

[DRAFT]

Program Year 2026 – Annual Weatherization Assistance Program (WAP) Application (State Plan)

Connecticut Department of Energy & Environmental Protection (DEEP)

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

Description of the definition of income used to determine eligibility

Income means cash receipts the applicant earned and/or received before taxes. Income does not include the exclusions identified in the US Department of Energy (DOE) Weatherization Assistance Program (WAP) guidance WPN 25-3. Eligibility is determined based on gross income, not net income.

All households which contain a member who has received cash assistance payments during the preceding twelve-month period under Titles IV and XVI of the Social Security Act, Pub. L. No 88-452, 42 USC Section 2701 et. Seq or applicable state or local law are eligible for Weatherization Services. WAP eligibility is also extended to the Department of Housing and Urban Development (HUD) means tested programs as outlined in WPN 22-5.

Description of 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:

- 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;
- 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
- Who is eligible for assistance under the Low- Income Home Energy Assistance Act of 1981, provided that such basis is at or below 200% percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

DEEP also considers a household eligible for WAP if they are determined eligible for assistance from the Low- Income Home Energy Assistance Program (LIHEAP) under the Low-Income Energy Assistance Act of 1981. Administered by Connecticut's Department of Social Services (DSS), LIHEAP sets program participation to households at or below 60% of state median income (SMI). 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 DEEP. DSS administers LIHEAP also known as CEAP.

- Anyone who is eligible for assistance under a HUD means-tested program, is categorically eligible per the guidelines set forth in WPN 22-5 and consistent with 42 U.S Code § 6863(b)(3).
- Anyone who is eligible for assistance under a USDA means-tested program is categorically eligible per the guidelines set forth in WPN 25-4
- Anyone who is eligible for assistance under Connecticut’s Conservation & Load Management weatherization program for low-income persons: Home Energy Solutions – Income Eligible (HES-IE) who has been approved through the 2025-2026 HES-IE application, subject to data availability from the HES-IE program operators is eligible to receive WAP services provided the income threshold for this program is 60% SMI, the same as the income threshold for LIHEAP.

Note: The HES-IE application does not have an asset test. For information about how the HES-IE program performs income qualification, see the 2025-2026 Heating Season HES-IE application at <https://www.energizect.com/media/15366/download?inline>.

Describe the process for ensuring weatherization services are only provided to eligible populations

CT WAP services may only be provided to eligible populations. An eligible household member is any individual who is a U.S. citizen or “qualified alien” and meets other program eligibility requirements (e.g., income and building type). Subgrantees are directed to review the LIHEAP IM HHS Guidance on the Use of Social Security Numbers (SSNs) and Citizenship Status Verification (<https://acf.gov/ocs/policy-guidance/liheap-im-hhs-guidance-use-social-security-numbers-ssns-and-citizenship-status>) and the LIHEAP IM 2023-03 Assistance for Eligible Household Members Residing with Ineligible Household Members (<https://acf.gov/ocs/policy-guidance/liheap-im-2023-03-assistance-eligible-household-members-residing-ineligible>) for additional guidance.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units to be weatherized have eligibility documentation

No dwelling unit may be weatherized without documentation of eligibility. At the Subgrantee level, all household income must be calculated in accordance with DOE requirements. The Subgrantee must also establish who occupies and owns the property and the household income through proper documentation.

Subgrantees are required to verify home ownership by contacting the local assessor’s office for a copy of the deed. After review, if the client is not listed on the deed or if there are individuals on the deed who are not listed on the application materials, further review by the Subgrantee is required. This additional review may take the form of a client interview in conjunction with a request for back-up documentation verifying the information obtained in the interview. See the Documentation of Ownership section in the 2026 CT WAP Operations Manual. This process is also relevant to renters. Subgrantees are required to verify income for renters as part of the WAP eligibility process.

All households which contain a member who has received cash assistance payments during the preceding twelve-month period under Titles IV and XVI of the Social Security Act, Pub. L. No 88-452, 42 USC Section 2701 et. Seq or applicable state or local law are eligible for Weatherization Services. Additionally, verification of income eligibility is completed through a combined application process for CT WAP and CEAP. Once a household has been determined eligible for CEAP benefits, that household is deemed automatically eligible for CTWAP. A client is financially eligible for CEAP if the total, annual gross income of the household is at or below 60% of the state median income, adjusted for household size. Some examples of documentation that would verify eligibility for CEAP include documentation of income (e.g., W-2 forms), documentation of liquid assets (i.e., checking and savings accounts, stocks, bonds, retirement accounts, etc.), and proof of receipt of Temporary Family Assistance or other state or federal cash assistance programs. All documentation of income gathered for CEAP or HES-IE eligibility must be verified by DEEP staff to confirm eligibility. Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

Additionally, all HUD means-tested properties are categorically eligible to receive weatherization services utilizing existing procedures, processes, and documentation to reduce the burden of the low-income household caused by applying and submitting the same income verification documentation to multiple federal programs. DEEP will work with the Subgrantee network to create a process to serve all categorically qualified households.

DEEP will work with DOE and the administrators of the utility managed energy efficiency programs to determine the feasibility of categorically qualifying households to receive weatherization service once they have been means-tested through the HES-IE program.

DEEP has signed a Programmatic Agreement with the State Historic Preservation Office (SHPO) which is used to determine which weatherization measures may be installed in a historic property.

Re-weatherization compliance

Since many households have never received weatherization services, the state policy set forth in the 2026 CT WAP Operations Manual is that such homes will be prioritized over previously weatherized houses. 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 within 15 years of project completion. 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. CTWAP maintains an electronic database of -homes that were weatherized under DOE WAP, LIHEAP, HUD, and USDA fifteen or less years ago. Subgrantees are provided full access to this information for

lookback purposes. The Grantee limits and monitors the number of such dwellings that each Subgrantee may re-weatherize. Homes re-weatherized under WAP, LIHEAP, HHS, HUD, and/or USDA in the past 15 years are not eligible to be re-weatherized in CT.

Note: Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

Structures 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 unit on the basis that it is a 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 can contribute to the cost of weatherizing a rental property. However, financial contributions are never required. The owner/ landlord may choose to contribute to reduce the amount paid by WAP. Doing so can improve the SIR and allow for additional measures to be installed in the unit(s) that may have previously been too expensive to qualify. Mobile homes are eligible for weatherization as well and are reported with the other types of housing stock in the quarterly reports. Caution must be exercised when dealing with non-traditional dwelling units such as shelters, apartments over commercial properties, etc. to ensure that they are eligible. Weatherization of these properties must be reviewed and approved by DOE POs prior to weatherization. Weatherization of non-stationary campers and trailers that do not have a mailing address associated with eligible applicants is not allowed. The use of a PO Box for non-stationary campers or trailers does not meet this requirement.

