

Connecticut Weatherization Assistance Program
State Plan Executive Summary, Program Year 2022

1 Introduction

The Connecticut Weatherization Assistance Program (WAP) provides low-income households across the state access to transformative and affordable energy efficiency improvements that reduce household energy expenditures. Over the course of five (5) years and during our last funding cycle (Program Year 2017 to 2021), Connecticut WAP weatherized 515 homes with lifetime savings of over \$7.2 million dollars. Connecticut WAP is on target to service many more households with an annual budget allocated through formula State funding for Program Year 2022 (PY22) totaling \$3,412,568 and with additional funding, pursuant to the Infrastructure Investment and Jobs Act (IIJA), amounting to \$46,215,781 over the next five years.

2 PY22 Goals

The goal of Connecticut WAP in PY22, is to leverage program delivery to address barriers to weatherization implementation that emerged during the COVID-19 pandemic. Connecticut WAP utilized needs assessments and sub-grantee reports to identify four (4) prominent barriers to program delivery. Those barriers are:

2.1 Economic Shocks

Economic shocks from COVID-19 and geo-political events have choked supply chains and increased the cost of materials, time and labor in the construction industry, causing weatherization project delays.

As such, Connecticut WAP is exploring utilizing existing cost data, contracting and construction best practices to buffer against market volatilities like these. The Program will require that PY22 program operators implement a Request for Proposals (RFP) for vendors to refresh unit cost pricing that was established in the previous funding cycle. The development of a cost database with historical price information collected from utility-managed energy affordability programs and previous sub-grantees will inform the process for the PY22 vendor RFP. Connecticut WAP will also explore opportunities to leverage funding from other government sources to establish up to a 20% contingency on project hard costs to account for budget overages.

2.2 Grantee and Sub-grantee organizational capacity was strained during the COVID-19 pandemic.

The Program will rollout an RFP for additional sub-grantees to accommodate the increase of operations from the outlay of IIJA funds. Grantee staff levels will increase by three-fold over the course of the 2022 calendar year. Because of social-distancing restrictions, critical hands-on training and workforce development programs were not readily available. The immediate need for training for weatherization

auditors, inspectors and contractors will be achieved through the Green Jobs Academy, New England's regional premier weatherization facility that provides certifications to auditors, inspectors and contractors.

2.3 Gap in Service to Multi-family Housing

Connecticut WAP has received conditional DOE approval for manufactured and single-family homes but not for multi-family housing, missing a critical opportunity to scale the program, to maximize energy and cost savings on projects and to reduce carbon emissions in historically overlooked markets.

In response, Connecticut WAP is developing programmatic and technical infrastructure for increases in staffing and operations to create and sustain weatherization services to the multi-family housing segment across the State. This will be executed by attaining approval from the Department of Energy (DOE) to deploy the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Level II audit tool for multi-family housing. Deployment of the audit tool will synchronize with the hiring of a technical monitor(s) with a specialty in multi-family weatherization to assist with operationalizing change across the whole Program. The Connecticut WAP Operations Manual and Technical Field Guide will integrate specifications for multi-family housing weatherization for quality control and assurance. A data management system is in the process of being procured to automate weatherization workflows. The system will integrate utility operations for income-eligible programs in an effort to identify deferrals. Connecticut WAP will continue market research on affordable multi-family housing in conference with Connecticut Housing Agencies and other key stakeholders to develop a state-wide strategy for multi-family weatherization. The Connecticut WAP Operations Manual and Technical Field Guide will be overhauled and will integrate Standard Work Specifications for multi-family housing.

2.4 Health and Safety Barriers

Health & Safety (H&S) Barriers such as mold, lead, asbestos and vermiculite impede the delivery of weatherization on income-eligible properties because they are required to be remediated before energy conservation measures can be deployed.

Connecticut WAP has created a pipeline of project leads for weatherization assistance through the Statewide Weatherization Barriers Remediation Program (WxBRP) that was developed in Program Year 2021 (PY). WxBRP was established as a three-year barrier remediation program that is targeted to remove H&S barriers in 1,000 CT homes. H&S deferrals from utility-managed energy affordability and Connecticut WAP will be fed into the barrier remediation program. The ultimate goal is to provide a pathway to high-performance affordable housing through low-income carveouts in energy program incentives.

