

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0007909, State: CT, Program Year: 2020)**

This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

**V.1 Eligibility**

**V.1.1 Approach to Determining Client Eligibility**

Provide a description of the definition of income used to determine eligibility

Income means cash receipts earned and/or received by the applicant before taxes but not the exclusions identified in DOE WAP guidance.

Describe what household eligibility basis will be used in the Program

Consistent with DOE's income eligibility regulation CT DEEP uses household eligibility for LIHEAP as the determination of eligibility for DOE WAP services. The definition of "low-income," in accordance with 440.14(b) (9) (xii), that the State of Connecticut (State) has chosen for determining eligibility is at or below 60% of state median income, which income level is at least 200% of the federal poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, and which is the basis for eligibility for assistance under the Low Income Home Energy Assistance Act of 1981. Households with family members receiving benefits from Title IV (TANF) and/or Title XVI (SSI) of the Social Security Act is categorically income eligible.

**Note:** While the State of Connecticut's DOE WAP grantee is the Department of Energy and Environmental Protection (DEEP), the Department of Social Services (DSS) continues to administer LIHEAP in partnership with the statewide community action agency network.

Describe the process for ensuring qualified aliens are eligible for weatherization benefits

Client eligibility is determined/screened concurrent with the client's application for energy assistance benefits (LIHEAP) by the Connecticut Department of Social Services (DSS) and its subcontractors. Generally, since one household member is found eligible for Weatherization services, the presence of one or more qualified aliens (or lack thereof) is inconsequential, provided that income of any qualified alien is counted in household income calculations.

**V.1.2 Approach to Determining Building Eligibility**

Procedures to determine that units weatherized have eligibility documentation

No dwelling unit may be weatherized without documentation of eligibility. At the Subgrantee level, all household income must be calculated per DOE requirements, and income and home ownership must be documented.

**Note:** For further reference please see *CT WAP Operations and Training Manual 2020 - Section 203*.

Describe Reweathering compliance

Since many households have never received services, the state policy documented in the Operations Manual is that re-weatherization should not occur as a routine practice. Homes weatherized with federal funds on or before September 30, 1994, may be re-weatherized. Homes that received federal weatherization services after September 30, 1994, will not be re-weatherized unless the home has been damaged from an act of God and/or a federally declared natural disaster that has occurred post weatherization of the home as per DOE WPN 12-7.

The grantee limits and monitors the number of such dwellings that each Subgrantee may re-weatherize and authorizes re-weatherization on a case by case basis. CT WAP maintains an electronic database of all homes that have been weatherized under DOE WAP on or after October 1, 1994. Subgrantees are provided controlled access to this information for look-back purposes.

**Note:** For further reference please see *CT WAP Operations and Training Manual 2020 - Sec on 203.5*.

Describe what structures are eligible for weatherization

Most dwellings currently being addressed by WAP in Connecticut are single-family dwellings, both owned and rented. The Subgrantee may not refuse to weatherize an otherwise eligible rental property. Weatherization services are to be provided to owner-occupied and rental properties alike with no priority given to either. Applicants

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from households who are renting must be ranked and verified in the same manner as households owning the property in which they reside. Financial contributions are not required of single-family landlords. Unlike with multifamily properties, contributions may be encouraged, but cannot be required of single-family landlords.

**Note:** For further reference please see *CT WAP Operations and Training Manual 2020 - Section(s) 203.1, 203.2, 203.3, 203.9.3, 203.9.4.*

The following information can be found in CT's WAP Operations Manual:

<http://www.ct.gov/deep/lib/deep/energy/weatherization/operations manual final.pdf>

**Describe how Rental Units/Multifamily Buildings will be addressed**

The State of Connecticut, in accordance with 10 CFR Part 440.22(b) (3), has established procedures to ensure that benefits of weatherization assistance in rental units accrue primarily to the low-income tenants residing therein. Connecticut has opted not to include weatherization of shelters in its program.

Landlords shall not increase the rent paid by eligible tenants of a rental unit that has received weatherization services for a period of two years from the date the weatherization work is completed unless the landlord/property owner can document that the increase is due to factors other than the weatherization assistance performed. In compliance with 10-CFR 440.22(b) (3) and 440.22(e), tenants sign and receive a copy of the agreement, and therefore are aware of the conditions of the document. Landlords will also agree to charge the same rent to all successor tenants up to the two-year period covered by the Weatherization Agreement.

The Rental Agreement specifies conditions regarding evictions and/or rent increases as a result of the weatherization work that is done. If a complaint is filed, the agency will have the property owner/landlord verify that such actions are justifiable. Legal Services are available to help low-income households in ensuring that agreement compliance.

The State of Connecticut, in accordance with 10 CFR 440.22(b) has developed specific guidance in respect to the weatherization of multi-family and multi-unit buildings. Weatherization of multi-unit buildings requires that a percentage of the occupants of the building be eligible based on program guidelines defined in single unit eligibility with the following conditions:

For duplexes and up to four-unit buildings, 50% of the units must be occupied by eligible households.

For complexes with five or more units, 66% of the units must be occupied by eligible households.

The Sub-grantee may not refuse to weatherize an otherwise eligible rental property. Weatherization services are to be provided to owner-occupied and rental properties alike with no priority given to either. Applicants from households who are renting shall be ranked and verified in the same manner as used with households who own the property in which they reside.

Other than Health and Safety measures, weatherization work performed on all dwelling units is based on the Savings-to-Investment Ratio (SIR) of a DOE-approved energy audit. Measures installed must have an overall SIR of one or more, thereby restricting the amount of enhancement that may occur. No undue or excessive enhancement shall be allowed to affect the value of the dwelling unit.

The agreement among the local agency and the property owner/landlord, a copy of which is provided to the tenant, covers issues dealing with the eviction of eligible tenants from the property. In signing the agreement, the property owner/landlord also agrees that the property is not, or will not be, for sale within six months of the agreement date. If the property is listed for sale, no weatherization work will be done.

The State will seek financial participation from property owners/landlords. Property owners/landlords will be asked to contribute 20% of the material cost - up to a maximum of \$500 - toward weatherization of the eligible rental unit. In buildings weatherized under the 50% or 66% Rule, the landlord contribution will be 20% of the total material installed in the building, up to a maximum of \$500 per eligible unit. Property owners eligible for weatherization assistance will not be required to make contributions.

Under exigent circumstances, the State reserves the right to waive the requirement regarding contributions.

As noted above, Legal Services are available to help clients who may have disputes with the property owner/landlord regarding eviction or rent increases.

**Describe the deferral Process**

When conditions warrant, it may be necessary to defer work in a dwelling, postponing until the problem(s) can be resolved.