Note: Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

Addressing rental units and multifamily buildings

In Connecticut the Grantee shall ensure all rental units are served in accordance with the 10 CFR § 440.22(b)(3), 10 CFR § 440.22 (c)-(e). To ensure compliance, DEEP has developed processes and procedures to ensure that:

- Written permission of the building owner or authorized agent is obtained before commencing work;
- Benefits of the services primarily accrue to low-income tenants residing in such units;
- For a reasonable period after completion, the household will not be subjected to rent increases, unless those increases are demonstrably related to other matters than the weatherization work performed;
- Adequate procedures are in place whereby the Grantee can receive tenant complaints and owners can appeal should rental increases occur and;
- No undue or excessive enhancement shall occur to the value of the dwelling unit. A properly executed energy audit with an energy conservation measure (ECM) of 1 or greater would not

constitute an undue enhancement.

The Weatherization Agreement for Non-Owner-Occupied structures that shall be used during Program Year 2026 contains language requiring the Property Owner to add language to the lease agreement that protects tenants from rent increases due solely to improvements provided by WAP funds. For more details, please see the section below on Weatherization Agreements.

Connecticut WAP will review and consult with DOE regarding any eligible rental structure brought under consideration for weatherization and all rental properties will be serviced in accordance with the policies and processes outlined in WPN 22-13.

Please see the Owner-Occupied and Non-Owner Occupied Weatherization Agreements for additional information on how DEEP will comply with protecting the federal investment and address issues of eviction, foreclosure, and sale of property.

Determination of Ineligibility

The Subgrantee shall adhere to its internal process, approved by DEEP, in all cases of determination of ineligibility. If a Subgrantee determines that an application is ineligible for services, it must provide the applicant with a written Notice of Ineligibility and create and retain a Closed Client File in accordance with the requirements set forth in the WAP Operations Manual.

Weatherization Agreements

Owner-Occupied

Homeowners shall sign the Single-Family Owner-Occupied Weatherization Services Agreement before any work begins on the property. This agreement establishes the roles and responsibilities of both the Owner and the Subgrantee providing weatherization services. Additionally, the document establishes DEEP's enforceable rights as the Grantee under the agreement. To protect the federal investment of WAP funds, the Owner must confirm in the Agreement that their home is not currently in foreclosure or listed for sale and, to the best of the Owner's knowledge, there are no plans to sell the property or for any government agency, bank, or other lender to take ownership of the property within 12 months of the weatherization work being completed. The Owner also acknowledges that if they breach any terms of the Single-Family Owner-Occupied Weatherization Services Agreement, they may be required to repay an amount equal to the cost of the CT WAP improvements to DEEP or the Service Provider.

Non-Owner Occupied

Property owners affirm by signing the Non-Owner-Occupied Weatherization Services Agreement that the benefits of weatherization will accrue primarily to the tenants, and landlords agree not to increase the rent for any unit in the property for a period of two years from the completion date of the weatherization work unless they can demonstrate that the increase is related to matters other than the weatherization work 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 also agree to charge the same rent to all successor tenants up to the two-year period covered by the Weatherization Agreement. Connecticut may require the landlord to repay an amount equal to the cost of the CT WAP improvements to DEEP or the Service Provider if the landlord breached the Agreement, and in accordance with 10 C.F.R. §440.22(c), may include in the Agreement that the landlord consents to placement of a lien against its property in the event the landlord does not comply with the rent increase or other prohibitions.

The Weatherization Agreement prohibits no cause evictions in addition to rent increases due to weatherization work that is done. If a complaint is filed, DEEP will have the property owner/landlord verify that such actions are justifiable.

In addition to the policy and procedures for rental properties, rental units/ multifamily properties are also subject to the following policies:

- Encouragement of financial participation, when feasible, from property owners.
- Duplex (2-unit) and quadraplex (4-unit) buildings are considered eligible if at least 50% of the units are income eligible. In triplex (3-unit) buildings, 66% or more of the units must be income eligible to receive weatherization services.

DEEP will work with our Subgrantees to ramp up small multifamily (2-4-unit) building service in Program Year 2026. DEEP will determine a reasonable ramp up rate through conversations with the Subgrantees. In PY26, DEEP has a goal of serving at least 22 small multifamily buildings. PY26 formula funds will not be used to weatherize buildings larger than 4 units.

In Connecticut all multifamily housing will be serviced in accordance with the policies and processes outlined in WPN 22-12.

Deferral Policy

A unit shall be deferred when existing conditions prevent the safe and effective installation of weatherization measures in accordance with program standards, or when such conditions cannot be reasonably addressed using WAP resources. Whenever a unit is deferred for any reason, the Subgrantee must notify the client through the Notice of Deferral either by hand delivery, electronic delivery (e.g., email), or regular mail. In the case of rentals, the Subgrantee will send the Notice of Deferral to the property owner, with a copy to the occupants of the unit. In some instances, the property owner is responsible for alleviating the identified issue(s) and must do so before the building can receive weatherization services. The client must sign the Notice of Deferral, and a copy of the signed Notice of Deferral must be included in the Client File. The Notice of Deferral must:

- Identify the specific reason(s) for deferral;
- Include an adequate timeline for resolution of conditions;

- Be signed by the Client and the Subgrantee; and
- Be completed by the Subgrantee and a copy provided to the Client.

Deferrals may occur at any phase of the weatherization process. Subgrantee staff or weatherization contractors must recommend the deferral of work at any point when a health and safety risk to the occupants or workers is identified. Deferrals are to be reviewed and approved by the Subgrantee management and fully documented in the Client File. Additional details on when and why a project may be deferred are set forth in the latest version of the CT WAP Operations Manual.

Subgrantees must have an internal deferral process, approved by DEEP, and in compliance with CT WAP's Deferral Policy.

Deferral Tracking

The Subgrantee shall maintain a list of units and buildings that are deferred, which shall include the address, date, and reason for deferral. If a deferred unit is ultimately removed from the Program, the Subgrantee must retain and maintain a Closed Client File. A list of what must be kept in the Closed Client File is set forth in the CT WAP Operations Manual.

Referrals

When a project is deferred, Subgrantees should suggest solutions, including alternative resources that may be available to address each basis for deferral. Where appropriate, referrals may be made to alternative resources.

Addressing Deferred Units

If the Subgrantee confirms that the conditions specified in the Notice of Deferral are addressed, and the Subgrantee has verified that the Client is still eligible for WAP services, the project must be prioritized for service. If the Subgrantee is not able to verify that the Client is still eligible, or the unit no longer qualifies, then the Client cannot be added back to the queue and must reapply for WAP services based on the current eligibility requirements. If the conditions specified on the Notice of Deferral are not remedied within the timeframe provided, an extension of time may be granted if, in the judgment of the Subgrantee's weatherization Program management, the owner is making progress on the underlying issues and may be expected to resolve the problem within a reasonably extended time period. If the conditions are not remedied within a reasonable timeframe, after all extensions have expired, the Subgrantee must complete the appropriate section of the Notice of Deferral, provide a copy to the Client, remove the project from the Program, and create a Closed Client File.

Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

Appeals Process

Clients that have been deferred from receiving weatherization services may appeal using the process set forth in the CT WAP Operations Manual.

Subgrantees are to return any appeal received after the fifteen (15) business day appeal period with a notice stating that the appeal cannot be considered as it was submitted beyond the deadline. Subgrantees may use their own official procedure for hearing and appeal decisions after the procedure has been approved by DEEP. Additional details about the appeal process are set forth in the latest version of the CT WAP Operations Manual.

Appeal decisions must clearly state the acceptance or denial of the appeal. If accepted, the weatherization process continues. If the appeal is denied, the notice must state:

- That the appeal has been reviewed and denied; and
- That the appellant has a right to final appeal to DEEP; and
- That the appellant has an additional ten (10) business days from the date of the second letter to appeal to DEEP; and
- The procedure required to be used to appeal to DEEP.

Weatherization Readiness Funds

Weatherization Readiness Funds (WRF) are designated for use by Grantees to address necessary repairs such as health and safety, structural issues, etc. that may be barriers to Weatherization Activities being funded by the US Department of Energy Weatherization Assistance Program (WAP).

This funding is intended to supplement not supplant the standard weatherization funds and must be used on necessary repairs, cleanup, and remediation needs of the physical dwelling itself that, if left uncorrected, has led, or would lead to a deferral under the Grantee’s deferral policy; and if corrected, will lead to DOE completion. A DOE completion is a dwelling that has received a DOE-approved energy audit, at least one DOE-funded allowable energy conservation measure has been installed, and weatherization work has been completed.

Distribution of Weatherization Readiness Funds:

The State of Connecticut has been allocated \$383,625 for PY 25 and will allocate the funding in the following manner. WRF will only be used in jobs funded by WAP formula funds:

CT WAP Weatherization Readiness Funding	
Connecticut Weatherization Assistance Program (CT WAP) Subgrantees	Amount of Funding
Community Renewal Team (CRT)	\$191,812
Center for EcoTechnology, Inc (CET)	\$191,813
Total	\$383,625

WRF Maximum Per Unit

The Maximum Per Unit spent to address necessary repairs (health and safety, structural issues, etc.) that may be barriers will be set at \$30,000.

Prioritization of Dwellings

WRF prioritization will follow the prioritization criteria used by the WAP program. Additional consideration may be given to projects with barriers that fall within the WRF Maximum Cost Per Unit (MCPU) and support WAP's Average Cost Per Unit (ACPU) requirements.

Reporting/Tracking

All households deferred from receiving weatherization services due to a weatherization barrier being present are tracked according to the process outlined in WPN 24-9. CT DEEP will utilize the deferral tracking tab on the CT WAP Monthly Reporting Template to track all jobs deferred from receiving weatherization services, including jobs that are remediated using WRF funding and those addressed using other non-WAP and non-WRF funds. Tracking will occur for each building and unit, and at a minimum, capture measures/repairs and associated costs, for reporting purposes.

Reporting Categories

Each Subgrantee is required to submit monthly reports to DEEP. Reports must include:

- Count and Descriptions of households assisted, including:
- referral source.
- summary of each completed job.
- categorized expenses of WRF-related activities completed by barrier type(s) and funding source.
- type of households assisted (i.e. single family or 2–4-unit buildings); and
- location of the home.
- Expenditure allocation of all program funds, including WRF, in the aggregate; and
- Status of each project (in pipeline, in-progress, or complete).

Subgrantees are required to use the DOE Deferral Tracker spreadsheet to document use of WRF funds to DEEP monthly.

Eligible Measures

WPN 24-9 dictates which measures are allowable utilizing the WRF funding. Connecticut will use WRF funds for measures included in WPN 22-7, as well as roof repairs and replacements. The measure list below is not exhaustive, and Connecticut may approve additional repairs outside of this list if the unit would otherwise be deferred from weatherization. All proposed measures must be accompanied by adequate justification and be aligned with WPN 24-9.

- Roof repair
- Wall repair (interior or exterior)
- Ceiling repair
- Floor repair
- Foundation or subspace repair
- Exterior drainage repairs (e.g., landscaping or gutters)
- Plumbing repairs
- Electrical repair

- Clean-up or remediation beyond typical scope of WAP
- Lead paint
- Asbestos (confirmed or suspected, including vermiculite)
- mold and/or moisture

Subgrantees must perform a H&S assessment to determine whether conditions can be addressed with H&S funds or whether the conditions in the unit would lead to a deferral and may be appropriate for WRF consideration. Charging the H&S assessment to WRF is not permissible.

Process

Each unit serviced by WAP is first screened for any necessary repairs (health and safety, structural issues, etc.) that may hinder weatherization activities. Identified issues are initially evaluated under standard WAP categories, including Health & Safety (H&S) and Incidental Repair Measures (IRM).

- Conditions that can be addressed with H&S or IRM funds and do not cause deferral are remedied using those sources.
- Conditions that cannot be reasonably addressed through H&S or IRM and would otherwise result in deferral may be eligible for WRF
- Weatherization work proceeds after WRF activities are completed in accordance with program requirements and WPN 24-9.

WRF funds may be spent in a WAP Program Year that is different from the Program Year in which WAP services are provided to the dwelling unit as long as both the WRF and WAP work are completed within the same DOE three-year grant period. However, DEEP prefers that work for any unit receiving WRF funding be initiated within 12 months of the WAP eligibility determination. This aligns with WAP requirements that eligibility remains valid for one year from the date the applicant was first determined income eligible.

Braiding Funds

Supplemental funding may be braided with WRF to support barrier remediation and reduce deferrals. All funding allocations must be transparent, reconcilable, and properly documented in the Client File.

Funding Restrictions

DEEP does not propose additional restrictions beyond those specified in WPN 24-9 and applicable DOE guidance.

Reporting/Tracking

All households deferred from receiving weatherization services due to a weatherization barrier being present are tracked according to the process outlined in WPN 24-9. CT DEEP will utilize the deferral tracking tab on the CT WAP Monthly Reporting Template to track all jobs deferred from receiving weatherization services, including jobs that are remediated using WRF funding and those addressed

using other non-WAP and non-WRF funds.

Tracking will occur for each building and unit, and at a minimum, capture measures/repairs and associated costs, for reporting purposes.

Reporting Categories

Each Subgrantee is required to submit monthly reports to DEEP. Reports must include:

1. Count and Descriptions of households assisted, including:
 - a. referral source.
 - b. summary of each completed job.
 - c. categorized expenses of WRF-related activities completed by barrier type(s) and funding source.
 - d. type of households assisted (i.e. single family or 2–4-unit buildings); and
 - e. location of the home.
2. Expenditure allocation of all program funds, including WRF, in the aggregate; and
3. Status of each project (in pipeline, in-progress, or complete).