3. Conclusion

Energy efficient buildings lead to lower energy costs for over-burdened households and addresses poor

social determinants of health by improving air quality. Connecticut WAP is targeting a variety of programmatic changes to address barriers while scaling up program delivery.

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(Grant Number: EE0009892, State: CT, Program Year: 2022)

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. Income does not include the exclusions identified in Department of Energy (DOE) Weatherization Assistance Program (WAP) guidance, WPN 22-3. Gross income should be used to determine eligibility, not net income. WAP eligibility is also extended to the Department of Housing and Urban Development (HUD) means-tested programs as outlined in WPN 22-5.

Describe what household eligibility basis will be used in the Program

The federal definition of low-income is in accordance with 10 C.F.R. § 440.22(a). A household is eligible for weatherization assistance if occupied by a family unit:

1. Whose income is at or below 200% of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget,
2. Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance; or
3. Who is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200% percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

Consistent with 10 C.F.R. § 440.22(a), CT WAP considers a household eligible for WAP once they are determined eligible for assistance for the Low-Income Energy Assistance Program (LIHEAP) under the Low-Income Energy Assistance Act of 1981. Administered by DSS, LIHEAP limits program participation to households at or below 60% of state median income. Once a household has been deemed eligible for LIHEAP assistance through the Connecticut Energy Assistance Program (CEAP), the household is also considered automatically eligible for WAP, subject to confirmation of LIHEAP eligibility by DEEP.

Note: The Grantee for CT WAP is the Department of Energy and Environmental Protection (DEEP). The Department of Social Services (DSS) administers the Low-Income Energy Assistance Program (LIHEAP).

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

A household may include "qualified aliens", as used in the Immigration and Nationality Act (INA), as follows (a) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 210 of the Immigration and Nationality Act by approval of an application and are categorized as Special Agricultural Workers (SAWS) who perform seasonal agricultural work during a specified period of time; or (b) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 245A and 210A of the Immigration and Nationality Act by approval of an application and who is aged, blind and/or disabled as defined in Section 1414 (a)(1) of the Social Security Act (Public Law 74271); or (c) Cuban or Haitian aliens as defined in Public Law 96422, Section 501(e). Clients are considered eligible during the application process if they demonstrate ownership of a "Green Card" or demonstrate permanent residence (I551 Alien Registration Card, Passport, I688 Employment Authorization Card, I766 Employment Authorization Document, I94 with R1 or R2 status designation).

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

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No dwelling unit may be weatherized without documentation of eligibility. At the Subgrantee level, all household income must be calculated per DOE requirements, and the Subgrantee must establish who occupies and owns the property as well as the household income through proper documentation.

Note: For further reference please see *CT WAP Operations Manual 2022 Section 203*.

Describe Reweatherization compliance

Since many households have never received weatherization services, the state policy documented in the CT WAP Operations Manual is that such homes will be prioritized. Dwelling units weatherized (including dwelling units partially weatherized) under WAP, or under other Federal programs such as, LIHEAP, Health and Human Services (HHS), the Department of Housing and Urban Development (HUD) and the US Department of Agriculture (USDA), may not receive further financial assistance for weatherization before 15 years. This does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) or from receiving non-Federal assistance for weatherization. All units that are eligible to be re-weatherized will receive a new energy audit.

CT WAP maintains an electronic database of all homes that have been weatherized under DOE WAP, LIHEAP, HUD and USDA fifteen or more years ago. Subgrantees are provided controlled access to this information for lookback purposes. 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.

Note: For further reference please see *CT WAP Operations Manual 2022 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 from households who are renting must be ranked and verified in the same manner as households owning the property in which they reside. In most circumstances, the owner/landlord must contribute to the cost of weatherizing a rental property. Financial contributions are not required of property owners who are themselves at an income level where they would be eligible for weatherization assistance. Mobile homes are eligible for weatherization as well and are reported with the other types of housing stock in the quarterly reports.

Note: For further reference please see *CT WAP Operations and Training Manual 2022 Section(s) 203.1, 203.2, 203.3, 203.9.3, 203.9.4*.

Describe how Rental Units/Multifamily Buildings will be addressed

Connecticut WAP, in accordance with 10 C.F.R. § 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 WAP will review and consult with DOE regarding any eligible structure brought under consideration for weatherization.

Connecticut WAP is currently conditionally approved by DOE to weatherize manufactured homes and single-family housing (8/27/2020) and will spend PY22 acquiring accreditations and specialized staff to deploy American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Level II audits in multi-family housing.