All serious health and safety problems encountered that will either prevent or delay Weatherization service delivery is documented on the "Notice of Postponement of Services" form, along with possible solutions. The client is asked to sign this form, which is then signed and dated by a CAA representative. If the client is a renter, a copy is also sent to the landlord. Clients remain eligible, without eligibility re-verification, for weatherization services if all Health and Safety concerns triggering deferral are addressed within sixty (60) days of receipt. Should remediation take longer than that, eligibility must be re-verified in accordance with State and federal policy.

**Deferral conditions may include any of the following situations:**

The client has known health conditions that would be impacted by the installation of insulation or other measures;

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The building structure or its' mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively;

The building has sewage/other sanitary problems that may endanger client/Weatherization workers if weatherization work were performed;

The building has been condemned or electrical, heating, plumbing or other equipment has been "red tagged" by local or State building officials or utilities;

Moisture and drainage problems are so severe they cannot be resolved under existing guidelines;

Dangerous conditions exist due to high CO levels in combustion appliances, high levels of formaldehyde or other pollutants and VOC's, and cannot be resolved under existing guidelines;

The extent and condition of lead-based paint in the building would potentially create farther H&S problems;

The client is uncooperative, abusive or threatening to auditor/crew/subcontractors or others who must work in/visit dwelling;

In the weatherization auditor's judgment, any condition exists which may endanger H&S of work crew or subcontractor (e.g., extremely unsanitary conditions);

In the weatherization auditor's judgment, illegal activities are taking place on the property;

Infestation of pests cannot be reasonably removed or creates health and safety concern for weatherization workers;

Client exhibits sign(s) of hoarding behavior that prevents the installation of weatherization measures necessary to improve the home's efficiency;

Radon levels or the perception of Radon related conditions at the site prevent Weatherization activities to be permitted by the client.

**Note:** For further reference please see *CT WAP Operations and Training Manual 2020 - Section(s) 204, 204.1, 204.2, 204.3, and 424.1*

**V.1.3 Definition of Children**

Definition of children (below age): **6**

**V.1.4 Approach to Tribal Organizations**

Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

In accordance with 10 CFR 440.11, low income members of an Indian tribe will receive benefits equivalent to the assistance provided to other low-income persons within the State of Connecticut.

**V.2 Selection of Areas to Be Served**

The State uses one or more entities authorized by 10 CFR 440.15 to serve as one or more Subgrantees (subcontractors) and deliver services that have demonstrated experience and performance in weatherization or housing renovation activities; experience in helping low-income persons in the area to be served; and capacity to undertake a timely and effective weatherization program.

The terms "Subgrantee" and "Subgrantees" as well as "subcontractor" and "subcontractors" are used with the same meaning interchangeably throughout this State Plan, regardless of the number of actual Subgrantee(s)/subcontractor(s) in any given Program Year.

CT DEEP intends to continue to contract with the community action agency, Community Renewal Team, and New Opportunities, regionally, to provide services in Program Year 2020, with requirements to achieve production goals identified by region in the Proposed State Plan to ensure statewide delivery of services. Specifically, ensure equitable geographic distribution, CT DEEP will include target unit production goals by region in Subgrantee contracts. Regional production goals and budgets are based upon a demographic formula used to deliver WAP services in previous years. CT DEEP believes this approach is necessary to ensure the delivery of services to WAP clients statewide.

CT DEEP will seek the input of the Policy Advisory Council, Community Action Agencies, the CT Dept. of Social Services LIHEAP program, and others to assess how to improve the delivery of services statewide in PY20. Former Subgrantees and subcontractors are not precluded from seeking to provide services in PY20 if they can demonstrate the technical and programmatic capacity and financial stability needed to implement the program. Through ongoing monitoring as well as training and technical assistance, CT DEEP works to ensure that all Subgrantees maintain administrative, programmatic, and technical staff or subcontractors capable of operating a successful program.

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### V.3 Priorities

Clients determined eligible for energy assistance receive, with their notice of eligibility, weatherization information which they complete and return if they are interested in receiving weatherization services. Priority is given to clients most vulnerable, including households with a member who is elderly (60 years and older), disabled, or younger than six (6). Priority consideration is also given to households with high energy use (annual heating costs exceeding \$2,000). DSS provides to DEEP, by region, the list of households eligible for LIHEAP.

#### High Energy Burden Priority

CT WAP considers households in which greater than 10% of the household income is spent on energy costs as being classified as a High Energy Burden site and service delivery priority will be given to those sites identified.

### V.4 Climatic Conditions

CT WAP has implemented the use of the Weatherization Assistant 8.9 audit tool. Climatic conditions from Weather Stations in closest proximity to the weatherized home site will be used for all site-specific WAP analysis.

The IECC 2012 Climate Zone Map recognizes the entire state of Connecticut as within Zone 5.

CT WAP has implemented the use of the Weatherization Assistant 8.9 audit tool. The Weatherization Assistant 8.9 Audit tool utilizes Hartford, CT as the only weather file located within CT. CT recognizes Hartford, CT as the city which best represents the average climate conditions within CT at 5584 heating degree days. All site specific audits conducted within CT will utilize Hartford, CT as the selected weather file.

In accordance with WPN 11-06, climate justification for heating system repair or replacement is required for those costs to be allowable as expenses. Heating degree days were calculated through BizEE Degree Days software tool [www.degreedays.net](http://www.degreedays.net) for a period of 36 months from January 2017 to January 2019.

Based on this information:

- The central part of the State (Hartford) averaged, 5,963 heating degree days.
- The south-eastern part of the state (Bridgeport) averaged, 5,128 heating degree days.
- The north-east part of the State (Windham) averaged, 5,852 heating degree days.
- The north-west part of the state (Waterbury) averaged 6,158 heating degree days.
- The south-central part of the state (New Haven) averaged 5,218 heating degree days.

Connecticut's average of 5,584 heating degree days justifies heating system repairs or replacement as a health and safety measure. Cooling Degree Days are not used in Program Year 2020 analyses.

CT WAP has implemented the use of the DOE approved Weatherization Assistant 8.9 Audit tool. All NEAT and MHEA site specific audits will reference Hartford, CT Weather files to complete audits.

### V.5 Type of Weatherization Work to Be Done

#### V.5.1 Technical Guides and Materials

As a threshold matter, all work undertaken by CT WAP is performed in accordance with the DOE-approved energy audit procedures and 10 CFR 440 (Appendix A).

**Note:** All Work performed and reported as DOE completed CT WAP sites must be in compliance with DOE WPN 15-4 and the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide SWS Aligned Edition Version (022519), copyright 2019, The CT WAP Operations and Training Manual (Revised 2020) and the current Year State Plan/Master File.

In accordance with US DOE WPN 12-5 CT WAP will provide Subgrantees and/or contractors with technical requirements for field work including, but not limited to, Audit/Testing policy and procedures; Installation of energy conservation measures (ECM), Health and Safety (H&S) and incidental repair measures (IRM), and Final Inspections.