Subgrantees are required to use the DOE Deferral Tracker spreadsheet to document use of WRF funds to DEEP monthly.

Monitoring

WRF activities will be monitored through state’s standard WAP oversight processes. This includes file review and field inspections to ensure:

- WRF funds are used in accordance with program requirements and WPN 24-9
- Repairs are appropriately tied to conditions that would otherwise result in deferral.

WRF-supported activities will also be monitored as part of the annual comprehensive monitoring of Subgrantees, ensuring the funds are expended in accordance with the Grantee’s WRF plan for the purposes approved by DOE, ultimately resulting in DOE completed units.

V.1.3 Definition of Children

Definition of children (below age): 6

V.1.4 Approach to Tribal Organizations

In accordance with 10 C.F.R. § 440.16(f), low--income members of an Indian tribe who apply for the program will receive benefits equivalent to the assistance provided to other low- income persons within Connecticut. DEEP has not made the recommendation provided in 10 CFR § 440.12(b)(5) that a tribal organization be treated as a local applicant eligible to apply pursuant to 10 CFR § 440.13(b). Connecticut law recognizes five Indian tribes: (1) Golden Hill Paugussett, (2) Mashantucket Pequot, (3) Mohegan, (4) Paucatuck Eastern Pequot and (5) Schaghticoke. 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. § 440.14(c)(6)(ii) to deliver services as Subgrantees (subcontractors or service providers). These entities have demonstrated experience and performance in weatherization or housing renovation activities, experience in helping low-income persons, and capacity to undertake a timely and effective weatherization program.

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

In Program Year 2026 (PY26), DEEP will work with those Subgrantee(s) which were competitively selected out of a Request for Proposals process that took place during PY23 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. Subgrantees are under contract for three program years contingent upon performance. Specifically, to ensure equitable geographic distribution, Connecticut will include target unit production goals by region in Subgrantee contracts. The WAP service territories have been consolidated into two regions, with region 1 containing Middlesex, Tolland, Litchfield, Windham, New London, and Hartford counties and Region 2 containing Fairfield and New Haven counties. County population size and poverty level were determined using several data sources such as the 2019 Connecticut total population estimate and census data. This information was then used to split the counties so that each region would contain approximately an equal number of income-eligible households.

Subgrantees implemented a Request for Proposals (RFP) for vendors in PY23. Pricing will be updated annually through a competitive pricing scheme.

DEEP will seek the input of the Policy Advisory Council (PAC) which is the Connecticut Low -Income Energy Water Advisory Board (LIEWAB) on PY26 program implementation strategies. LIEWAB is an independent body whose membership includes stakeholders such as Community Action Agencies, State Agencies, Nonprofits, and Quasi Public Organizations. These key stakeholders assess how to improve the delivery of services statewide in PY26. 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

Weatherization Clients determined eligible for the program through LIHEAP or other means tested application processes are served on a first come first serve basis. If a waitlist develops, then an eligible client is added to a waitlist to receive weatherization services. Once on a waitlist, priority is given to the

most vulnerable households, defined by DOE as being households with:

- High energy use (Defined in 10 CFR § 440.3)
- High energy burden (Defined in 10 CFR § 440.3)
- Elderly occupants (60 years of age or older)
- Disabled occupants
- Young child occupants (under age 6).

Once the most vulnerable clients have been served, priority is given to clients who have been on the waitlist the longest. All clients are required to reapply on an annual basis to ensure they are still eligible to receive services and no application on the wait list is older than one year. Subgrantees should keep a record of the first time the client applied for weatherization to ensure that a client does not lose their place on the waitlist when reapplying for weatherization services.

DSS provides to DEEP the list of households eligible for LIHEAP by region and provides each eligible household with a notice of eligibility for weatherization which contains information on how to apply for WAP. These regional lists are provided to the Subgrantees who then determine prioritization according to the prioritization criteria provided above.

DEEP will continue to refine the prioritization process to better facilitate cooperation with the utility partners and leverage non-DOE resources to best serve WAP households.

Definition of High Energy Burden Utilized in Connecticut

Consistent with Operation Fuel's definition of high energy burden in *Home Energy Affordability in Connecticut: The Affordability Gap*, DEEP 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 a High Energy Burden are tracked in the monthly reporting template provided to DEEP by each Subgrantee which is completed utilizing data from the Weatherization Assistant Web 10.x software. This data is then aggregated bi-annually and entered into PAGE for the semi-annual reports.

Definition of High Energy User Utilized in Connecticut

Connecticut will continue to work with our utility partners and the Connecticut Low-Income Energy Water Advisory Board (LIEWAB) to research and develop a definition of High Energy user that meets the DOE requirements. Service delivery priority will be provided to those sites. Households that are High Energy Users will be tracked in the monthly reporting template provided to DEEP by each Subgrantee which is completed utilizing data provided by the utility service providers. This will then be aggregated bi-annually and entered into the PAGE bi-annual report.

V.4 Climatic Conditions

Connecticut WAP has implemented the use of the Weatherization Assistant 10.06.002 audit tool. Climatic conditions from Weather Stations closest to the weatherized home site will be used for all site-

specific WAP analyses.

The IECC 2021 Climate Zone Map recognizes the entire state of Connecticut as within Zone 5. The Weatherization Assistant Web-based Audit tool utilizes Hartford, CT as the only weather file located within Connecticut. DEEP recognizes Hartford, CT as the city which best represents the average climate conditions within Connecticut at 5,737 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, unless the SIR is greater than or equal to one (1.0), then the measure shall be installed as an ECM.

Heating degree days were calculated with NOAA Climatic Data (<https://www.weather.gov/wrh/Climate?wfo=box>) for a period of twenty-nine (29) calendar years from 1991 through 2024.

Based on this information:

- The central part of the State averaged 5,737 heating degree days.
- The southeastern part of the state averaged 5,528 heating degree days.
- The northeast part of the State averaged 6,317 heating degree days.
- The northwest part of the state averaged 6,970 heating degree days.

Connecticut's average of 5,975 heating degree days justifies heating system repairs or replacement as a H&S measure. Cooling Degree Days are not used in PY26 analyses, but DEEP will continue to evaluate cooling system repairs and replacements in WAweb. The goal will be to develop a clear process and plan for including cooling system replacements in the PY26 program.

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 CT 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 follow DOE WPN 22-4 and the 2026 CT WAP Quality Work Plan, 2026 CT WAP Weatherization Field Guide, the 2026 CT WAP Operations Manual, and the current DOE approved WAP State Plan.

In PY25, DEEP overhauled the existing single-family CT WAP Operations Manual to reflect DOE changes to the WAP and accommodate servicing small multi-unit (2-4 units) and multifamily buildings across the State.

