

Program Year 2025 – Annual Weatherization Assistance Program (WAP) Application (Master File)

Connecticut Department of Energy & Environmental Protection (DEEP)

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Income refers to cash receipts earned and/or received by the applicant before taxes are deducted. Income does not include the exclusions identified in the U.S. Department of Energy (DOE) Weatherization Assistance Program (WAP) guidance, WPN 24-3. Gross income, not net income, should be used to determine eligibility.

All households that 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.

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:

- Whose income is at or below 200% of the poverty level, as determined in accordance with the 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 their income is at or below 200% of the poverty level, as determined in accordance with criteria established by the Director of the Office of Management and Budget.

Connecticut WAP (CT WAP) also considers a household eligible for WAP if it is determined eligible for assistance under the Low-Income Home Energy Assistance Program (LIHEAP) as outlined in 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), it 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.*

Furthermore, eligibility for weatherization assistance is also extended to:

Anyone 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 eligible for assistance under a USDA means-tested program is categorically eligible per the guidelines set forth in WPN 25-4

Anyone 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 Options A, B, or C of the 2024-2025 HES-IE application, and 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 HES-IE application [on energizect.com \(2024-2025 HES-IE Application \(English\)\)](https://energizect.com/2024-2025-HES-IE-Application-English).*

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 weatherized units have eligibility documentation

No dwelling unit may be weatherized without documentation of eligibility. At the Subgrantee level, all household income must be calculated per DOE requirements. 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 § 203.6, Proof of Ownership, CT WAP Operations Manual.

If the WAP applicant is a renter, the Subgrantee is required to verify the applicant's income and tenancy as part of the WAP eligibility process. Prior to beginning weatherization work, the applicant must prove their tenancy via documentation. The preferable documentation to prove tenancy is a lease, rent receipt or a written statement. Such documents must include the applicant's name; the address of the unit to be weatherized; and the name, date and signature of the owner, landlord or other authorized representative. See §203.7, Proof of Tenancy in the CT WAP Operations Manual.

All households that 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 CT WAP. 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 verify eligibility for CEAP include income documentation (i.e., W-2 forms), liquid asset documentation (i.e., checking and savings accounts, stocks, bonds, and retirement accounts), 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 CT WAP staff to confirm eligibility. See § 201.3, 202, 202.2, 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 on low-income households caused by applying and submitting the same income verification documentation to multiple federal programs. CT WAP regularly provides a list of HUD means-tested properties that are categorically eligible to receive weatherization services to the WAP Subgrantees. In PY25, DEEP will continue working with our technical consultants to streamline this process so that the Subgrantees can serve all categorically eligible households.

This past year, CT WAP coordinated with the administrators of the utility-managed energy efficiency programs to align the eligibility requirements so that a household eligible for LIHEAP is automatically deemed eligible for both WAP and the HES-IE program.

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

Agreement is valid through December 2030.

Note: For further reference, please see CT WAP Operations Manual 2022, Sections 201, 202, and 203.

Describe re-weatherization compliance.

Since many households have never received weatherization services, the state policy documented in the CT WAP Operations Manual prioritizes such homes 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 eligible units for re-weatherization will receive a new energy audit.

CT WAP maintains a database of all homes that were weatherized under DOE WAP, LIHEAP, HUD, and USDA fifteen or less years ago. Subgrantees are provided with full access to this information for lookback purposes via our Hancock Weatherization Database, which is updated annually at the completion of a program year. The Grantee limits and monitors the number of such dwellings that each Subgrantee may re-weatherize.

Note: For further reference, please see CT WAP Operations Manual 2022, Section 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 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 that are renting must be ranked and verified in the same manner as those from households that own the property on which they reside. If the owner/landlord can contribute to the cost of weatherizing a rental property the Subgrantee should attempt to get a landlord contribution. If the owner/landlord is at an income level where they would also be eligible for weatherization assistance then an attempt to collect a contribution is not required. For more information, see Sections 112.4 and 112.4.1 of the CT WAP Operations Manual. i 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 Programming Officers (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: 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

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, CT WAP has developed processes and procedures to ensure that:

- Benefits of the services primarily accrue to low-income tenants residing in such units;
- For two years 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;
- The following language is added to each tenant's agreement to protect them from unjust rent increases due to the completed weatherization work ... added to the lease agreement
 - Weatherization Lease Clause: "The property owner agrees not to raise the rent of a unit because of the increased value of the unit due solely to weatherization improvements provided by the Weatherization Assistance Program. Allowable factors for rent increase include, but are not limited to, an increase in property taxes, operation, and maintenance costs, and/or amortizing costs of property improvements other than those funded by the Weatherization Assistance Program."
- Adequate procedures are in place whereby the Grantee and/or Subgrantee can receive tenant complaints should rent increase and owners can appeal;
- 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

In PY25, DEEP will work to update the rental agreement so that the owner or an authorized agent signs off on the scope of work before weatherization work begins. All rental properties will be serviced in accordance with the policies and processes outlined in WPN 22-13.

Please see the Weatherization Agreement for additional information on how CT WAP will comply with protecting the federal investment and address issues of eviction from and sale of property.

Weatherization Agreement

Landlords shall affirm by signing the 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, unless the increase is proved to be not tied to the weatherization work being done. In accordance with 10 C.F.R. §440.22(c), Connecticut may seek an agreement from the

landlord to placement of a lien against the landlord's property in the event the landlord does not comply with the rent increase or other prohibitions.

The Weatherization Agreement specifies conditions regarding evictions and/or rent increases because of the weatherization work that is done. If a complaint is filed, the Subgrantee will have the property owner/landlord verify that such actions are justifiable.

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

- Requirement of financial participation, when feasible, from owners of multifamily buildings.
- 2- and 4- unit buildings are considered eligible if at least 50% of units for duplexes and 4-unit buildings are income eligible. In 3-unit buildings 66% or more of the units must be income eligible

CT WAP will work with our Subgrantees to ramp up small multifamily (2-4 unit) building service over multiple PYs. CT WAP will determine a reasonable ramp up rate through conversations with the Subgrantees. In PY25, CT WAP has a goal of serving 22 small multifamily units. Formula funds will not be used to weatherize buildings with more than 4 units. Infrastructure Investment and Jobs Act (I), previously referred to as the Bipartisan Infrastructure Law (BIL) "PY23", posted on the DEEP Weatherization Website.

(<https://portal.ct.gov/-/media/DEEP/energy/weatherization/WAP-BIL-State-Plan/FINAL-WAP-BIL-Master-File.pdf>).

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

Describe the Notice of Postponement Process

When conditions warrant, it may be necessary to defer work in a dwelling, postponing it 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 are 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 Subgrantee 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 postponement are addressed within twelve (12) months of receipt. Should remediation take longer than that, eligibility must be reverified in accordance with State and Federal policy. Reverification is good for twelve (12) months. The Subgrantees are responsible for ensuring that the unit is weatherized within the twelve (12) month window. Connecticut WAP has implemented the DOE Deferral Tracking Tool to assist with postponement 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.

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- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent, and the conditions cannot be resolved cost-effectively;
- The building has sewage or other sanitary problems that may endanger client and/or 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.
- The presence of excessive storage in the unit 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 from being completed.

If at any point after an applicant has been selected from the postponement list and is subsequently denied services, Subgrantees must provide either the Notice of Postponement if the client is being deferred, or a written notice of denial of services. The denial notice must clearly state:

- The reason for the denial.
- A citation of all applicable policy manual sections and/or federal regulations on which the decision is based.
- That the applicant has a right to appeal the decision.
- That the applicant has fifteen (15) business days from the date of the notice to appeal; and,
- The procedure for sending an appeal to Subgrantees.

Appeals received after the fifteen-day period should be returned with a notice stating that it will not be considered as it was submitted beyond the deadline.

Subgrantees may use their own official procedure for hearing and appeals decisions. Appealed decisions are to be decided by a Subgrantee staff person, at least one level higher than the person who made the decision on the case eligibility. That person's decision should be communicated to the appellant in writing, no later than ten (10) business days following the receipt of the appeal. If the

Subgrantee fails to meet this deadline, the appeal must be automatically forwarded by the Subgrantee to DEEP for action. The appeal decision notice must clearly state the acceptance or denial of the appeal. If accepted, the weatherization process continues where it was left off.

If the appeal is denied, the notice must state:

- That the appeal has been reviewed and denied.
- That the appellant has a right to a final appeal to DEEP.
- That the appellant has an additional ten (10) business days from the date of the second letter to appeal to DEEP; and,
- The procedure for further appeal to DEEP. See Section 205.3 of the CT WAP Operations Manual for more details.