CT WAP routinely reviews this compliance aspect with the Subgrantee at the time of contract execution and obtains an authorized signature of receipt by the

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Subgrantee.

CT WAP routinely reviews this compliance aspect within the content of the Subgrantee direct-hire and vendor agreements and require authorized signature of receipt by the authorized designee of each direct-hire or vendor.

CT WAP requires documentation of all executed direct hire and vendor agreements be provided within 2 business days of full execution of agreements.

All documentation utilized for the purpose of executing contracted services and/or guiding field work shall be fully aligned with SWS and contains language that confirms Subgrantee and/or contractors receipt, cognizance and confirmation of communicated materials as referenced above. All work performed by CT WAP Subgrantees and/or contractors must be consistent with CT WAP SWS aligned Field standards and SWS aligned Field Guides.

**CT WAP has instituted policy and procedures to ensure that:**

CT WAP has provided electronic links to the CT WAP Quality Work Plan, CT Weatherization Field Guide SWS Aligned Edition (022519) and the CT WAP Operations and Training Manual (Revised 2020) Edition and the Current year State Plan/Master File as part of the executed agreement between the Grantee and subgrantee and the subgrantee and direct-hire contractors.

CT WAP has produced work quality standards that continuously align with DOE WPN 15-4, The CT WAP Quality Work Plan, CT Weatherization Field Guide SWS Aligned Edition (022519) and the current year State Plan/Master File.

CT WAP Monitoring shall conduct ongoing assessment of Subgrantee staff and contracted resources to ensure that all personnel engaged in installed measures is aware and practicing work standards in compliance with DOE WPN 15-4, The CT WAP Quality Work Plan (2020), The CT Weatherization Field Guide SWS Aligned Edition (022519), The CT WAP Operations and Training Manual (Revised 2020) Edition and the current year State Plan/Master File.

CT WAP Monitoring shall ensure that 100% of Weatherized homes are inspected in compliance with DOE WPN 15-4, The CT WAP Quality Work Plan (2020), The CT WAP Weatherization Field Guide SWS Aligned Edition (022519), The CT WAP Operations and Training Manual (Revised 2020) Edition and the current year State Plan/Master File.

**Field guide types approval dates**

Single-Family: 4/15/2019
Manufactured Housing: 4/15/2019
Multi-Family:

**V.5.2 Energy Audit Procedures**

**Audit Procedures and Dates Most Recently Approved by DOE**

Audit Procedure: Single-Family
Audit Name: Other (specify)
CT WAP is DOE approved (8/1/2015) to continue to utilize the Site specific, Weatherization Assistant 8.9 (NEAT) Audit tool software. Only measures which achieve an individual SIR of 1 or more are allowed.
Approval Date: 8/1/2015

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
CT WAP is DOE approved (8/1/2015) to use the MHEA audit tool software to respond to manufactured home service requests.
Approval Date: 8/1/2015

Audit Procedure: Multi-Family
Audit Name: Other (specify)
CT WAP is exploring implementing the use of Mul-TEA audit tool for multi-family buildings in the coming year.
Approval Date:

**Comments**

Site-specific NEAT energy audits shall be performed for all jobs. After dwellings are thoroughly checked for all needed measures, the audit prioritizes the recommended measures by SIR. Except for Health and Safety (and general heat waste) measures, only measures with an individual SIR of one or more are allowed. Health and Safety (H&S) checks, detailed in the H&S Plan and client education, are also an important part of the energy audit process. Subgrantees providing weatherization services review, discuss, and explain audit results with the client; provide collateral materials and appropriate contact information.
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State level Experts continue to closely monitor NEAT audit tool proficiency of all Subgrantees. SWS aligned QWP-20 Setup libraries will be distributed by July 15, 2020.

\* Multi-family - During Program Year 2020, CT WAP will continue to direct Subgrantees to refer all large multi-family weatherization requests to the state's utility based weatherization programs, which can provide comprehensive weatherization services to these sites.

### V.5.3 Final Inspection

The CT WAP mechanism for adjusting QCI Final Inspection and QCI In-Process Monitoring rates based on results and information captured within the CT WAP Quality Control Inspection Report (QCI, QWP-20) and the CT WAP Inspection Tracker PY19 Spreadsheets. Within those documents are activity rates stated as percentages, as well as action levels for increased QCI Final Inspection and QCI In-Process monitoring.

CT WAP policy maintains that QCI Final Inspection rates will be conducted on 10% of all completed units.

CT WAP policy maintains that QCI In-Process Monitoring will be conducted on 10% of all production units as well.

**Note:** All Final QCI Inspection conducted on Work performed and reported as DOE completed CT WAP sites must be in compliance with DOE WPN 15-4 and the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide SWS Aligned Edition (022519) and the current year State Plan/Master File.

Attendees that fail to achieve certification beyond that point are required to make arrangements with their respective agencies regarding additional training and testing costs as soon as possible, contingent upon CT WAP approval.

Failure of any personnel to achieve QCI Certification will result in temporary suspension from additional "Comprehensive" training opportunities.

Please see attached CT WAP Quality Control Inspection Report (QCI-QWP-20) and CT WAP Quality Work Plan

CT WAP has developed specific policy and tracking documents to address DOE prescribed QCI policy for administering quality control inspections.

**Independent QCI:** The individual that has no direct involvement in the prior work on the home either as the Auditor or as a member of the installation crew. A Grantee or DOE approved representative or third party QCI will perform at least 5% of all completed units.

**Independent Auditor/QCI:** The Auditor who performs the audit and creates the work order also performs the final QCI inspection. The auditor can have no involvement in actual installed measures at the site.

**Note:** When sub-grantees use the Auditor/QCI model, CT WAP will increase quality assurance monitoring to a minimum of 10% of all completed units. In addition, CT WAP will conduct ongoing quality assurance monitoring to ensure that the individual dual role of Auditor/Inspector is able to effectively and consistently perform both tasks on a regular basis.

During Program Year 2020 CT WAP anticipates increasing volume of unit completions throughout the Program Year. The existing Subgrantee staffing provides two dual role Auditor/Inspector(s). The CT WAP Training Plan for Program Year 2020 includes training to ensure an additional two Auditor/Inspector(s). CT WAP will monitor the program at a minimum of 10% of all completed units and assess inspection quality and capacity throughout Program Year 2020.

For additional information see V.8.4 Training and Technical Assistance Approach (Program Year 2020 Comprehensive Training)

CT WAP will provide specific tracking to evaluate the QCI Inspection process to document the range of controls outlined in WPN 15-4. Each CT WAP QCI Inspection Certificate identifies relationships of Auditor, Auditor/QCI and or Independent QCI. Projected monitoring and Final QCI Inspection goals have been created and funds allocated to respond to increased needs as determined necessary.