Weatherization Agreement

Landlords shall affirm by signed Weatherization Agreement that they 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 C.F.R. §§ 440.22(b)(3) and 440.22(e), tenants sign and receive a copy of the agreement, and therefore are aware of the conditions placed on the landlord. Landlords will also agree to charge the same rent to all successor tenants up to the two-year period covered by the Weatherization Agreement. In accordance with 10 C.F.R. §440.22(c), Connecticut may seek an agreement from the landlord whereby Connecticut reserves the right to seek a lien against the landlord's property in the event the landlord does not comply with rent increase or other prohibitions.

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The Weatherization 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.

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 (H&S) 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 Community Action Agency (CAA) representative. If the client is a renter, a copy is also sent to the landlord. Clients remain eligible, without eligibility reverification, for weatherization services if all H&S concerns triggering deferral are addressed within sixty (60) days of receipt. Should remediation take longer than that, eligibility must be reverified in accordance with State and Federal policy.

Connecticut WAP will implement the DOE Deferral Tracking Tool in PY22 to assist with deferral tracking. 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;
- 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 carbon dioxide levels in combustion appliances, high levels of formaldehyde or other pollutants and volatile organic compounds (VOCs), and cannot be resolved under existing guidelines;
- The extent and condition of lead-based paint in the building would potentially create further 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 H&S 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.

Buildings deferred due to H&S reasons may be routed to the Statewide Weatherization Barrier Remediation Program (WxBRP) before weatherization commences. In PY21, WxBRP was created by CT DEEP in conference with key stakeholders and members of EnergizeCT's Energy Efficiency Board (EEB) as a comprehensive strategy to remove H&S barriers such as, mold, lead and asbestos to ensure that direct benefits of energy efficiency improvements delivered by CT WAP are received by targeted beneficiaries.

Note: For further reference please see CT WAP Operations Manual 2022 Section(s) 204, 204.1, 204.2, 204.3, and 424.1

V.1.3 Definition of Children

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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.

Tribal organizations shall not be treated as local applicants. Rather, in accordance with 10 C.F.R. § 440.11, low-income members of an Indian tribe will receive benefits equivalent to the assistance provided to other low-income persons within Connecticut. Connecticut law recognizes five Indian tribes: (1) Golden Hill Paugussett, (2) Mashantucket Pequot, (3) Mohegan, (4) Paucatuck Eastern Pequot and (5) Schaghticok. These tribes occupy six (6) reservations within the State.

V.2 Selection of Areas to Be Served

Connecticut uses one or more entities authorized by 10 C.F.R. § 440.15 to deliver services as Subgrantees (subcontractors), which entities 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 Proposed State Plan, regardless of the number of actual Subgrantee(s)/subcontractor(s) in any given Program Year.

In Program Year 2022 (PY22), DEEP will continue to work with Subgrantees, the Community Renewal Team (CRT) and New Opportunities, Inc. (NOI), to weatherize manufactured homes and single-family housing with requirements to achieve production goals identified by region in the Proposed State Plan to ensure statewide delivery of services. Specifically, to ensure equitable geographic distribution, Connecticut 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. Connecticut believes this approach is necessary to ensure the delivery of services to WAP clients statewide.

Economic shocks caused by COVID-19 have exponentially increased the cost of materials, time and labor in construction. Existing Subgrantees will be required to implement a Request for Proposals (RFP) for new vendors in PY22 in order to refresh unit cost pricing that was established three years ago.

In PY22, Connecticut WAP will implement an RFP to identify and select additional Subgrantees for PY23 participation to account for the increase in the scale of operations from servicing multi-family housing and from additional federal funding pursuant to the (Infrastructure Investment Jobs Act (IIJA). IIJA funds have been allocated to Connecticut WAP totaling \$46,215,781 and will be disbursed over the course of five years.

Connecticut DEEP will seek the input of the Policy Advisory Council, Community Action Agencies, DSS, Connecticut Housing Agencies and other key stakeholders to assess how to improve the delivery of services statewide in PY22. Former Subgrantees and subcontractors are not precluded from seeking to provide services in PY22 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, Connecticut works to ensure that all Subgrantees maintain administrative, programmatic, and technical staff or vendors capable of operating a successful program.