Procedure for Further Appeal

When the appeal is received at DEEP, DEEP will review the case. DEEP may request case file materials and speak personally to Subgrantee staff and the appellant. The appellant and Subgrantees will be notified of DEEP's decision within ten (10) business days of its receipt of the appeal. After DEEP's decision is issued, no other administrative appeal steps will be available to the denied applicant. Nothing in this process is to be construed as limiting an applicant's right to seek additional legal and judicial remedy.

If issues listed in the Notice of Postponement are resolved, the project is returned to the queue in the order in which it was initially received and is subject to verification of current eligibility requirements.

Note: For further reference please see CT WAP Operations Manual 2022 Section(s) 204, 204.1, 204.2, 204.3, 424.1, 205, 205.1, 205.2, 205.3, 308.5, 312.4, 313.1, 400, 401, 406, 406.3, 407, 408.2, 408.3, 410.1, 411, 412, 414, 416, 417.1, 417.2, 417.3, 417.4, 417.6, 417.9, 418, 419, 420, 421, 424, 424.1, 425, CT WAP Guidance #3, , and CT WAP PY25 Health and Safety Template.

Weatherization Readiness Funds

Weatherization Readiness Funds (WRF) are designated for use by Grantees to address necessary repairs (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). The following plan is utilized in the state of Connecticut to expend the Weatherization Readiness Funding.

Distribution of Weatherization Readiness Funds:

The State of Connecticut has been allocated \$383,625 for PY 5 and will allocate the funding in the following manner, to only be used on 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 Cost Per Unit:

The Maximum Cost Per Unit spent to address necessary repairs (health and safety, structural issues, etc.) that may be barriers will be set at \$31,400.

Prioritization of Dwellings:

WRF prioritization will follow the prioritization criteria used by the WAP program. In addition, WAP will prioritize customers with barriers that do not exceed the WRF Maximum Cost Per Unit (MCPU) and with energy projects that will allow WAP to adhere to its required Average Cost Per Unit (ACPU).

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 23-4. CT DEEP will utilize the DOE recommended deferral tracker to track all jobs that are deferred or denied from receiving weatherization services. This includes jobs that are fully denied, deferred to other relevant CT building remediation, and jobs that are deferred from weatherization, but will be remediated using Weatherization Readiness Funds before they receive WAP services.

Reporting Categories:

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

1. Count and descriptions of households assisted, including:
 - b. referral source;
 - c. summary of each completed job;
 - d. categorized expenses that include health and safety measure(s) completed by barrier type(s) and funding source;
 - e. type of households assisted (i.e., single family or 2-4 unit buildings); and
 - f. 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 electronically report on the deferred and denied units on a monthly basis.

Eligible Measures:

WPN 23-4 outlines the allowable measures using WRF funding. Additionally, Connecticut will use

WRF funds for measures included in WPN 22-7, as well as for 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 measures must be aligned with WPN 23-4.

- 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

The health & safety assessment completed by Subgrantees to determine WRF needs or to refer a WAP job to Connecticut's other relevant remediation programs will use Program Operation funds, not WRF funding.

Process:

Each one-to-four-unit household serviced by WAP is first screened for any necessary repairs (health and safety, structural issues, etc.) that may be barriers to weatherization activities. If a barrier to weatherization is found by the weatherization Energy Auditor, the household is evaluated utilizing the DOE approved health and safety audit. Once the unit is evaluated, a scope of work is developed based on the weatherization barriers present. Once the barriers are addressed, the Energy Auditor returns to the home to verify that all barriers have been remediated and to complete the energy assessment. All work within a unit using WRF is expected to be completed within a rolling twelve (12) months to align with the expiration of their WAP eligibility notice.

Braiding Funds:

The Subgrantees will only utilize Weatherization Readiness Funds to address health and safety barriers to the weatherization of income-eligible households.

Monitoring:

The proper use of WRF funding is monitored in three ways. First, an inspection of all work completed as part of a unit's remediation is conducted by the Energy Auditor who initially halted the energy assessment due to an identified barrier. Once that inspection is completed and the barrier has been deemed fully remediated, the household is then served by CT WAP. A final inspection will be

completed by the service provider QCI on 100% of units completed. 10% of those units will receive a final QCI from the state's independent QCI. All Activities conducted utilizing WRF are reviewed as part of Grantee's annual monitoring of Subgrantee activities.