In accordance with WPN 22-4, DEEP will provide Subgrantees and/or contractors with technical requirements for fieldwork including, but not limited to field guide(s), building diagnostic and combustion safety procedures, audit/testing policy and procedures; installation of energy conservation measures (ECM), H&S, incidental repair measures (IRM), and Quality Control Final Inspections. DEEP routinely reviews this compliance aspect with the Subgrantee at the time of contract execution and obtains an authorized signature of receipt by the Subgrantee.

DEEP 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.

DEEP 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 the DOE 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 CT WAP Subgrantees and/or contractors must be consistent with CT WAP Field standards and latest DOE approved Weatherization Field Guide.

DEEP has provided electronic links on the CT WAP webpage to the 2026 CT WAP Quality Work Plan, 2026 Connecticut Weatherization Field Guide, the latest version of the CT WAP Operations Manual, and the PY26 DOE approved State Plan as part of the executed agreement between the Grantee and Subgrantee and the Subgrantee and direct hire contractors. All documents can be found at:

<https://portal.ct.gov/DEEP/Energy/Weatherization/Subgrantee-Documents-for-Connecticut-Weatherization-Assistance-Program>.

DEEP shall ensure that all activities will comply with the current Historic Preservation Programmatic Agreement and the current NEPA determination. Any activities pursued outside of the allowable activities of the PA or the National Environmental Policy Act (NEPA) Determination shall require additional review per the agreements. Both the Programmatic Agreement and NEPA Determinations shall be made available to CT WAP Subgrantees.

DEEP has produced work quality standards that continuously align with DOE WPN 22-4, 2026 CT WAP

Quality Work Plan, 2026 Weatherization Field Guide, and PY 26 State Plan.

Connecticut WAP Monitoring shall conduct an ongoing assessment of Subgrantee staff and contracted resources to ensure that all personnel engaged in installing measures are aware of and practicing work standards in compliance with DOE WPN 22-4, CT WAP Quality Work Plan, 2026 Weatherization Field Guide, CT WAP Operations Manual, and PY26 State Plan.

DEEP's monitoring shall ensure that 100% of weatherized homes reported as complete are inspected by the Subgrantees in compliance with DOE WPN 22-4, the CT WAP Quality Work Plan, 2026 Weatherization Field Guide, CT WAP Operations Manual, and PY26 State Plan.

CT WAP Subgrantee contracts for services with weatherization contractors must also include an acknowledgment of the receipt of communication of links to the 2026 Weatherization Field Guide, DOE Standard Weatherization Specifications, and Standards as outlined in DOE WPN 22-4 Section 2.

Additional Program Information

In PY26, CT DEEP will not establish spending limits for WAP funds as long as DOE requirements are met (i.e., budget caps, ACPUs, etc.).

Definitions of Allowable Repairs

Major Repairs are defined as 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

Incidental repairs are defined as repairs that are necessary to ensure the effective performance or preservation of weatherization installations, but not part of a standard installation. These repairs may include repairing window framing to allow caulking, patching drywall for insulation installation, addressing roof leaks, repairing unsafe electrical wiring, and removing knob-and-tube wiring specifically to facilitate the installation of attic and sidewall insulation. All incidental repairs must be performed in accordance with DOE WPN 19-5.

Minor Repairs are defined as repairs that may be considered Incidental Repair measures, equal to or less than \$750. These 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.

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: Additional details on this section are set forth in the latest version of the CT WAP Operations

Manual.

Example contract language used in all Subgrantee contracts:

“All work performed must be in compliance with the DOE and CTWAP guidance, the CTWAP Quality Work Plan requirements, 2026 CT WAP Weatherization Field Guide, and the current CTWAP State Plan, available on DEEP’s webpage.”

Field guide approval dates

Single-family (including: 2-4 units multifamily structures): 9/30/2025

Manufactured Housing: 9/30/2025

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-family

Audit Name: Other (specify)

On 9/30/2025, DEEP received DOE approval to continue to utilize the site-specific, Weatherization Assistant – Web Based (WAweb) National Energy Audit Tool (NEAT) software.

Approval Date: 09/30/2025

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

On 9/30/2026, DEEP received DOE approval to use the Weatherization Assistant – Web Based (WAweb) Mobile Home Energy Audit (MHEA) software.

Approval Date: 9/30/2025

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, Weatherization Readiness Fund, and General Heat Waste measures, only measures with an individual SIR of one or more are allowed. Health and Safety (H&S) Audits as detailed in the H&S Plan and Weatherization Readiness Fund Plan and CTWAP 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 and provide required materials and notifications, and appropriate contact information.

DEEP continues to regularly update the libraries utilized in WAweb prior to the start of the program year including the fuel pricing and measure costs. Connecticut WAP is currently working with Hancock Software Inc. to continue the deployment of a weatherization database management system.

Multifamily: For WAP Formula funds, multifamily refers to 2–4-unit structures. Any structures with 5 or more units will be weatherized using WAP IJJA funds.

V 5.3 Final Inspection

DEEP's mechanism for adjusting Quality Control Inspector (QCI) Final Inspection and QCI In-Process Monitoring rates is based on results and information captured within the CT WAP In-Progress Work Observation Form and the CT WAP Quality Control Inspection Form.

Connecticut WAP policy requires that Subgrantee Quality Control Inspections will be conducted on 100% of all completed units. Connecticut WAP policy requires that Grantee Quality Control Inspections will be conducted on at least 10% of all completed units. More units may be inspected if deficiencies are identified.

Connecticut WAP may consider In-Progress monitoring as recommended by DOE in WPN 24-4. Grantees are strongly encouraged to review in-progress units. While in-progress visits are not included in the percentage of completed units, it allows Grantees the opportunity to assess:

- Quality and compliance.
- Appropriate and allowable materials.
- Appropriate and accurate energy audits (no missed opportunities or unallowable measures).
- Comprehensive final inspections.
- Safe work practices, such as lead safe weatherization protocols and Occupational Safety and Health Administration (OSHA) compliance.
- Other factors that are relevant to onsite work.

Note: All Final QCIs conducted on work performed and reported as DOE completed CT WAP sites must be in compliance with 10 CFR § 440.21, DOE WPN 22-4, DOE WPN 24-4 section 2, the 2026 CT WAP Quality Work Plan, 2026 Weatherization Field Guide, and the current program year's State Plan.

Subgrantees 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 DEEP's approval. Failure of any person to achieve QCI Certification will result in a temporary suspension from additional "comprehensive" training opportunities.

Connecticut WAP has developed specific policies and tracking documents to address DOE prescribed QCI policy for administering quality control inspections. Please see attached Connecticut WAP Quality Control Inspection Report and the 2026 CT WAP Quality Work Plan.

An Independent QCI is an individual who has no direct involvement in 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 inspect at least 10% of all completed units.

An Auditor is the individual who performs the initial audit and creates the work order. They may also

perform the final QCI inspection, although it is preferred for these to be two separate individuals. The auditor cannot be involved in actual installation of measures at the site.