V.3 Priorities

Clients determined eligible through LIHEAP procedures 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 \$2,500 or 6% of household income). DSS provides to DEEP, by region, the list of households eligible for LIHEAP.

High Energy Burden Priority

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Consistent with Operation Fuel's definition of high energy burden in *Home Energy Affordability in Connecticut: The Affordability Gap*, CT WAP considers households spending 6% or more of their household income on energy costs as High Energy Burden sites. Service delivery priority will be provided to those sites. Households with High Energy Burden are tracked in the monthly reporting template provided to CT WAP by each Subgrantee which is completed utilizing data from the Weatherization Assistant 8.9.1 software. This data is then aggregated quarterly and entered in the PAGE QPR.

V.4 Climatic Conditions

Connecticut 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 analyses.

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

The Weatherization Assistant 8.9 Audit tool utilizes Hartford, CT as the only weather file located within Connecticut. Connecticut WAP recognizes Hartford, CT as the city which best represents the average climate conditions within Connecticut at 5,278 heating degree days. All site-specific audits conducted within Connecticut will utilize Hartford, CT as the selected weather file.

In accordance with WPN 22-7 Table of Issues, where heating system repair or replacement is required when there is a documentable threat to the occupants' health and safety, those costs are allowable as H&S expenses.

Heating degree days were calculated through BizEE Degree Days software tool www.degreedays.net for a period of two (2) calendar years from 2020 through 2021.

Based on this information:

- The central part of the State (Hartford) averaged 5,513 heating degree days.
- The southeastern part of the state (Bridgeport) averaged 4,754 heating degree days.
- The northeast part of the State (Windham) averaged 5,686 heating degree days.
- The northwest part of the state (Waterbury) averaged 5,747 heating degree days.
- The southcentral part of the state (New Haven) averaged 4691 heating degree days.

Connecticut's average of 5,278 heating degree days justifies heating system repairs or replacement as a H&S measure. Cooling Degree Days are not used in PY22 analyses but will be considered in future program year analyses.

All National Energy Audit Tool (NEAT) and Manufactured Home Energy Audit Tool (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 Connecticut WAP is performed in accordance with the DOE-approved, energy audit procedures and 10 C.F.R. § 440 (Appendix A).

Note: All work performed and reported as completed must be in compliance with DOE WPN 22-4 and the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide Standard Work Specifications (SWS) Aligned Edition Version (022519), copyright 2019, The CT WAP Operations Manual (Revised 2022) and the current Year State Plan/Master File.

In PY22, DEEP will overhaul the existing Connecticut WAP Operations Manual to reflect the increase in the scale of operations to accommodate servicing multi-family buildings across the State.

In accordance with WPN 22-4, Connecticut WAP will provide Subgrantees and/or contractors with technical requirements for fieldwork including, but not limited to, audit/testing policy and procedures; installation of energy conservation measures (ECM), H&S, and incidental

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repair measures (IRM), and Final Inspections.

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

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

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

All documentation utilized for the purpose of executing contracted services and/or guiding fieldwork shall be fully aligned with Standard Work Specifications (SWS) and contains language that confirms Subgrantee and/or contractor's receipt, cognizance, and confirmation of communicated materials as referenced above. All work performed by Connecticut WAP Subgrantees and/or contractors must be consistent with Connecticut WAP SWS aligned Field standards and SWS aligned Field Guides.

Connecticut WAP has provided electronic links on the program webpage to the Connecticut WAP Quality Work Plan, Connecticut Weatherization Field Guide SWS Aligned Edition (083021) and the Connecticut WAP Operations Manual (Revised 2022) 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.

Connecticut WAP shall ensure that all activities will comply with DEEP's Historic Preservation Programmatic Agreement (PA) (2020) and DEEP's NEPA determination. Any activities pursued outside of the allowable activities of the PA or the NEPA Determination shall require an Environmental Questionnaire (EQ1) to be submitted to DOE for review. Both the PA and NEPA Determinations shall be made available to CT WAP Subgrantees.

Connecticut WAP has produced work quality standards that continuously align with DOE WPN 22-4, The CT WAP Quality Work Plan, CT Weatherization Field Guide SWS Aligned Edition (083021), and the current year State Plan/Master File.