Funding Restrictions:

CT WAP does not propose putting any restrictions on the use of WRF funds outside of the defined allowable scope described in WPN 23-4. Funds for remediation measures will be used exclusively to remediate barriers that prevent the installation of weatherization measures identified in the comprehensive Health & Safety audit.

V.1.3 Definition of Children

Definition of children (at or below age): 5

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. CT WAP 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) 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. § 440.14(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 the 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 2025 (PY25), 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 (1-4 unit) 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 PY25 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 PY25. 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. Waitlist service priority is given to the most vulnerable clients, including households with a member who is elderly (60 years and older), disabled, or at or below the age five (5). Priority consideration is also given to households with high energy use and High Energy Burden as defined in 10 CFR § 440.3.

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 provided prioritization criteria.

CT WAP 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*, 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 a 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 10.x. This data is then aggregated and submitted to DOE via quarterly program reports (QPR).

Definition of High Energy User Utilized in Connecticut

Connecticut will continue to work with our utility partners and the Connecticut Low-Income Energy and 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 CT WAP by each Subgrantee which is completed utilizing data provided by the utility service providers. This will then be aggregated quarterly and submitted to DOE via a QPR.

V.4 Climatic Conditions

Connecticut WAP has implemented the use of the WAwab 10.x 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 within Zone 5.

The Weatherization Assistant 10.06.002 Audit tool utilizes Hartford, CT as the only weather file located within Connecticut. CT WAP recognizes Hartford, CT, as the city that best represents the average climate conditions within Connecticut at 5,894 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 savings-to-investment ratio (SIR) is greater than or equal to one (1.0), then the measure shall be installed as an energy conservation measures (ECM).

Heating degree days were calculated using NOAA Climatic Data (<https://www.weather.gov/wrh/climate>) for a period of twenty-nine (29) calendar years from 1991 through 2020.

Based on this information:

- The central part of the State averaged 5,995 heating degree days.
- The southeastern part of the state averaged 5,249 heating degree days.
- The northeast part of the State averaged 6,068 heating degree days.
- The northwest part of the state averaged 6,422 heating degree days.
- The southcentral part of the state averaged 5,732 heating degree days.

Connecticut's average of 5,894 heating degree days justifies heating system repairs or replacement as a H&S measure. Cooling Degree Days are not used in PY25 analyses, but CT WAP will work to develop a plan to address the replacement of cooling systems in collaboration with DOE starting in August 2025. The goal will be to develop a clear process and plan for including cooling system replacements in the PY25 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 CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide Standard Work Specifications (SWS) Aligned Edition Version, The CT WAP Operations Manual and the current Year State Plan/Master File.*

In PY24, DEEP began to overhaul the existing single-family CT WAP Operations Manual to reflect the increase in the scale of operations to accommodate servicing small multi-family (2-4 units) buildings across the State. DEEP will complete this update in PY25.

In accordance with WPN 22-4, CT 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, incidental repair measures (IRM), and Final Inspections.

Connecticut WAP routinely reviews this compliance aspect with the Subgrantee at the time of contract execution and ensures that all technical updates are provided electronically in writing to each Subgrantee

Connecticut WAP routinely reviews this compliance aspect within the content of the Subgrantee's direct hire and vendor agreements and requires the Subgrantees to provide all direct hires and vendors with electronic updates as soon as they are received from the Grantee.

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 contain 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 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, the CT WAP Operations Manual, 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 specified in the PA or the National Environmental Policy Act (NEPA) Determination shall require the submission of an Environmental Questionnaire (EQ1) to DOE for review. Both the PA and NEPA Determinations shall be made available to CT WAP Subgrantees.

Connecticut WAP has produced currently has work quality standards that align with DOE WPN 22-4, the CT WAP Quality Work Plan, CT Weatherization Field Guide SWS Aligned Edition, and the current year State Plan/Master File. CT DEEP continuously updates these standards to be in alignment with the latest DOE guidance.

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 and practicing work standards in compliance with DOE WPN 22-4, the Connecticut WAP Quality Work Plan, the Connecticut Weatherization Field Guide SWS Aligned Edition, the CT WAP Operations Manual, and the current program year's State Plan/Master File.