A simple rating system has been developed to quantify the extent of the failed QCI Inspections as related to local agency Inspections and installed measures.

One star \* is noted for any missed opportunity or single installed measure deficiency.

Two stars \*\* are noted for any single Health and Safety missed opportunity or deficiency in addressing Health and Safety issues found at the site.

Three Stars \*\*\* are noted for any combination of deficiencies found to require immediate corrective actions.

**Note:** Scoring will be compiled both before and after corrective actions have been undertaken.

Final evaluations will be used for assessment of effectiveness for Auditors, QCI Inspection Personnel and Installation services. Disciplinary actions will be gauged and assigned as follows:

**Level-1:** Subgrantee and or Subcontractor has routinely responded to corrective actions 100% effective.

**Level-2:** Subgrantee or Subcontractor has had marginal or insufficient results responding to corrective actions on initial responses. ultimately addressing all concerns and demonstrating improvement (subject to increased monitoring and inspection).

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**Level-3:** Subgrantee or Subcontractor has failed to address corrective actions and or deficiencies repeatedly. (Resulting in temporary suspension and disallowed costs).

**Level-4:** Indefinite suspension, defunding of Subgrantee and Subcontracted resources.

**V.6 Weatherization Analysis of Effectiveness**

All CT Analysis of effectiveness will be conducted in compliance with DOE WPN 15 -4 and the CT WAP Quality Work Plan (2020) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition (022519) and the current year State Plan/Master File. There is an ongoing evaluation process used to determine the overall effectiveness of each subgrantee. This is done through the annual monitoring processes that are outlined in the Monitoring Approach, and also through an ongoing review process including a mid-year assessment of program implementation, as well as:

In-depth review of Monthly Status Reports ensuring that all expenditures are accurately reported and within State-approved budget limitations;

In-depth review of each BWR to ensure the NEAT, MHEA Audit list of recommended measures was followed, and to ensure costs of individual measures are within the audit estimate;

The frequency of measures installed is tracked for each subgrantee to ensure statewide consistency;

Average job costs are tracked to ensure that the subgrantee is within State mandated limits; and

Jobs are tracked regionally to ensure adequate and fair coverage across the entire State.

During Comprehensive Monitoring Visits, the State reviews subgrantee procurement practices of both materials and subcontracting to assure costs are fair and relatively consistent across the state.

The above process culminates in a payment authorization to the subgrantee. Any problems or questionable trends are flagged for review or investigation by monitoring state.

Productivity and energy savings (tied to productivity) are compared and contrasted among the regional Weatherization Service Areas on a Quarterly basis.

The goal is a uniformly effective WAP throughout the entire State. Each client served, regardless of town or serving subgrantee, is expected to receive the same quality service. The State reserves the right to terminate or alter the service area of any subgrantee that cannot meet statewide standards.

Patterns noticed during State site visits will be used to determine T&TA needs (Regular and Comprehensive) at the state and subgrantee level. Site visits of specific subgrantees will be increased if deemed necessary to ensure that training has had the desired effect of reducing issues and corrective actions in the field.

During major monitoring activities, proper delegation of financial responsibilities are confirmed, as well as record retention policies and other financial systems. During regular monitoring activities, as well as major monitoring, we review the tracking of technical compliance, such as LRRP and Health and Safety.

Routine monitoring consists of file reviews, which track installed measure costs. In major monitoring, we review the subgrantee's procurement procedures as well as analysis of installed measures in file review, to assure measures are being invoiced accurately.

The State is constantly improving its management of WAP by attending NASCSP conferences and orientations, participating in Regional NASCSP conference calls, learning best practices from other states, and leveraging the help and knowledge of the DOE WAP program managers.

CT WAP is continually working with in-state utility partners to evaluate installed measures costs and to utilize a streamlined approach to deliver effective and quality weatherization and energy efficiency services to the Connecticut Low-Income community. The utility-administered income-eligible weatherization assistance program services 16,000- 20,000 income-eligible homes per year, and CT DEEP and the utilities are continuously working to standardize requirements between the service delivery models.

A continuous Improvement approach is used to monitor the subgrantee(s) in the context of limited capacity that has been demonstrated by a relatively small number of community action agencies actively involved in weatherization assistance programs in the state. CT DEEP is committed to monitoring the effectiveness of the subgrantee(s) improve service delivery.

**V.7 Health and Safety**

CT WAP has implemented policies and procedures to address health and safety considerations. These are included in the CT WAP Operations and Training Manual: Sec. 400 - Health and Safety (QWP 2020) (WPN 17-7).

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**V.8 Program Management**

**V.8.1 Overview and Organization**

WAP administrative policies and procedures are outlined in Section 100 of the [Connecticut Weatherization Assistance Program Operations Manual](#), which is regularly updated and publicly available online at DEEP's webpage.

The U.S. DOE Weatherization Assistance Program for Low-Income Persons is administered by the State grantee, the Department of Energy and Environmental Protection (CT DEEP). The Connecticut Weatherization Assistance Program is administered by the Bureau of Energy and Technology Policy within the Energy Branch, which is overseen by the Deputy Commissioner of DEEP's Energy Branch. The Bureau of Energy and Technology Policy's Bureau Chief oversees the operations of the DEEP staff and subgrantees delivering the program.

DEEP also makes policy and regulatory decisions regarding the rate-payer funded, and utility-administered residential low-income energy program known as Home Energy Solutions-Income Eligible (HES-IE). The HES-IE program serves the same population as WAP in CT and currently cost-shares many measures reported on DOE WAP units. The alignment of the HES-IE program with WAP is a goal of the Department to ensure the best quality service for the low-income population.

DEEP does not administer the Connecticut Low-Income Home Energy Assistance Program. The responsibility of administering LIHEAP belongs to the Department of Social Services (DSS). CT DEEP works closely with DSS, due to simultaneous intake for clients into both programs, and is developing the integration of some services with LIHEAP services.

DEEP's Bureau of Energy and Technology Policy administers the State Energy Program (SEP) grant, generally by the same office that administers WAP.

HUD/ housing programs are administered through the Connecticut Department of Housing.

**V.8.2 Administrative Expenditure Limits**

Total Administrative expenditures (State and Subgrantee) will not exceed 10% of grant funds. Not more than 5% will be used by the State and not more than 5% will be made available to subgrantees (10 CFR 440.18 (e)).

**V.8.3 Monitoring Activities**

Connecticut's monitoring approach will include the following components:

Administrative review of documents and reports related to the organization, operation, and performance of local service delivery;

Monitoring for technical compliance with standards, performance measures and applicable codes and other policies related to the installation of materials; and Fiscal Audit of financial stability and accountability.