Connecticut WAP Monitoring shall conduct an ongoing assessment of Subgrantee staff and contracted resources to ensure that all personnel engaged in installed measures are aware and practicing work standards in compliance with DOE WPN 22-4, The Connecticut WAP Quality Work Plan (2022), The Connecticut Weatherization Field Guide SWS Aligned Edition (083021), The Connecticut WAP Operations Manual (Revised 2022) Edition and the current year State Plan/Master File.

Connecticut WAP Monitoring shall ensure that 100% of weatherized homes are inspected in compliance with DOE WPN 22-4, The Connecticut WAP Quality Work Plan (2022), The Connecticut WAP Weatherization Field Guide SWS Aligned Edition (022519), The CT WAP Operations Manual (Revised 2022) Edition and the current year State Plan/Master File.

Connecticut WAP Subgrantee contracts for services with weatherization contractors must also include an acknowledgment of the receipt of communication of links to the Connecticut WAP Field Guide, SWSs, and Standards as outlined in DOE WPN 22-4 Section 2.

Additional Program Information

During PY22 spending limits have been established as follows:

- Up to \$10,000 on ECMs, including Ancillary and Incidental Repair Measures and Program Support Costs, or submit a request for prior Grantee Approval.
- Up to \$1,500 for H&S Measures or submit a request for prior Grantee approval.
- Up to \$2,500 for Incidental Repair Costs or submit a request for prior Grantee approval.

Definitions of allowable repairs are as follows:

Major Repairs: Repairs where the cost exceeds \$750. Examples of major repairs include, but are not limited to: Repairing roof leaks, repairing unsafe electrical wiring, and removal of knob and tube wiring for the purpose of installing attic and sidewall insulation.

Incidental Repairs: Repairs necessary for the effective performance or preservation of weatherization installations are allowed for repairing roof leaks, repairing unsafe electrical wiring, and removal of knob and tube wiring for the purpose of installing attic and sidewall insulation. Repairs must be consistent with DOE WPN 19-5.

Minor Repairs: Repairs that may be considered Incidental Repair measures, under \$500 may include cut and finish, access to attics and knee walls, siding repairs, and minor repairs associated with windows, doors, flashing, and masonry moisture infiltration points.

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In all cases, the WAP client file must provide clear documentation of the need for the repairs and the relationship with the energy conservation measures that are enhanced or protected directly related to the repair. Documentation must include pictures and detailed descriptions of the repairs and invoiced costs presented by the contractor.

Note: See WAP Operations Manual Section 311 and Section 702

Example contract language used in all Subgrantee contracts:

"All work performed must be in compliance with the DOE and CT WAP guidance, the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide SWS Aligned Edition, and the current CT WAP State Plan, available on DEEP's webpage."

Field guide types approval dates

Single-Family: 8/13/2021
Manufactured Housing: 8/13/2021
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 (8/27/2020) to continue to utilize the Site-specific, Weatherization Assistant 8.9 (NEAT) Audit tool software. Only measures that achieve an individual SIR of 1 or more are allowed.
Approval Date: 8/27/2020

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
CT WAP is DOE-approved (8/27/2020) to use the MHEA audit tool software to respond to manufactured home service requests.
Approval Date: 8/27/2020

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

<p>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.</p> <p>Statelevel Experts continue to closely monitor the NEAT audit tool proficiency of all Subgrantees. SWS aligned QWP-22 Setup libraries will be distributed by July 15, 2022.</p> <p>* Multifamil: During Program Year 2022, CT WAP will continue to direct Subgrantees to refer all large multifamily weatherization requests to the state's utilitybased weatherization programs, which can provide comprehensive weatherization services to these sites. Connecticut WAP continues to see this type of housing as being less than 20% of the housing stock. The state will review, revise and recommend a complete energy audit package for each Multifamily building addressed in WAP for DOE approval.</p>

V.5.3 Final Inspection

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The Connecticut WAP mechanism for adjusting Quality Control Inspector (QCI) Final Inspection and QCI In-Process Monitoring rates is based on results and information captured within the Connecticut WAP Quality Control Inspection Report (QCI, QWP22) and the Connecticut WAP Inspection Tracker PY22 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.

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

Connecticut WAP policy maintains that QCI In-Process Monitoring will be conducted on 10% of all production units as well. CRT and NOI complete QCI's on all homes reported to our office.