CT WAP Monitoring shall ensure that 100% of weatherized homes reported as complete are inspected by the Subgrantees in compliance with DOE WPN 22-4, the Connecticut WAP Quality Work Plan, the Connecticut WAP Weatherization Field Guide SWS Aligned Edition, the CT WAP Operations Manual, and the current year State Plan/Master File.

Connecticut WAP will ensure that Subgrantee contracts with weatherization contractors include a section that requires them to acknowledge the receipt of communications regarding the CT WAP Field Guide, SWSs, and WAP standards, as outlined in DOE WPN 22-4.

Additional Program Information

For PY25, spending limits have been established as follows per household:

- 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 \$2,500 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 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 are defined as repairs necessary for the effective performance or preservation of weatherization installations, and 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 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: See WAP Operations Manual Section 311 and Section 702.

Example of 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 approval dates

Single-family (1-4 unit): 8/13/2021

Manufactured Housing: 8/13/2021

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 to utilize WAweb 10.x (NEAT) Approval Date: 8/27/2020

In February of 2025, CT DEEP submitted its Energy Audit tool reauthorization application. In this application, DEEP applied to use Weatherization Assistant Web (WAWEB or NEAT version 10.x).

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

CT WAP is DOE conditionally -approved (8/27/2020) to use the MHEA audit tool software to respond to manufactured home service requests on a case-by-case basis.

In February of 2025, CT DEEP submitted its Energy Audit tool reauthorization application. In this application, DEEP applied to use Manufactured Home Energy Audit (MHEA) tool.

Audit Procedure: Small Multifamily (2-4-units)

Audit Name: Other (specify)

CT WAP is approved to utilize WAweb (NEAT) to address 2-4-unit multifamily properties

Approval Date: PY 2024

Comments

Site-specific NEAT energy audits shall be performed for all jobs. After dwellings are thoroughly checked for all needed measures, the audit prioritizes the recommended measures by SIR. Except for Health and Safety (and general heat waste) measures, only measures with an individual SIR of one or more are allowed. Health and Safety (H&S) checks, detailed in the H&S Plan and client education, are also an important part of the energy audit process. Subgrantees providing weatherization services review, discuss and explain audit results with the client, provide collateral materials, and appropriate contact information.

State-level experts continue to closely monitor the NEAT audit tool proficiency of all Subgrantees. SWS aligned QWP-24 Setup libraries will be distributed before July 1, 2025. Updated fuel prices were collected and submitted as part of the audit tool application which was submitted on February 28th, 2025. The actual pricing libraries will be updated in the software on or before July 1, 2025.

CT DEEP, pursuant to WPN 23-6, will seek audit tool reapproval at least 6 months before the expiration of the previous approval. The latest version of the audit tool application was completed and submitted to DOE on February 28th, 2025, and is currently being reviewed by DOE. Upon approval, this new audit tool application will take effect.

Large Multifamily (5+ units): During Program Year 2025, CT WAP will direct Subgrantees to refer all large multifamily weatherization requests to the Multifamily Initiative Program which is administered by CT's utilities.

, formerly known as WAP- BIL, Large multifamily buildings (5+ units) will be pursued using IJIA funds as stated in the approved WAP BIL State Plan.

V 5.3 Final Inspection

The CT 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, QWP25) and the Connecticut WAP Inspection Tracker PY25 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 Subgrantee QCI final inspections will be conducted on **100%** of all completed units. Connecticut WAP policy maintains that Grantee QCI final inspections will be conducted on at least **10%** of all completed units. Connecticut WAP policy maintains that Grantee QCI in-process monitoring will be conducted on at least 10% of all production units as well. 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.

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, the Connecticut WAP Quality Work Plan requirements, Connecticut WAP Weatherization Field Guide SWS Aligned Edition, and the current program year's State Plan/Master File.*

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 CT WAP 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 (QCI QWP-25) and Connecticut 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/ QCI is the Auditor 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 the actual installation of measures at the site.

During PY25, CT WAP anticipates an increasing volume of unit completion throughout the PY. CT WAP 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 (PY 2025 Comprehensive Training).

Connecticut WAP will provide specific tracking to evaluate the QCI Inspection process, documenting 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 have been allocated to respond to increased needs as determined necessary.