Note: When Subgrantees use the Auditor/QCI model, DEEP will require quality assurance monitoring on a minimum of 10% of all completed units. In addition, Connecticut WAP will conduct ongoing quality assurance monitoring to ensure that the individual serving as both the Auditor and the Inspector is able to effectively and consistently perform both tasks on a regular basis.

During PY26, DEEP anticipates an increasing volume of unit completions throughout the Program Year. DEEP will assess the need for additional auditors and/or QCIs to ensure complete program coverage. For additional information see the response to V.8.4 - Training and Technical Assistance Approach and Activities.

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.

Final evaluations will be used for the assessment of the effectiveness of Auditors, Quality Control 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% effectively. No action necessary.
- Level 2: Subgrantee and/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/ The Subgrantee or Subcontractor may be subject to increased monitoring and/ or inspections.
- Level 3: Subgrantee or Subcontractor has failed to address corrective actions and or deficiencies repeatedly. This can result 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 10 CFR § 440.14(c)(6)(i), DOE WPN 22-4 and the 2026 CT WAP Quality Work Plan, 2026 CT WAP Weatherization Field Guide, and the current year State Plan. 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 24-4 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 all reports from NEAT, MHEA, or other approved auditing tool(s) to ensure the list of recommended measures was followed and to ensure costs of individual measures are within the audit estimate;

The measures installed are tracked by Subgrantee and reported to DEEP. Average job costs are tracked to ensure that the Subgrantee is within State mandated limits. Jobs are tracked regionally to ensure adequate and fair coverage across the entire 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.

The Grantee also reviews Subgrantee procurement practices of both materials and subcontracting to assure costs are fair and relatively consistent across the state at the time of procurement as part of continuous monitoring.

The goal is to be a uniformly effective WAP throughout the entire state. Each client served, regardless of their 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 monitoring site visits will be used to determine Training and Technical Assistance (T&TA) needs (regular and comprehensive) at the Grantee 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 comprehensive monitoring activities, the technical, programmatic, and financial processes of the Subgrantees are observed to ensure that they align with CT WAP and DOE regulations and guidelines. Comprehensive monitoring includes programmatic monitoring which is a review of the Subgrantee's overall administration of CT WAP. Compliance is ensured by monitoring client files and completing site visits. Fiscal monitoring involves a review of the Subgrantee's fiscal operation and utilization of weatherization funds to ensure compliance with CT WAP and DOE regulations and guidelines. Technical monitoring is completed by DEEP's technical consultants and involves them visiting a certain percentage of in-progress and completed units. In addition to these processes, DEEP also works with its technical consultants to complete comprehensive desk monitoring. This process includes reviewing production reports, agency claims, and other Subgrantee documentation to ensure compliance.

The State is continuously 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 serves approximately 7,800 income eligible homes per year. CT DEEP and the utilities are continuously working to standardize requirements between the service delivery models. Additionally, DEEP is working on coordinating with our utility partners to analyze the realized energy savings of the installed weatherization measures more comprehensively.

A continuous improvement approach is used to monitor the Subgrantee(s). DEEP is committed to monitoring the effectiveness of the Subgrantee(s) to improve service delivery.

DOE adheres to the transparency requirements placed in these and other government financial assistance programs instituted by the administration. DOE will work diligently with any state WAP or local service provider to gather the required information and provide it to the requester. In compliance with 2 CFR § 200.338 retention requirements for records: “No federal awarding agency may place restrictions on a non-federal entity that limit public personally identifiable information (PII) or when the federal awarding agency can demonstrate that such records will be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 USC 552) or controlled unclassified information pursuant to Executive Order 13556 if the records had belonged to the federal awarding agency. The Freedom of Information Act 95 USC 552 (FOIA) does not apply to those records that remain under a non-federal entity’s control except as required under 2 CFR § 200.315. If the records had belonged to DOE. DOE would be legally required pursuant to 5 USC 552(b)(6), of the Freedom of Information Act, to keep confidential any specifically identifying information related to an individual’s eligibility application for WAP, or the individual’s participation in WAP, such as name, address, or income information.” Thus, CT DEEP and the local weatherization service providers will extend that same protection to their client records for WAP. States may release information about recipients in the aggregate which does not identify specific individuals such as the number of recipients in a county, city, or a zip code that does not compromise the privacy of recipients.

V.7 Health and Safety

Connecticut WAP has implemented policies and procedures to address health and safety considerations that are in compliance with 10 CFR § 440.16, 10 CFR § 440.18, 10 CFR § 440.21, WPN 22-7, and WPN 19-5. These are included in the 2026 CT WAP Health and Safety Plan, the latest version of the CT WAP Operations Manual, and 2026 CT WAP Quality Work Plan. DEEP tracks and budgets Health & Safety funds separate from Program Operations.

Please see the attached PY26 Grantee Health & Safety Plan found in the Section V.10 - Miscellaneous of this application for a comprehensive overview of Health and Safety as well as the latest version of the CT WAP Operations Manual, Health and Safety Forms, and Hazard Identification Forms found at <https://portal.ct.gov/DEEP/Energy/Weatherization/Subgrantee-Documents-for-Connecticut-Weatherization-Assistance-Program>.

V.8 Program Management

V.8.1 Overview and Organization

WAP administrative policies and procedures are set forth in the latest version of the CT WAP Operations Manual, which is regularly updated and publicly available online on DEEP's webpage.

The U.S. DOE Weatherization Assistance Program is administered by the Grantee, Connecticut Department of Energy and Environmental Protection (DEEP or CT DEEP). The Connecticut's Weatherization Assistance Program (CT WAP) is administered by the Bureau of Energy and Technology Policy (BETP) and is overseen by the Deputy Commissioner and Bureau Chief. BETP's Bureau Chief oversees the operations of the BETP staff and Subgrantees delivering the CT WAP.

DEEP also has oversight of the ratepayer-funded utility program Home Energy Solutions – Income Eligible (HES-IE). This energy program serves the same low-income population as WAP in Connecticut and currently cost shares many measures reported on DOE WAP units. The program administrators of WAP and HES-IE have collaborated to align these two programs to more effectively serve the low-income population of Connecticut. The goal of aligning these two programs was to offer low-income residents a more comprehensive list of both health and safety and energy saving measures.

DEEP does not administer the Connecticut Energy Assistance Program (CEAP). CT's Department of Social Services (DSS) is responsible for administering CEAP. 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. Housing and Urban Development (HUD) and other housing programs are administered through the Connecticut Department of Housing.

V.8.2 Administrative Expenditure Limits

Not more than 15 percent of any grant made to a State may be used by the Grantee and Subgrantees for administrative purposes in carrying out duties. 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. In its annual plan, a State may provide up to an additional 5 percent for administrative costs to recipients of grants of less than \$350,000. To do so, the State must determine that such recipient requires additional funding to effectively implement the administrative requirements established by DOE pursuant to 10 C.F.R. § 440.18 (e) and 10 CFR § 440.18(d).