**Note:** All Monitoring activities will be conducted in compliance with DOE Guidance and the Connecticut Weatherization Assistance Program Quality Work Plan (2020) requirements, Connecticut Weatherization Assistance Program Weatherization Field Guide Standard Work Specifications Aligned Edition (022519) and the current year State Plan/Master File. (For further information refer to CT WAP Operations Manual sections - 300, 400, 500, 600 and 700)

CT WAP recognizes DOE Guidance and references the following CT WAP documents regarding specified approach areas:

**Programmatic and Management Monitoring**

The CT WAP Operations and Training Manual (2019) Sections- 300, 400, 500, 600 and 800 and the CT WAP SWS aligned Field Guide (2019).

WPN: 16-4, Attachments 1 and 2

**Subgrantee Monitoring**

The CT WAP Operations and Training Manual (2019) Sections- 100, 300, 400, 500, 600 and 700 and the CT WAP SWS aligned Field Guide (2019).

CT WAP utilizes WPN 16-4 and attachments 3 and 4 updated Checklists and Operations Manual content specific Subgrantee monitoring activities

**Note:** During the current program year, CT WAP will continue to adjust monitoring activities commensurate with the quality of work and the progress demonstrated by the subgrantee.

Subgrantee monitoring will accept WPN 12-5 Guidance and all other applicable DOE Guidance.

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CT WAP will perform comprehensive on-site monitoring statewide on an annual basis.

Records reviews at the subgrantee's office will involve multiple visits and may be focused on regions of the state, resulting in separate annual monitoring events according to region.

At a minimum, there will be a total of at least 12 days of on-site monitoring.

In alignment with WPN 15-4, more frequent monitoring will be conducted at subgrantees that have been identified as having significant deficiencies.

**The individual on-site monitoring activities are structured as follows:**

Comprehensive Administrative/ Fiscal Monitoring (annual) based on PY19 allocation.

Technical Site Visit Monitoring (minimum of 10% of completed units and a minimum of 20% of completed units)

**Note:** While this exceeds DOE minimum standards, the recent audit tool implementation and QWP-20 standards compliance warrant additional activities to ensure best outcomes. Actual program year totals may be adjusted to DOE minimum levels if mid-year assessments indicate consistent acceptable performance at any Subgrantee.

CT WAP will utilize contracted QCI services via a T&TA Subgrantee to conduct QCI inspection of at least 10% of all reported DOE completed units.

As part of our contract(s) with Subgrantees and as a part of our annual monitoring visit we require the Subgrantee to submit their most recent A-133 financial audit.

CT WAP will continue to contract the services of a Technical and Monitoring Compliance Consultant via a T&TA Subaward to provide all Quality Control Inspections services.

**A dedicated, full time, Technical Monitor, employed or contracted by the Department of Energy and Environmental Protection (DEEP) will continue to provide Monitoring and support services under the direction of Weatherization Program Management.**

CT WAP anticipates that Subgrantee will utilize components of the DOE prescribed standard options to conduct Quality Control Inspections as defined in WPN 15-4.

**The Grantee-developed Quality Control Inspection process will provide for increased flexibility and effectiveness in conducting all QCI and monitoring activities as follows:**

Each QCI Inspection will document the relationship between the individual performing the quality control inspection to the work to include; independent status, role in audit process and role in any measures installations.

Each QCI inspection will contain documentation and verification that each quality control inspection is performed in an impartial and complete manner.

Each QCI inspection is subject to Grantee level assessment of effectiveness and compliance with program inspection policies and contains documentation of any findings related to the quality of the inspection and impartiality of the inspection process.

The Grantee will maintain tracking of all Grantee QCI activities to include all aspects of the Grantee developed QCI process, subsequent corrective actions, and final outcomes.

**Contracted individual(s)**

Quality Control Inspector(s), Technical Monitoring Compliance Consultant(s), Training, Training Coordination, and Technical Support- (Via Subgrantee) Credentials: BPI HEP QCI, Building Analyst, Building Envelope, Multi-family Building Analyst, OSHA-10, LSW, RRP, and BPI HHE

Compensation: 100% Grantee T&TA Subgrantee (To include POV Travel & Expenses)

**Weatherization State Team Members and their responsibilities for monitoring**

**(1) Research Analyst/Program Monitor in Office of Energy Demand**

Program Responsibilities:  
Monitoring of subgrantee(s) programmatic performance and compliance

Credentials: BPI Building Analyst

Compensation: State and federally funded

Travel and training: 100% federally funded (Training, File Review, and Monitoring)

**(1) Research Analyst/Grant Administrator in Office of Energy Demand**

Program Responsibilities:  
Monitoring of subgrantee(s) fiscal performance and compliance

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Compensation: State and federally funded

Travel and training: 100% federally funded (Training, File Review, and Monitoring)

**(1) Grant Financial Specialist in Central Business Office**

Program Responsibilities:

Monitoring of subgrantee(s) fiscal performance and compliance

Compensation: State

Travel and training: 100% federally funded

Annual Administrative/Fiscal Monitoring is performed via a Team approach made up of Technical and Fiscal Monitoring personnel utilizing the DOE WAP Onsite Monitoring Field/Subgrantee Checklist as well as Instruments prepared specifically for use in CT.

CT Annual Administrative Review Monitoring Tool

CT Annual Administrative Review Fiscal Monitoring Tool

CT Field Monitoring Tool for File Review and on-site Field Review

CT WAP Field Visit Form

Annual Comprehensive Administrative/Fiscal Monitoring visits, based on historical knowledge, are estimated to require three to five days to complete the review of a single region, with five regions being reviewed for a complete statewide review.

Given the small geographical size of Connecticut, an overnight stay is not required for CT WAP monitoring staff.

Any and all deficiencies, related findings, and corrective actions are reported to each Subgrantees' Executive Director, Program Director and Chief Financial Officer within 30 days of completion, with specific direction for corrective actions, response times and terms and conditions in the event of failed compliance.

CT WAP reserves the right to disallow any costs associated with any discrepancy identified during any Technical or Fiscal monitoring activity.

**Note:** Findings such as waste, fraud, or abuse will be reported to DOE immediately.

Subgrantees are subject to removal from the program and will be defunded of all remaining allocations in the event that findings remain consistently non-compliant with either State or Federal requirements. Such findings may include, but are not limited to:

Consistent production of sub-standard workmanship, with no measurable improvement within 90 days of notification.

Inadequate Fiscal and or Management policy, procedures, enforcement or controls.

Failure to improve current Management systems within stated notification time frames and or implementation of corrected policy, procedures and practices.

**Note:** Any Subgrantee removal shall result in disqualification for following program year participation.

All Subgrantee monitoring is routinely tracked and analyzed to provide accurate classification of findings to detail specific incidents, resolution timelines and training requirements necessary for incremental and annual planning and reporting.

Technical Monitoring will be tentatively performed at the Subgrantee during PY 2020 & at a minimum of 10% site visits and 20% file reviews of completed units.