Final evaluations will be used to assess 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% effective. No action is necessary.
- Level 2: Subgrantee and/or Subcontractor has had marginal or insufficient results responding to corrective actions on initial responses. Subgrantee and/or Subcontractor ultimately addresses all concerns and demonstrates improvement. The Subgrantee and/or Subcontractor may be subject to increased monitoring and/or inspections.
- Level 3: Subgrantee and/or Subcontractor has failed to address corrective actions and/or deficiencies repeatedly. This can result in temporary suspension and disallowed costs.
- Level 4: Subgrantee and/or Subcontractor continues to fail to address corrective actions and/or deficiencies repeatedly. Indefinite suspension, defunding of Subgrantee, and Subcontracted.

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 CT WAP Quality Work Plan (2025) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition, and the current year State Plan/Master File. An ongoing evaluation process is 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 , as well as:

- In-depth review of Monthly Status Reports ensuring that all expenditures are accurately reported and within State -approved budget limitations; and
- In-depth review of each Client Completion Report (CCR)) to ensure the NEAT, MHEA, or other approved auditing tool, lists of recommended measures were followed, and to ensure costs of individual measures are within the audit estimate.

The above documentation aids in a payment authorization to the Subgrantees. Any problems or questionable trends are flagged for review or investigation prior to issuing payments. DEEP reserves the right to review or investigate any questionable trends or expenses that are discovered during monthly review or the state monitoring.

Periodically, the frequency of measures installed is reviewed for each subgrantee to ensure statewide consistency. Periodically, average job costs are reviewed 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 Grantee also reviews the Subgrantee's procurement practices for 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.

Periodically, productivity and energy savings (tied to productivity) are compared among the Weatherization Service Areas.

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 Monitoring site visits will be used to determine 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 major monitoring activities, the proper delegation of financial responsibilities is confirmed, as well as the adherence to record retention policies and other financial systems. During routine monitoring activities as well as major monitoring, the Grantee reviews 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, the State reviews the Subgrantee's procurement procedures as well as the analysis of installed measures during file review to assure measures are being invoiced accurately.

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, CT WAP is working on coordinating with our utility partners to analyze the actual 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.

CT WAP is committed to effectively integrating fairness considerations and objectives into CT WAP. On the Grantee level we foster a welcoming and inclusive work environment. On the Subgrantee level our subgrantees are encouraged to hire workers from historically underrepresented groups. Each subgrantee is also given specific production goals to prioritize service delivery to regions and people historically underserved by CT WAP.

As a direct result of the onsite technical monitoring conducted in the summer of PY 2023 and the Ad-Hoc monitoring conducted during the Winter of PY 2024, CT WAP has implemented several changes which are documented in monitoring responses. These changes include adding additional metrics and KPIs to contracts, updating the modeling software inputs, adjusting which measures are screened and allowed per DOE guidance, and providing additional training and technical assistance to the Subgrantees to address deficiencies identified in the monitoring report.

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 Connecticut WAP Health and Safety Plan, CT WAP Operations Manual: Sec. 400 Health and Safety, and QWP 2025 , which are attached to this application. CT WAP tracks and budgets Health & Safety funds separate from Program Operations.

Connecticut WAP recognizes that conducting site-specific assessments, installing measures, and completing quality control inspections may present a range of barriers not previously encountered in the WAP. As federal and state policy and procedures are implemented, CT 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 through the entire weatherization process.

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, CT DEEP 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.

Please see the attached PY 2025 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 Operations Manual, CT WAP Forms, Hazard Identification forms and Operations manual which are also found at the following link: [Subgrantee Documents for Connecticut Weatherization Assistance Program](#)

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 is 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. Within DEEP, CT WAP is administered by the Bureau of Energy and Technology Policy (BETP) and is overseen by the Bureau Chief and Deputy Commissioner. BETP's Bureau Chief oversees the operations of the CT WAP staff and Subgrantees delivering the program.

DEEP also oversees 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 are collaborating to align these two programs to more effectively serve the low-income population of Connecticut. The goal of aligning these two programs is to offer low-income residents a more comprehensive list of both health and safety, and energy saving measures.