For PY26, CT WAP plans to distribute the administrative allocation as follows:

- DEEP – 2.5%
- Subgrantee(s) – 12.5%

In future program years, DEEP may revert to the historical allocation of 5% to DEEP and 10% to

Subgrantees.

V.8.3 Monitoring Activities

Connecticut's monitoring approach will include an administrative review of documents and reports related to the organization, operation, and performance of service delivery. DEEP will also conduct technical monitoring to ensure compliance with standards, performance measures, applicable codes, and other policies related to the installation of materials. Annually, DEEP will also conduct a Fiscal Audit for financial stability and accountability.

Note: All Monitoring activities will be conducted in compliance with DOE Guidance WPN 22-4, WPN 24-4, the Connecticut Weatherization Assistance Program Quality Work Plan (2025) requirements, 2026 CT WAP Field Guide, and the current year State Plan. Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

DEEP recognizes DOE's Guidance and references the following CT WAP documents regarding specific monitoring activities:

- The latest version of the CT WAP Operations Manual
- The 2026 CT WAP Field Guide
- WPN 22-4: Subgrantee Monitoring – Attachment 1 “Updated Checklists and Operations Manual”

Note: During the current program year, DEEP may continue to adjust monitoring activities commensurate with the quality of work and the progress demonstrated by the Subgrantees. Subgrantee monitoring will comply with WPNs 22-4, WPN 24-4, and all other applicable DOE Guidance. DEEP will perform comprehensive monitoring of Subgrantees on an annual basis. Records reviews at the Subgrantees' offices may involve multiple visits and may be focused on regions of the state, resulting in separate annual monitoring events according to region.

In alignment with WPN 24-4, more frequent monitoring of Subgrantees that have been identified as having significant deficiencies will be conducted. The individual monitoring activities are structured as follows:

- Annual Programmatic Monitoring (APM) and Annual Fiscal Monitoring (AFM) based on the current Program Year's allocation.
- Technical Field Monitoring (TFM) of at least 10% of all completed units.
- Comprehensive Desk Monitoring (CDM), which consists of a file review of at least 10% of all completed units.

Note: While this exceeds DOE minimum standards, the recent audit tool implementation and QWP-25 standards compliance warrant additional activities to ensure the best outcomes. Actual Program Year totals may be adjusted to DOE minimum levels if mid-year assessments indicate consistent acceptable

performance at any Subgrantee.

DEEP will utilize contracted Technical Advisory services via a T&TA Subgrantee to conduct quality control inspections of at least 10% of all completed units. As part of our contract(s) with the Subgrantee(s) and as a part of our annual monitoring visit(s), DEEP can require the Subgrantee to submit their most recent 2 CFR 200 Financial Audit. These financial audits will be reviewed and approved by DEEP's Business Office. DEEP will continue to contract technical monitoring services with T&TA funds to complete all state level QCIs, field monitoring, and desk monitoring services. The provider(s) of these services will continue to provide monitoring and support services under the direction of WAP program administrators. DEEP anticipates that Subgrantees will utilize components of the DOE prescribed standard options to conduct QCIs as defined in WPN 22-4.

The Grantee developed QCI process allows for greater effectiveness in conducting all QCI and monitoring activities. Each Quality Control Inspection Form must document the following:

- The QCI's name, BPI number, and the expiration date of the QCI's BPI certification.
- Information about the home and client served.
- Confirmation that all programmatic documents are complete and included in the client file.
- Confirmation that all work listed on the work order was completed in compliance with program standards.
- Testing results and a pass or fail determination, if applicable.
- A final determination whether the unit has passed or failed the inspection.

Each 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) Contracted entities who serve as Quality Control Inspector/Technical Monitoring Compliance Consultant/Technical Support
- Full time
- Compensation: 100% Grantee T&TA (To include POV Travel & Expenses)

Weatherization State Team Members and their responsibilities for monitoring

Position	Associate 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	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	Programmatic Performance and Compliance
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

Position	Grants and Contract Specialist
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 the following instruments prepared specifically for use in Connecticut:

- CT Subgrantee Programmatic Monitoring Tool
- CT Subgrantee Fiscal Monitoring Tool
- CT File Review Form 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 all regions being reviewed for a complete statewide review.

All deficiencies, related findings, and corrective actions are reported to each Subgrantee's Executive Director, Program Director, and Chief Financial Officer with specific direction for corrective actions, response times, terms and conditions, and consequences in the event of failed compliance. DEEP reserves the right to disallow any costs associated with any discrepancies identified during any Technical or Fiscal monitoring activity.

Subgrantees are subject to removal from the program and will be defunded all remaining allocations if they 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.
- Inadequate fiscal and/or management policies, procedures, enforcement, or controls.
- Failure to improve current management systems within State mandated 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 aims to optimize the number of onsite visits needed statewide.

Additional monitoring will be conducted if the Subgrantee(s) is/are found to have difficulties in management, 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.

DEEP routinely and systematically reviews monthly reports and conducts desk reviews of Building Weatherization Reporting to identify any potential monitoring needs. The contracted Technical Monitoring Compliance Consultant(s) may also review these reports to aid DEEP in identifying specific training and/or monitoring needs.

The contracted Technical Monitoring Compliance Consultant(s) select(s) 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. DEEP utilizes the following forms for all Technical Monitoring activities:

- CT WAP Initial Audit Observation Form
- CT WAP In-Progress Work Observation Form
- CT WAP Quality Control Inspection Form
- CT WAP Client File Requirements List
- DOE WPN 22-4

Note: All Technical Compliance Monitoring will be conducted in compliance with DOE WPN 22-4 and the CT WAP Quality Work Plan (2025) requirements, 2026 CT WAP Weatherization Field Guide, and the current year State Plan and US DOE WPN 22-7 Health and Safety Guidance.

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

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.

Written monitoring reports delivered to the Subgrantee(s) will contain specific details for corrective actions and response times not to exceed 30 days of receipt of notifications. Any response directed to the Subgrantee(s) 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 invoices until resolved to the satisfaction of DEEP management. Furthermore, 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 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;
- Inadequate fiscal and or Management policy, procedures, enforcement, and controls.

Significant findings such as waste, fraud, or abuse will be reported to DOE immediately.

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

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 ensure that corrective actions are effective and continuous.

V.8.4 Training and Technical Assistance Approach and Activities

DOE allocates T&TA funding to the states to support state WAP implementations 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, DOE consulted with Weatherization Professionals to identify and develop 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 was to increase the levels of competencies and expertise in the workforce so that every house that is weatherized receives appropriate and 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 of WAP. However, just because a heating, ventilation, and air conditioning (HVAC) contractor is licensed by the state does not mean they possess the competencies required. Additional training for these contractors may be required or someone at the local agency must be competent in specifying what work the contractor must complete and to verify that the completed work complies with WAP's technical standards.