Note: All Final QCI Inspection conducted on work performed and reported as DOE completed ConnecticutWAP sites must be in compliance with DOE WPN 22-4 and the Connecticut WAP Quality Work Plan requirements, Connecticut WAP Weatherization Field Guide SWS Aligned Edition (083021), 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 Connecticut WAP approval.

Failure of any person to achieve QCI Certification will result in a temporary suspension from additional "comprehensive" training opportunities. Please see attached Connecticut WAP Quality Control Inspection Report (QCI QWP-22) and Connecticut WAP Quality Work Plan.

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

- Independent QCI: This individual 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 cannot be involved in actual installation of measures at the site.

Note: When subgrantees use the Auditor/QCI model, Connecticut WAP will increase quality assurance monitoring to a minimum of 10% of all completed units. In addition, ConnecticutWAP 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 PY22, Connecticut WAP anticipates an increasing volume of unit completions throughout the PY. The existing Subgrantee staffing provides two dual role Auditor/Inspector(s). The ConnecticutWAP Training Plan for PY2022 includes training to ensure an additional two Auditor/Inspector(s). Connecticut WAP will monitor the program at a minimum of 10% of all completed units and assess inspection quality and capacity throughout PY22.

For additional information see the response to V.8.4 Training and Technical Assistance Approach (PY 2022 Comprehensive Training).

Connecticut WAP will provide specific tracking to evaluate the QCI Inspection process to document the range of controls outlined in WPN 22-4. 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 (1) asterisk * is noted for any missed opportunity or single installed measure deficiency.
- Two (2) asterisks ** are noted for any singleH&S missed opportunity or deficiency in addressing H&S issues found at the site.
- Three (3) asterisks *** 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 the assessment of the effectiveness of 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. Subgrantee or Subcontractor ultimately addresses all concerns and demonstrates improvement (subject to increased monitoring and

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inspection).

- 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 Connecticut analyses of effectiveness will be conducted in compliance with DOE WPN 22-4 and the CT WAP Quality Work Plan (2022) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition (083021), 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 DOE WPN 20-4, and 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 Building Weatherization Report (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 the monitoring state.

Productivity and energy savings (tied to productivity) are compared 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 levels. 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 is 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 Lead Renovation, Repair, and Painting (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.

Connecticut 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 Home Energy Solutions Income-Eligible (HES-IE) 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) to improve service delivery.

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V.7 Health and Safety

Connecticut WAP has implemented policies and procedures to address health and safety considerations. These are included in the CT WAP Operations Manual: Sec. 400 Health and Safety (QWP 2022) (WPN 22-7).

Connecticut WAP recognizes that conducting site-specific assessments, installed measures, quality assurance, and quality control services will present a range of hazards not previously encountered in the WAP. As federal and state policy and procedures are implemented, Connecticut WAP will continuously update the Health and Safety Plan, Operations manual, Field Guide, and related guidance and forms to address how these aspects are managed and tracked from client intake and prioritization of services through unit completion.

Connecticut WAP has begun to develop Training and Technical Assistance Planning to address the post-COVID-19 workplace challenges. As federal and state policy is implemented, Connecticut WAP will respond as needed to remain in compliance with all authorities governing WAP service delivery, the current T&TA budgets have been reviewed and allowances have been made for Health and Safety training specific to this demand and will be tracked accordingly.

V.8 Program Management

V.8.1 Overview and Organization

WAP administrative policies and procedures are outlined in Section 100 of the CT WAP 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 Connecticut DEEP. The Connecticut WAP is administered by the Bureau of Energy and Technology Policy (BETP) and is overseen by the Deputy Commissioner. BETP's Bureau Chief oversees the operations of the DEEP staff and Subgrantees delivering the program.

DEEP also has oversight of the ratepayer-funded and utility-administered residential low-income energy program known as HES-IE. The HES-IE program serves the same population as WAP in Connecticut and currently cost shares many measures reported on DOE WAP units. The alignment of the HES-IE program with WAP is a near-term goal of DEEP to ensure the best quality service for the low-income population.

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

BETP 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

Not more than 15% of any grant made to a State may be used by the Grantee and Subgrantees for administrative purposes in carrying out duties under this part, except that not more than 7.5 percent may be used by the State for such purposes, and not less than 7.5 percent must be made available to Subgrantees by States. A State may provide in its annual plan for recipients of grants of less than \$350,000 to use up to an additional 5 percent of such grants for administration if the State has determined that such recipient requires such additional amount to implement effectively the administrative requirements established by DOE pursuant to this part (10 C.F.R. § 440.18 (e)).