CT's Department of Social Services (DSS) is responsible for administering the Connecticut Energy Assistance Program (CEAP) which is funded with LIHEAP funding. 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 the WAP grant made to a State may be used by the Grantee and Subgrantees for administrative purposes in carrying out duties. No more than 7.5 percent may be used by the State for such purposes, and no 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 Subgrantees with allocations 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 PY25, CT WAP will be distributing the administrative allocation as follows:

- **DEEP** – 2.5%
- **Subgrantee(s)** – 12.5%

In future program years (beyond Program Year 2025), DEEP intends to revert to the historical allocation of 5% to DEEP and 10% to Subgrantees. However, due to the availability of other federal funds, and the need for Subgrantees to grow and restart services in Program Year 2025, DEEP proposes to allocate a greater percentage of administrative funding to Subgrantees than historically allocated.

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.

Connecticut also conducts monitoring for technical compliance with standards, performance measures, and applicable codes and other policies related to the installation of materials. CT DEEP conducts an annual Fiscal Audit of financial stability and accountability.

Note: All Monitoring activities will be conducted in compliance with DOE Guidance WPN 22-4, the Connecticut Weatherization Assistance Program Quality Work Plan (2025) requirements, Connecticut Weatherization Assistance Program Weatherization Field Guide Standard Work Specifications Aligned Edition, and the current year State Plan/Master File. For further information refer to the CT WAP Operations Manual sections 300, 400, 500, 600, and 700.

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

- Programmatic and Management Monitoring:
 - The CT WAP Operations Manual Sections 300, 400, 500, 600, and 800
 - The CT WAP SWS-aligned Field Guide.
 - WPN 22-4: Subgrantee Monitoring – Attachment 1 "Updated Checklists and Operations Manual"

Note: During the current program year, CT WAP will continue to adjust monitoring activities commensurate with the quality of work and the progress demonstrated by the subgrantee. Subgrantee monitoring will accept WPNs 22-4, WPN follow -- 24-22--4, and all other applicable DOE Guidance. CT WAP will perform comprehensive onsite monitoring statewide on an annual basis. Records reviews 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 24-4,22-4, CT DEEP will conduct more frequent monitoring of Subgrantees that

have been identified as having significant deficiencies.

The individual onsite monitoring activities are structured as follows:

- Annual Comprehensive Administrative Monitoring
- Annual Comprehensive Fiscal Monitoring
- Comprehensive Independent Quality Control Inspections of at least 10% of all completed units,
- Comprehensive Desk Monitoring which consists of a file review of at least 10% of all completed units.

CT WAP will utilize contracted Technical Advisory services 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), CT WAP 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. CT WAP 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. CT WAP 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 will provide for increased flexibility and effectiveness in conducting all QCI and monitoring activities as follows:

- Each Grantee-level inspector will document the relationship between the individual performing the Subgrantee-level QCI and the work, including the Subgrantee's QCI's independent status, their role in the audit process, and in any measure installation(s).
- Each Grantee-level inspection will contain documentation and verification that each Subgrantee-level QCI is performed in an impartial and complete manner.
- Each Subgrantee-level inspection is subject to Grantee-level inspection of effectiveness and compliance with program inspection policies. The Grantee-level inspection must contain 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 including 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
- Compensation: 100% Grantee T&TA (To include Travel & Expenses)

Weatherization State Team Members and their responsibilities for monitoring:

FIRST DRAFT

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	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	100% State Funding
Travel/Training Funding	100% Federal funding

Annual Comprehensive Monitoring of each subgrantee is performed via a team approach made up of Programmatic, Fiscal, and Technical Monitoring personnel utilizing the following instruments prepared specifically for use in Connecticut:

- CT WAP Annual Comprehensive Monitoring Tool
- CT WAP Annual Fiscal Monitoring Tool
- CT File Review Form For Desk Monitoring
- CT WAP QCI forms for field review

Programmatic and Fiscal Monitoring of Subgrantees

Following completion of the monitoring tools and follow up conversations with subgrantees, DEEP staff will review the information received and complete a Monitoring Report to be emailed to each subgrantee. 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.

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

Note: Significant findings such as waste, fraud, or abuse will be reported to DOE immediately. CT WAP reserves the right to disallow all costs related to a finding of waste, fraud, or abuse of funds.

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 policy, 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 the following program year participation.

In addition to these monitoring tools, DEEP conducts annual risk assessments of each subgrantee and checks for debarred or suspended status on SAM.gov. These activities inform the level of monitoring and the specific follow-up questions directed to subgrantees. 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.