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 (Required)

The Connecticut Weatherization Assistance Program (CT WAP) is committed to increasing the WAP network's expertise. Numerous program training opportunities and hands-on workshops have been conducted with the goal of maximizing 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 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. In PY23 and PY24, DEEP received feedback from DOE through technical and programmatic monitoring and from the State Monitors based on desk reviews and field inspections completed in PY 25 regarding the T&TA needs of the CT WAP network and has incorporated recommended trainings and technical support within the PY26 proposed T&TA plan (see Attachment “Training & Reporting Template” of the T&TA Plan).

Quality Control Inspection personnel must complete DOE-approved Comprehensive Training and possess the knowledge, skills, and abilities listed in the National Renewable Energy Laboratories Job Task Analysis and become certified by the Building Performance Institute (BPI) as a Home Energy Professional Quality Control Inspector. Supervision must be provided to all personnel who do not possess the proper certifications by an individual who currently holds the necessary certifications.

DEEP 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.

DEEP will provide all comprehensive training through an IREC accredited service provider per DOE guidance. DEEP will strive to ensure that each Subgrantee will have a minimum of two Energy Auditors and two Quality Control Inspectors to weatherize the expected number of units each program year.

V.9 Energy Crisis and Disaster Plan

Energy Crisis

DEEP utilizes the DOE definition of an energy crisis which is defined as “an emergency resulting from an energy supply crisis, economic impacts, widespread energy distribution interruption, or energy infrastructure damage. It includes all actions taken to ensure the balance generation and load to ensure reliability of the electric interconnection”.

Disaster Plan

Connecticut has developed a State Response Framework (SFR) that outlines the roles and interactions of the State government with Federal, Local, Tribal, Non-Governmental, and Private Entities as well as the media and 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 require statewide action. The current framework does not identify WAP as a resource for disaster response.

For weatherization purposes, a disaster is determined by a Presidential or Gubernatorial order declaring a Federal or State Emergency. The disaster may be caused by natural or man-made hazards and generally involves at least three phases: the crisis itself, the clean-up, and the rebuilding of the affected area.

In the event of a Federal or State-declared disaster, Subgrantees may continue to use DOE WAP funds to

support typical weatherization activities. The Subgrantee can prioritize households that are in the Federal or state-declared disaster area as long as they meet one of the previously established prioritization criteria for the Program and as long as the household is free and clear of any insurance claims or other forms of compensation resulting from the disaster.

Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOR investment. Such activities include securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records, and the like during the initial phase of the disaster response. However, using DOE funds to pay for weatherization personnel to perform relief work in the community because of a disaster is not allowable.

Please note that the following programmatic requirements still apply during emergencies:

- ACPU limit(s)
- Allowable uses for WRF, as outlined in the Grantee Plan
- Requirements around incidental repairs (See 10 CFR 440.14(c)(6)(viii) for more details)
- Use of agency weatherization vehicles and/or equipment.
- Priority assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16(b)).

Allowable measures are limited to those contained within:

- 10 CFR 440
- DOE WPN 22-7
- DOE WPN 25-1

All Costs are to follow the rules applied to WAP as stated in the following:

- 10 CFR 200
- CT WAP Operations Manual
- Generally Accepted Accounting Principles (GAAP)

Special Circumstances (Acts of God)

When a previously weatherized dwelling is damaged by fire, flood, or other disaster (e.g., tornado, earthquake, lightning, or other natural disaster), the unit may be re-weatherized if the owner has insufficient or no insurance to cover the damage. Assistance will only be provided to pay for damage not covered by insurance. Only those materials and labor costs considered allowable under WAP guidelines will be allowed.

Note: Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

V.10 Dispute Resolution Process

Please see the CT WAP Dispute Resolution Process which will be included in the application and is available on our website.

Note: Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

V.11 Investigating Allegations of Fraud, Waste and Abuse

Please see the CT WAP Plan for Investigating Waste, Fraud, and Abuse which will be included in this application and is available on our website.

Note: Additional details on this section are set forth in the latest version of the CT WAP Operations Manual.

V.12 Miscellaneous Section

Additional Information

Additional guidance, policies, and procedures are set forth in the latest CT WAP Operations Manual, as may be amended by DEEP, for Subgrantee use.

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Public Advisory Committee (PAC)

CT WAP's Public Advisory Committee (PAC) is the Low-Income Energy Water Advisory Board (LIEWAB). This board meets on the first Wednesday of alternating months.

The Notice of Public Hearing and Notice of Opportunity for Written Comments (Notice) for the CT WAP public hearings provides the public with detailed information including the date, time, and location of the hearings regarding the CT WAP State Plan. The Notice also makes clear that these hearings are an opportunity to provide verbal or written comments on the State Plan. Information regarding where to access and review the State Plan is also included in this Notice. The Notice itself is distributed to the public via multiple avenues. It is posted on the CT WAP webpage, the Secretary of State's public agency

calendar, and on DEEP's Energy Filings website. In addition to this, the Notice was sent out via email to the LIEWAB distribution list. LIEWAB is CT WAP's designated PAC, so many key WAP stakeholders are members of this distribution list.

The State of Connecticut established the Low-Income Energy Water Advisory Board (LIEWAB), in accordance with Connecticut General Statutes Sec. 16a-41b. The purpose of LIEWAB is to assist the Office of Policy and Management (OPM) and the Department of Social Services (DSS) in the planning, development, implementation, and coordination of energy-assistance-related programs and policies such as the Low-Income Home Energy Assistance Program. The Board advises the Department of Energy and Environmental Protection (DEEP) regarding the impact of utility rates and policies and the Low-Income Weatherization Assistance Program.

Additional Energy Efficiency Measures

In PY26, DEEP may ask DOE for approval to perform fuel switching and to install additional energy efficiency measures beyond what is currently listed in Appendix A to Part 440, Title 10 in accordance with program guidelines. Converting heating systems to all-electric heat pumps can improve the energy efficiency of a home's HVAC system. However, due to different prices for different energy sources a home's heating and/or cooling bills may or may not be reduced with a conversion to a heat pump. Therefore, DEEP commits to working with DOE and the WAP Subgrantees to determine WAP program rules that will ensure conversions to heat pumps are only recommended when bill reductions are reasonably assured. DEEP will follow the submittal requirements for fuel switching approval detailed in WPN 23-6 Attachment 5 and for alternative measure approval detailed in WPN 23-6 Attachment 6. To attain fuel switching approval, DEEP will pursue the second option laid out in WPN 23-6 Attachment 5 as a policy administered by the Grantee. DEEP will work with the selected subgrantees of the formula and IJJA allocations to determine how best to incorporate fuel switching into the programs and to submit the required submission documents to DOE. DEEP will ensure that utility bill impacts are evaluated prior to recommending fuel switching to a program participant.

In PY26, DEEP may work with the Subgrantees to explore incorporating solar PV, as allowed by WPN 23-6, into the formula program. DEEP will use the information gathered during this exploration process to determine if applying for approval from DOE to incorporate solar into the program is appropriate in future program years.