For PY22, CT WAP will be distributing the Administrative allocation as follows:

- DEEP – 5%
- Community Renewal Team – 5%
- New Opportunities, Inc. – 5%

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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 (2022) requirements, Connecticut Weatherization Assistance Program Weatherization Field Guide Standard Work Specifications Aligned Edition (083021), and the current year State Plan/Master File. (For further information refer to the 2022 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 Manual (2022) Sections 300, 400, 500, 600, and 800 and the CT WAP SWS-aligned Field Guide (2022). WPN: 22-4

Subgrantee Monitoring

- The CT WAP Operations Manual (2022) Sections 100, 300, 400, 500, 600, and 700 and the CT WAP SWS-aligned Field Guide (2022).

CT WAP utilizes WPN 20-4, 22-4, and attachment 1 updated Checklists and Operations Manual content specific Subgrantee monitoring activities.

Note: During the current program year, Connecticut 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 20-4 and 22-4 Guidance and all other applicable DOE Guidance. Connecticut WAP will perform comprehensive onsite 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 onsite monitoring.

In alignment with WPN 20-4 and 22-4, more frequent monitoring will be conducted at Subgrantees that have been identified as having significant deficiencies. The individual onsite monitoring activities are structured as follows:

- Comprehensive Administrative/ Fiscal Monitoring (annual) based on PY22 allocation.
- Technical Site Visit Monitoring (minimum of 10% of completed units and a minimum of 20% file review of completed units)

Note: While this exceeds DOE minimum standards, the recent audit tool implementation and QWP22 standards compliance warrant additional activities to ensure the best outcomes. Actual program year totals may be adjusted to DOE minimum levels if midyear assessments indicate consistent acceptable performance at any Subgrantee.

Connecticut 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, Connecticut WAP requires the Subgrantee to submit their most recent 2 CFR 200 Financial Audit. These audits are reviewed and approved by DEEP's Business Office. Connecticut WAP will continue to contract the services of a Technical and Monitoring Compliance Consultant via a T&TA Subaward(s) to provide all Quality Control Inspections and field monitoring services. A dedicated, fulltime, Technical Monitor, employed or contracted by DEEP will continue to provide monitoring and support services under the direction of Weatherization Program Management. Connecticut WAP anticipates that Subgrantees will utilize components of the DOE prescribed standard options to conduct Quality Control Inspections as defined in WPN 22-4.

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

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including; independent status, role in the audit process, and role in any measure installation(s).

- 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 resources:

- Two (2) Contractors who serve as Quality Control Inspector/Technical Monitoring Compliance Consultant/Technical Support
- Full time, 40 hours/week
- Compensation: 100% Grantee T&TA (To include POV Travel & Expenses)

Weatherization State Team Members and their responsibilities for monitoring:

Position	Research Analyst
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	Programmatic performance and compliance
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

Position	Research Analyst
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	Workforce development and outreach
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

Position	Associate Research Analyst
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	Fiscal monitoring and contracting
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

Position	Supervising Accountant
Office	Central Business Office/Federal Grants Division
Responsibilities	Fiscal monitoring and compliance
Compensation	State Funding
Travel/Training Funding	100% Federal funding

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 Connecticut. Technical monitor(s) possess BPI EA/QCI certifications.

- CT Annual Administrative Review Monitoring Tool
- CT Annual Administrative Review Fiscal Monitoring Tool
- CT Field Monitoring Tool for File Review and onsite 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.

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Connecticut WAP reserves the right to disallow any costs associated with any discrepancies 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 noncompliant with either State or Federal requirements. Such findings may include, but are not limited to:

- Consistent production of substandard 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.

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

Additional Monitoring will be conducted if Subgrantee(s) is(are) 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. Additional information will be included in the attached T&TA Planning and Reporting template.

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

Technical Monitoring selects projects in various stages of completion and for specific measures to further evaluate Subgrantee's 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 OnSite Field Review CT WAP Field Visit Form
- DOE WPN 20-4 and 22-4

Note: All Technical Compliance Monitoring will be conducted in compliance with DOE WPN 224 and the CT WAP Quality Work Plan (2022) requirements, CT WAP Weatherization Filed Guided SWS Aligned Edition (083021), and the current year State Plan/Master File and USDOE WPN 227 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, except for 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 act on 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.

