actual usage @ 12 months and annually thereafter. ● Assessment of measured vs. modeled project results and measure types @ 12 months and ongoing basis thereafter. ● Assessment of measured results submitted by aggregators compared to		X	X X X X X X X X	States are given **additional flexibility for the implementation of independent program evaluations**, including an extension on when they are required to submit their evaluation plans. States may coordinate with their DOE Project Officers on additional details.

HOMES and HEEHR Program Requirements	Required in Statute	Required by DOE Guidance (2024)	Recommended by DOE Guidance (2024)	Changes to DOE Guidance (2026)
state independent assessment @ 12 months and every 2 years thereafter, as well as evaluation of measured project energy bill comparisons. ● Specific assessments of BPI-2400 exception projects. ▪ Comprehensive Process Evaluation @ 24-36 months. ▪ Comprehensive Impact ▪ Evaluation @ 24 months and every 2-4 years thereafter, including calibrated and statistical analysis for measured, modeled, and HEAR. ▪ Additional Deep-Dive studies.			X X X X	