**Note:** CT WAP will utilize contracted QCI services via the T&TA subaward to conduct QCI inspection of at least 10% of all reported DOE completed units.

By consolidating multiple site visits and file review visits, DEEP estimates that 12 on-site visits will be needed statewide. Over-night stay is not required to conduct Subgrantee site visits in CT.

Additional Monitoring will be conducted in the event that Subgrantee(s) is found to have difficulties in managing, programmatic, technical or compliance related delivery of services.

Flexibility in scheduling has been factored into planning to allow additional visits or training as necessary.

CT WAP routinely and systematically reviews monthly reports and conducts desk reviews of Building Weatherization Reporting to identify any potential monitoring needs.

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Technical Monitoring selects projects in various stages of completion and for specific measures to further evaluate Subgrantees effectiveness and training needs.

Efforts are made to evaluate multiple Subgrantee personnel and contractors engaged in the weatherization process from intake through completion. CT WAP utilizes checklists for all Technical Monitoring activities as follows:

CT WAP Audit Checklist

CT WAP Installer Checklist

CT WAP BWR Review FORM

CT Field Monitoring Tool for Field and On-Site Field Review

CT WAP Field Visit Form

DOE WPN 16-4

**Note:** All Technical Compliance Monitoring will be conducted in compliance with DOE WPN 15-4 and the CT WAP Quality Work Plan (2020) requirements, CT WAP Weatherization Filed Guided SWS Aligned Edition (022519) and the current year State Plan/Master File and USDOE WPN 17-7 Health and Safety Guidance.

CT WAP maintains individual production and cost per unit metrics for each individual Subgrantee and considers these factors in all monitoring activities.

Any and all deficiencies, related findings and corrective actions are reported to Subgrantee program Management within 30 days of completed monitoring events, with the exception of Health and Safety findings. Health and Safety findings, which may present an imminent danger to the occupants, are immediately reported to Subgrantee management to immediately resolve all issues.

**Note:** Findings such as waste, fraud, or abuse will be reported to DOE immediately.

Written Monitoring reports delivered to Subgrantee will contain specific details for corrective actions and response times not to exceed 30 days of receipt of notifications. Any response directed to Subgrantee fiscal management that fails to address corrective action requests within the given time limits will result in disallowed costs of any stated discrepancy. Any disallowed cost will be deducted from subsequent monthly invoicing until resolved to the satisfaction of CT WAP Monitoring. Further, a Subgrantee's failure to respond to a corrective action plan for significant findings will result in an increased number of monitoring visits and an increased frequency of visits until the corrective action is resolved and the State is fully satisfied.

Subgrantees are subject to removal from the program and will be defunded of all remaining funds if found to be consistently non-compliant with Federal and State requirements. Such findings may include, but are not limited to:

Consistent production of sub-standard workmanship, with no measurable improvement within 90 days of notification.

Inadequate fiscal and or Management policy, procedures, enforcement and controls.

Failure to improve current Management systems within stated notification timeframes and implementation of corrected policy procedures and practices.

**Note:** Any Subgrantee removal shall result in disqualification from following Program Year participation.

Any and all deficiencies, related findings and corrective actions are compiled and tracked to provide an individual assessment of effectiveness for each Subgrantee.

Measures, training needs and outcomes are routinely reviewed to assure that corrective actions are effective and continuous.

**V.8.4 Training and Technical Assistance Approach and Activities**

CT WAP Training and Technical Assistance personnel and CT WAP staff Monitoring tracks and conducts a comparative analysis of subgrantee effectiveness via Desk Monitoring, QCI final Inspection and Field monitoring results, compiled monthly, to evaluate actual energy savings achieved. Grantee T&TA funding allocated for this Program Year will be used for the following activities:

Training

Staffing QCI and Field monitor(s)

Subgrantee for recertification and other training needs not covered through the subgrantee level T&TA

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The implementation of the Weatherization Assistant Audit Tool has provided CT WAP with a platform to develop spreadsheet analysis of actual energy conservation measure savings and health and safety expenditures.

During PY 19 CT WAP conducted in-house trainings related to use of the Weatherization Assistant 8.9 Audit tool (NEAT, MHEA) and, ASHRAE: 16.2.2 - 2016 compliance and ventilation guidelines that have improved these results in all cases.

Ongoing assessment and analysis provide substantially greater detail with respect to both subgrantee performance and contracted resources engaged in measure installations.

CT WAP T&TA considers all performance related reporting in developing all training strategy.

CT WAP continuously tracks individual Subgrantee training needs and results and systematically adjusts training and monitoring to meet demands for all phases of Program Administration, Production and, effectiveness in implementing improvement goals.

The Department of Energy (DOE) allocates Training and Technical Assistance (T&TA) funding to support State program operations such as: Analysis, measurement, and documentation of program performance, skill development, and local monitoring to improve program effectiveness. To ensure consistent delivery of high-quality weatherization services through a network of Weatherization Professionals, identified and developed a set of core competencies (see, e.g., NASCSP, EERE) for the various staff positions that implement the Weatherization Program including the types of training required to increase levels of core competencies for these job categories. Increasing competency levels and workforce expertise helps assure that every home weatherized receives appropriate, properly installed cost-effective measures.

**Note:** For PY 2020 CT WAP will contract Training Coordination and evaluation services via a T&TA Subaward.

**Note:** All CT WAP Comprehensive and Regular Training will be in compliance with DOE WPN 15-4 and the CT WAP Quality Work Plan (2020) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition (022519) and the current year State Plan/Master File.

Although many core competencies and job classifications are universal, not all the core competencies are appropriate for the job classifications identified in every state. For instance, testing, repairing or replacing heating and cooling systems in Connecticut requires certification or licensing from the State. Therefore, the Auditor or Weatherization Installer may not be able to conduct this work. In Connecticut, work on heating and cooling systems must be subcontracted to a licensed contractor outside WAP. However, just because an HVAC contractor is licensed by the State does not mean he/she possesses competencies WAP requires. Additional training of such contractors may be required, or someone at the local agency must be competent to specify what work the contractor is to do and to verify that the completed work complies with WAP technical standards.

**DOE also places certain requirements for training and certification including:**

At least one onsite worker must be an EPA Lead RRP Certified Renovator; and  
EPA Lead RRP training for all State Monitors.

To increase Connecticut's WAP network expertise, numerous program training opportunities and hands-on workshops have been and will continue to be conducted with the goal to maximize energy savings, minimize production costs, improve quality of work, and foster management expertise, while reducing the potential for waste, fraud abuse, and mismanagement.

In Connecticut, T&TA funds are primarily used to train State and Subgrantee weatherization staff on program operations, management, and technical topics. Staff members receive training at national and regional training conferences, regional and state training centers, State and Subgrantee provided workshops, and in the field.

Subgrantees are required to have qualified weatherization staff (and contractors, as may be applicable) fully trained in the performance of individual functions.