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

- Consistent production of substandard workmanship, with no measurable improvement within 90 days of notification.
- Inadequate fiscal and or Management policy, procedures, enforcement, and controls.

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

DOE allocates Training and Technical Assistance (T&TA) funding to the states. T&TA funds support state program operations such as analysis, measurement and documentation of program performance, skill development, and local monitoring, to improve program effectiveness.

To ensure the consistent delivery of high-quality weatherization services nationwide the DOE, through a network of Weatherization Professionals, identified and developed a set of core competencies for the various staff positions that implement WAP including the types of training required to increase levels of core competencies for these job categories. The goal is to increase the levels of competencies and expertise in the workforce so that every house that is weatherized receives appropriate, properly installed cost-effective measures.

Although many of the core competencies and job classifications identified are universal, not all the core competencies will be 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 a heating, ventilation, and air conditioning (HVAC) contractor is licensed by the state does not mean he possesses the competencies required. Additional training for these contractors may be required, or someone at the local agency must be competent to specify what work the contractor must complete and to verify that the completed work complies with WAP's technical standards.

The DOE also places certain requirements for training and certification including General Hazardous Materials Awareness and specialized curriculum as follows:

Lead Safe Weatherization (LSW) training for all workers (Optional)

- At least one onsite worker must be an EPA Certified Renovator (RRP)
- EPA RRP training for all State Monitors (Optional)

Connecticut is committed to increasing the WAP network's expertise. Numerous program training opportunities and hands-on workshops have been conducted with the goal to maximize energy savings, minimizing production costs, improving the quality of work, and fostering management expertise. In Connecticut, T&TA funds are primarily used to train state and local weatherization staff on program operations, management, and technical topics. Staff members receive training at national and regional conferences, regional and state training centers, state and Subgrantee provided workshops, and in the field.

Quality Control Inspection personnel must complete DOE-approved Comprehensive Training and possess knowledge, skills, and abilities as listed in the National Renewable Energy Laboratories Job Task Analysis and become certified by the Building Performance Institute as a Home Energy Professional Quality Control Inspector.

Connecticut WAP Recognizes DOE WPN 22-4 and will implement enhanced training, planning, and tracking that defines training and certification intervals for new hires and the incumbent workforce that are aligned with current NREL Home Energy Professional (HEP) certifications and the position for which the worker is employed.

Please see the Attached T&TA Plan and Section 500 of the Connecticut Weatherization Operations Manual for more detail regarding Connecticut's T&TA Activities.

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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:	25.0
Percent of budget allocated to Crew/Installer trainings:	50.0
Percent of budget allocated to Management/Financial trainings:	25.0

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, nongovernmental 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 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.

The primary energy-related crisis facing low-income households in CT is an inoperable heating system during the heating season defined as (October 1 - April 30). WAP eligible households will receive priority service delivery to conduct comprehensive site-specific health, safety, and energy efficiency assessments and initiate heating system diagnostics and repair or replacement proposals. Connecticut WAP Subgrantees will ensure that appropriate actions are taken to address heating-related responses in a timely manner and deliver high-quality comprehensive weatherization to all sites receiving emergency heating services.

In the event of a Federal or State declared disaster, Subgrantees may use DOE WAP funds to the extent that services are in support of typical weatherization work and shall reprioritize eligible units within a designated area of a declared disaster.

Allowable expenditures are limited to measures as defined in:

- 10 CFR 440.16 (b)
- 10 CFR 440.18 (D) (15)
- DOE WPN 22-7
- The Current CT WAP State Plan/Master File

Note: The subgrantee must determine all insurance claims and other forms of compensation related to damage associated with a Federal or State Disaster Designation.

Crisis Planning is permissible when On-Site WAP Service Delivery is suspended due to Public Health Concerns.

Connecticut WAP will provide limited short-term (30-90 day) guidance with respect to the use of DOE WAP funds for the purpose of ensuring program integrity and service delivery of work-in-progress and preproduction activities associated with the completion of WAP units. ALL costs will be directly accrued to Average Unit Costs for the respective program year.

Connecticut WAP will also provide longterm (90-180 day) guidance with respect to the use of DOE WAP training and technical assistance funds for the purpose of maintaining the integrity and capacity of the Connecticut WAP service delivery network at the State and Local agency levels and report all costs within the respective program year.