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

Technical Monitoring of Subgrantees

CT WAP 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 CT WAP 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. CT WAP utilizes the following checklists for all Technical Monitoring activities:

- CT WAP Audit Checklist CT WAP Installer Checklist
- CT WAP Client Completion Report Review form
- CT Field Monitoring Tool for Field
- On-Site Field Review CT WAP Field Visit Form
- 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, CT WAP Weatherization Field Guide SWS Aligned Edition, and the current year State Plan/Master File and US DOE WPN 22-7 Health and Safety Guidance.

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

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 CT WAP 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.

Note: Any Subgrantee removal shall result in disqualification from the 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 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 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 is 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.

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 (Required)

Connecticut 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, CT WAP received feedback from DOE through technical and programmatic monitoring and has incorporated recommended training and technical support within the PY25 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.

CT 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.

All comprehensive training is to be provided through an IREC-accredited service provider. DEEP currently holds an existing contract with Green Jobs Academy (GJA) and will issue an RFP for an IREC certified provider prior in PY25 prior to the expiration of the existing contract with (GJA). CT WAP currently has at least two Energy Auditors and two Quality Control Inspectors at each Weatherization Service provider and will continue to train more qualified individuals as necessary to provide quality weatherization services.

V.9 Energy Crisis and Disaster Plan

Disaster Planning:

Connecticut has developed a state response framework 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 crisis or disaster response.

In the event of a Federal or State-declared disaster, Subgrantees may continue to use DOE WAP funds to support typical weatherization activities and shall prioritize service delivery to eligible households that fall within a designated area of the declared disaster.

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

Allowable measures are limited to those contained within:

- 10 CFR 440
- DOE WPN 22-7
- DOE WPN 24-1

All Costs are to follow the rules applied to the Weatherization Assistance Program as stated in:

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

Energy Related Crisis

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 with inoperable heating systems will receive priority service delivery. Service providers will conduct a site-specific health and safety audit, energy efficiency assessment, and heating system diagnostic test. If the home is eligible for a heating system repair or replacement, the Subgrantee will solicit proposals from contractors for the repair or replacement. CT WAP Subgrantees will ensure that appropriate actions are taken to address heating-related crises in a timely manner and deliver high-quality and comprehensive weatherization to all sites receiving emergency heating services. Any emergency replacements that cannot be addressed by WAP shall be referred to DSS's Connecticut Energy Assistance Program (CEAP).

Public Health Emergency

Crisis planning using T&TA funds is permissible when on-site WAP service delivery is suspended due to public health concerns.

In the event of a public health emergency, CT WAP will offer short-term guidance (ranging from 30 to 90 days) on the appropriate use of program funds. This guidance may cover areas such as program integrity, service delivery for ongoing units, preproduction activities, and unit completion. All incurred costs will still be included in the calculation of the ACPU for the respective Program Year.

CT WAP will also provide long-term guidance (ranging from 90 to 180 days) on the use of WAP Training and Technical Assistance (T&TA) funds. This guidance may address areas such as the program integrity and capacity of the service delivery network. All costs incurred during this time shall be reported in accordance with state and DOE guidelines for the respective Program Year.

V.10 Miscellaneous Section

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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 on the State Plan, and provides an opportunity for written comments. 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, 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 and water-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.

In PY25, CT WAP will apply to DOE to perform fuel switching and to install alternative energy efficiency measures (such as LEDs, heat pump water heaters, etc.) within the single-family and multifamily programs. Converting fossil fuel-based heating systems to all-electric heat pumps does improve the energy efficiency of a home's HVAC system. While fossil fuel-based heating systems can achieve 90% or greater efficiency, these systems rely on fuel combustion to create heat that is delivered to a home. In contrast, heat pumps move heat from outside the home, they do not generate the heat used in the system. Therefore, heat pumps can regularly achieve 100% or greater efficiency, meaning that they move more heat energy than the energy needed to operate the unit. 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. CT WAP 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, CT WAP will pursue the second option laid out in WPN 23-6 Attachment 5 as a policy administered by the Grantee. CT WAP will work with the selected subgrantees of the formula and IIJA, formerly known as BIL, allocations to determine how best to incorporate fuel switching into the programs and to submit the required submission documents to DOE. CT WAP will ensure that utility bill impacts are evaluated prior to recommending fuel switching to a program participant.

In PY25 CT WAP will also work with the selected subgrantees to explore incorporating solar PV, as allowed by WPN 23-6, into both the formula and IIJA, formerly known as, BIL programs. CT WAP. CT WAP 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.