Through monitoring review and assessments, the State coordinates with Subgrantees to determine types of training needed to strengthen weatherization service delivery. Based on the need of the statewide weatherization network, the State will continue to periodically provide training and workshops such as statewide EPA Lead-Safe Training, management training, fiscal training, air sealing, use of two-part foam, pressure diagnostics, proper insulation of attics and walls, and so forth.

The State has developed long-standing relationships with a range of weatherization training resources that supply the full range of training activities. The Grantee allocates funding directly to the Subgrantees for local staff, and sometimes contractor personnel, to attend program-related training. To facilitate contractor training, Subgrantees are allowed to pay a per-diem, on a case-by-case basis, for contractor personnel to attend training when it is designated as mandatory and has prior approval from the Grantee.

Subgrantees must ensure that weatherization staff and contractors maintain required levels of training and certifications. CT -WAP requires that the Subgrantee evaluates their weatherization workforce to determine the types of training needed. The Subgrantees policy should be to encourage its staff, and that of its contractors, to attend training to strengthen worker competencies and skills.

CT WAP conducts routine, semi-annual training assessment needs via subgrantee meetings, surveys, and monitoring results analysis.

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**Note:** All CT WAP comprehensive and regular Training will be in compliance with DOE WPN 15-4 and the CT WAP Quality Work Plan (2020) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition (022519) and the current year State Plan/Master File.

The current CT WAP workforce is comprised of Grantee, Subgrantee and Contractor level BPI Certified Professionals, including:

Grantee Certified QCI Inspector(s) Grantee Monitor(s)

Subgrantee Auditor(s)

Subgrantee Certified QCI Inspector(s) Contractor Crew Chief(s)

Contractor Installer(s)

In Program Year 2020, CT proposes to retain \$20,000 WAP T&TA funds at the Grantee level, in order to efficiently procure specific training for Grantee staff.

**Program Year 2020 Comprehensive**

Projected T&TA budgets have been structured to allow continued re-assessment and supplemental training as determined necessary. CT is not limiting training and testing to Grantee and Subgrantee staff and will encourage participation by Subcontractors in good standing with Subgrantees who have been carefully screened and have agreed to execute retention agreements with CT WAP.

CT WAP has successfully identified IREC accredited resources to provide NREL, JTA aligned, both in state and in close proximity to CT that can deliver both single family and multi-family curriculums. Ongoing evaluation of resources will be conducted to evaluate and determine opportunities for best outcomes and cost-effectiveness, prior to the procurement of services.

In preparation for Program Year 2020 CT WAP has reached out on a Regional basis to identify states interested in combining training resources and training activities.

A consensus among multiple states and training resources has been established and planning and executable agreements are being drafted for services to be delivered during the 2020 Program Year.

Of the Grantee T&TA, a portion will be allocated via T&TA subgrantee to provide and evaluate staff training, testing, re-testing, and associated travel and time.

**Program Year 2020 Comprehensive (Train or Recertify):**

Approximately (6) BPI Certified Home Energy Professional (HEP) Energy Auditors

Approximately (24) BPI (HEP) Certified Crew Leaders

Approximately (40) BPI (HEP) Certified Retrofit Installers

Approximately (6) QCI Recertification (Training and Testing

Approximately (3) additional BPI (HEP) Certified QCI personnel

**Program Year 2020 Regular Training (Train or Recertify):**

CT WAP has existing relationships with multiple resources, previously utilized to provide regular Training including: ASHRAE 62.2 - 2016, RRP, OSHA, BPI Healthy Home Evaluator on an as-needed basis.

**Note:** The CT WAP T&TA Subgrantee has allocated \$50,000 for Regular Training. Each CT WAP Weatherization Subgrantee has allocated a portion of the budget for individual certification maintenance and tool and equipment costs.

Ongoing Weatherization Assistant (NEAT, MHEA) training for Grantee and Subgrantee support staff will be delivered as needed during the year. This ongoing training may be delivered by Oak Ridge National Laboratory, the CT WAP T&TA Subgrantee or both.

T&TA funds may be used for most any training activity which will clearly improve the quality of the Subgrantee's Wx. work. Such training

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would include, but not be limited to:

Program Administration/Training: Training is important in all aspects of WAP, including the non-technical and administrative functions. Some examples include:

- Program management and Wx program supervision
- Financial management including budgets, claims, Wx financial rules
- Client services including program application/eligibility policies & procedures
- Client energy education and delivery of Wx information
- Procedural training on program forms, including WA (NEAT, MHEA) software
- Comprehensive program training including CT *Program Operations and Training Manual* and other policy sources.
- NASCSP On-Site Training visits

Weatherization Services Training: Training related to specific Wx functions is key to effective service delivery. Areas of expertise include training in:

Energy Audit & Final Inspection: Techniques, tools, testing used in all of the technical aspects of Wx; evaluation skills, building science; audit software/forms training

Weatherization Installation: Tools, techniques, & materials used in the installation of Wx measures; carpentry, spray foam techniques, ventilation; plumbing and electrical safety.

Crew Supervision: Technical training on every aspect of Wx; supervisory skills & human relations; specialized site safety training such as OSHA and LSW; proper use of protective equipment (PPE) and SDS.

Mechanical Systems: Tools, techniques, parts, and materials used in various areas of the installation of Wx mechanical measures; worst case draft testing (CAZ), combustion appliances, plumbing and electrical; other specific mechanical work; state certification.

Mobile Home Training for Auditors, Inspectors, and Installers: Tools, techniques, and materials used in auditing, inspecting, and installations including special aspects to weatherizing mobile homes.

Comprehensive training on SWS aligned CT Field Guides: Overall training on protocols and technical information needed for Wx work.

H&S Training: Wx work must be conducted in such a way as to avoid current and future harm to the client

and other residents, and Wx workers. H&S training is vital, including some of the following areas:

Indoor Air Quality: All training on the recognition and mitigation of IAQ issues, including mold, moisture, volatile compounds and so forth.

Combustion Appliance Safety

OSHA: Worker safety training for new Subgrantee staff and contractor staff.

Lead Safety: EPA Lead RRP Certified Renovator course.

Lead Safety Training Requirement: Unless there is existing evidence that a home has been certified lead-free, or the work is below lead threshold limits. The EPA Lead RRP rule requires that such work must be conducted under the supervision of a Certified Renovator.

**Note:** EPA rules apply to all work, not just weatherization DOE requires all individuals working on pre-1978 housing projects to complete the EPA LRRP course prior to performing work on any pre-1978 sites. A Certified Renovator is required to attend *an additional* EPA.

Certified Renovator course sponsored by an EPA-approved training center. If the Certified Renovator has previously attended the 8-hour LSW Course, the renovator *must* attend a 4-hour Lead RRP Refresher Course. If the Certified Renovator has not attended the 8-hour LSW course, they must attend an 8-hour EPA Certified Renovator course.

**Training Resources:** CT WAP has identified a single IREC certified training partner to deliver the ANSI accredited BPI HEP Certifications for Retrofit Installer, Crew Leader, Energy Auditor and Quality Control Inspector. Priority will be given to having CT WAP and key sub-grantee personnel engage in Quality Assurance Training in Q-2-18 Sample Curricula:

**Program Administration:** Training of WAP Program Administrators including State staff Subgrantee program

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Coordinators/Managers, and fiscal staff is essential to the success of the CTWAP. To continue to improve the knowledge and skills of Program Administrators, the State provides periodic training on topics relating to areas such as:

Fiscal Management

Program Management

Human Resources

Program Policies and Procedures

Additionally, staff may be encouraged to attend various national and regional meetings. Program administrative training may sometimes be mandated.

**Weatherization Program Coordinator/Manager:** WAP Coordinator/Manager is responsible for the day-to-day administration of CT- WAP at the Subgrantee level. The list of Coordinator/Manager needed areas of knowledge includes program administration, policies and procedures, applicable laws, rules and regulations, and technical protocols and methods. They also include the business of Wx: budgetary and other fiscal requirements; procurement rules; inventory control; human resources and training needs. The Program Coordinator/Manager must be able to manage the Wx staff, contractors, and manage a small construction/production -focused operation. Program Coordinators/Managers must attend the following trainings:

ASHRAE 62.2 2016

OSHA 10

BPI Envelope Professional Training

Weatherization Crew Worker Level

Weatherization Crew Worker Level II

Training designed to improve the management of the program may also be required. Training may include workshops at conferences featuring all aspects of program operations from quality assurance to financial management.

The State encourages Weatherization Coordinators/Managers to attend the various national and regional meetings and to attain BPI certification. Attendance records for all training must be maintained by the Subgrantee for review by the State during monitoring.

**Weatherization Directors Meeting:** Meetings/teleconferences with the Weatherization Directors who manage the program statewide and the Grantee staff will be held on a quarterly basis. These meetings are not only a vital forum for the formulation of policy, but also provide an opportunity for the interchange of ideas related to weatherization. This opportunity also provides effective training among the various state and local program grant partners.

**Utility Partners Meeting:** Meetings are also held in partnership with the utility company partners in the program who administer ratepayer-funded programs in coordination with the WAP grant, including the Home Energy Solutions-Income Eligible (HES-IE) program.

**Training Responsibilities:** A meaningful training curriculum works when all of the stakeholders participate fully in both the training, and in suggesting ways in which the curriculum may be designed and improved.

**Subgrantee Responsibilities**The Subgrantee is responsible for tracking compliance to training requirements

for all individuals at the local level, and for reporting on training participation in the State monitoring process.

Subgrantees should also provide information and suggestions regarding the training curriculum as local needs

are identified.

**Training Plan and Budget:** Prior to the development of the State Plan, the State works with the Subgrantee to determine training needs and plan for that Program Year's State-sponsored training activities. The Subgrantee may submit an additional request to the State for training activities not outlined in the State Plan. The Subgrantee may also obtain training for their staff and/or contractors through their T&TA funding. Subgrantee sponsored training requires a

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training request and State approval.

**Training Compliance Monitoring:** It is the Subgrantee's responsibility to maintain records confirming that all certification, licensing, and training are current. The Subgrantee must maintain an inventory of all training attended by individuals working on the weatherization program, whether it is with the Subgrantee itself or its contractors. The Subgrantee must also track all contractors' licenses for all contractors working in areas that require licensing.

The State will monitor the participation by the Subgrantee and Subgrantee contractors to ensure compliance with certification, licensing, and training requirements. Weatherization measures installed by untrained personnel, whether employed by the Subgrantee or by its contractors, may result in questioned and/or disallowed costs for the entirety of weatherization work completed on a unit.

**Retention Agreement:** Pursuant to DOE's Weatherization Program Notice 12-1, dated January 31, 2012, T&TA funds may also be used to train contractors at the Subgrantee level participating in the Program. In making the determination to pay for contractors' training, Subgrantees must secure a retention agreement in exchange for the training. The retention agreement shall require that contractors will work in the Program for a specific amount of time and must align with the cost of the T&TA provided.

**Contractor Responsibilities:** Given the continuous evolution of residential Wx practices, it is important for all individuals to maintain a strong knowledge of current best practices in the industry. Connecticut's contractors agree in contractual assurances that their Wx employees will participate fully in training appropriate to their work, as required by the Subgrantee and the State.

Contractors are also required to maintain current and proper licenses, and certifications, as required by law for their particular work.

The companies administering the Home Energy Solutions-Income Eligible (HES-IE) programs also participate in this process. WAP subgrantees also receive T&TA funds in their annual budget allocations and are encouraged to explore training and technical assistance opportunities that would specifically benefit their own staff and subcontractors.

Requests must be submitted to the State in writing for prior approval. All auditors and inspectors must complete and pass the BPI Certification training before they can either perform energy audits or conduct unit inspections. Client education is one of the most important parts of the audit process because it has been proven to significantly increase the potential for energy savings in the homes that are weatherized. All auditors and inspectors are trained in effective techniques of client education.

DOE conducted onsite monitoring in CT during Program Year 2018 that provided multiple aspects to consider additional training. CT WAP immediately responded by implementing comprehensive reviews and in-house trainings related to DOE's expressed concerns. During Program Year 2019 CT WAP will continue to focus on all of those areas as follows:

Best Practices related to Sidewall capping prior to Insulation measurement and verification.

Best practices related to NEAT/MHEA Modeling including:

Building component input details, itemized measures and the use of "Evaluate All" in developing recommended measures

ASHRAE 62.2-2016 calculation related to building Height above grade and as related to conditioned spaces

ASHRAE 62.2- 2016 End State Calculation "Best Practices"

Development of Comprehensive training planning

**Percent of overall trainings**

Comprehensive Trainings:	60.0
Specific Trainings:	40.0

**Breakdown of T&TA training budget**

Percent of budget allocated to Auditor/QCI trainings:	10.0
Percent of budget allocated to Crew/Installer trainings:	80.0
Percent of budget allocated to Management/Financial trainings:	10.0

**V.9 Energy Crisis and Disaster Plan**

Connecticut has developed a State Response Framework, which outlines the roles and interactions of the state government with local, federal, and tribal governments, non-governmental response organizations and other private sector partners, the media, and the public in implementing emergency response and recovery functions in times of crisis.

The Framework describes actions to be taken and general responses to disasters that have risen to statewide action. The Framework does

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not identify WAP as a resource for crisis or disaster response.

The State acknowledges that the use of WAP funds during a disaster is limited, as outlined in WPN 12-7.