

Program Year 2024 – Annual Weatherization Assistance Program (WAP) Application (Master File)

Connecticut Department of Energy & Environmental Protection (DEEP)

Eligibility

Approach to Determining Client Eligibility

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

Income means cash receipts earned and/or received by the applicant before taxes. Income does not include the exclusions identified in US Department of Energy (DOE) Weatherization Assistance Program (WAP) guidance, WPN 22--3. Gross income should be used to determine eligibility, 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.

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 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 least 200% percent of the poverty level 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 they are determined eligible for assistance for the Low- Income Energy Assistance Program (LIHEAP) under the Low- Income Energy Assistance Act of 1981. Administered by Connecticut’s Department of Social Services (DSS), LIHEAP limits program participation to households at or below 60% of state median income. Once a household has been deemed eligible for LIHEAP assistance through the Connecticut Energy Assistance Program (CEAP), the household is also considered automatically eligible for WAP, subject to confirmation of LIHEAP eligibility by DEEP.

Note: *The Grantee for CT WAP is DEEP. DSS administers LIHEAP.*

- 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 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 or B of the 2024 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% state median income, 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. ([2023-2024 HES-IE Application ENGLISH FILL.pdf \(energizect.com\)](#)).

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).

Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

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

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 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 would verify eligibility for CEAP include documentation of income (i.e., W-2 forms), documentation of liquid assets (i.e., checking and savings accounts, stocks, bonds, 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 of the low-income household caused by applying and submitting the same income verification documentation to

multiple federal programs. CT WAP will work with the Subgrantee network to create a process to serve all categorically qualified households.

CT WAP 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.

Describe Re-weatherization compliance.

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

CT WAP maintains an electronic database of all homes that were weatherized under DOE WAP, LIHEAP, HUD, and USDA fifteen or more years ago. Subgrantees are provided controlled access to this information for lookback purposes. The Grantee limits and monitors the number of such dwellings that each Subgrantee may re-weatherize and authorizes re-weatherization on a case-by-case basis.

Note: For further reference please see CT WAP Operations Manual 2022 Sec on 203.5.

Describe what structures are eligible for weatherization

Most dwellings currently being addressed by WAP in Connecticut are single-family dwellings, both owned and rented. The Subgrantee may not refuse to weatherize an otherwise eligible rental property. Weatherization services are to be provided to owner-occupied and rental properties alike with no priority given to either. Applicants from households who are renting must be ranked and verified in the same manner as households owning the property in which they reside. In most circumstances, the owner/landlord must contribute to the cost of weatherizing a rental property. Financial contributions are not required of property owners who are themselves at an income level where they would be eligible for weatherization assistance. Mobile homes are eligible for weatherization as well and are reported with the other types of housing stock in the quarterly reports. Caution must be exercised

when dealing with non-traditional dwelling units such as shelters, apartments over commercial properties, etc. to ensure they eligible. Weatherization of these properties must be reviewed with 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: 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:

- 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.
- No undue or excessive enhancement shall occur to the value of the dwelling unit, A properly executed energy audit with and energy conservation measure (ECM of 1 or greater would not constitute an undue enhancement

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 polices 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 signed Weatherization Agreement that they shall not increase the rent paid by eligible tenants of a rental unit that has received weatherization services for a period of two years

from the date the weatherization work is completed unless the landlord/property owner can document that the increase is due to factors other than the weatherization assistance performed. In compliance with 10 C.F.R. §§ 440.22(b)(3) and 440.22(e), tenants sign and receive a copy of the agreement, and therefore are aware of the conditions placed on the landlord. Landlords will also agree to charge the same rent to all successor tenants up to the two--year period covered by the Weatherization Agreement. In accordance with 10 C.F.R. §440.22(c), Connecticut may seek an agreement from the landlord 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, DEEP 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.
- For buildings 5+ Units CT WAP will set a requirement that 50% or more of the dwelling units must 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 PY23, CT WAP has a goal of serving at least 10 small multifamily buildings. Large multifamily buildings (5+ units) will be served using BIL funds as stated in the PY23 WAP BIL State Plan.

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 PY24, CT WAP has a goal of serving at least 23 small multifamily buildings. PY24 formula funds will not be used to weatherize buildings larger than 4 units. Large multifamily buildings (5+ units) will be served using BIL funds as stated in the PY23 WAP BIL State Plan

(<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 deferral 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 deferral are addressed within sixty (60) days of receipt. Should remediation take longer than that, eligibility must be reverified in accordance with State and Federal policy. Work must be completed within 12 months of the reverification eligibility determination date of the client.

Connecticut WAP will implement the DOE Deferral Tracking Tool in PY24 to assist with deferral tracking. Deferral conditions may include any of the following situations:

- The client has known health conditions that would be impacted by the installation of insulation or other measures.
- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent, and the conditions cannot be resolved cost-effectively;
- The building has sewage/other sanitary problems that may endanger client/weatherization workers if weatherization work were performed
- The building has been condemned or electrical, heating, plumbing or other equipment has been "red tagged" by local or State building officials or utilities;
- Moisture and drainage problems are so severe they cannot be resolved under existing guidelines.
- Dangerous conditions exist due to high carbon dioxide levels in combustion appliances, high levels of formaldehyde or other pollutants and volatile organic compounds (VOCs), and cannot be resolved under existing guidelines;
- The extent and condition of lead-based paint in the building would potentially create further H&S problems;
- The client is uncooperative, abusive, or threatening to auditor/crew/subcontractors or others who must work in/visit dwelling;
- In the weatherization auditor's judgment, any condition exists which may endanger H&S of work crew or subcontractor (e.g., extremely unsanitary conditions);
- In the weatherization auditor's judgment, illegal activities are taking place on the property;
- Infestation of pests cannot be reasonably removed or creates H&S concern for weatherization workers.

- Client exhibits sign(s) of hoarding behavior that prevents the installation of weatherization measures necessary to improve the home's efficiency;
- Radon levels or the perception of radon related conditions at the site prevent weatherization activities from being permitted by the client.

If at any point after an applicant has been selected from the waiting list the case is denied, Subgrantees must provide a written denial notice to the applicant. 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.

When the appeal is received at DEEP, DEEP will review the case. DEEP may request case file materials and speak personally to Subgrantee staff or 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

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.

CT WAP uses form 14: Notice of Postponement, to comply with the above requirements.

If a deferral is 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, CT WAP Form # 14, and CT WAP PY23 Health and Safety Template.

Weatherization Readiness Funds

Buildings deferred due to H&S reasons may be targeted for Weatherization Readiness Funds (WRF) or be routed to Connecticut’s Residential Energy Preparation Services program (REPS) before weatherization commences. In PY21, REPS was created by DEEP in conference with key stakeholders and members of Connecticut’s Energy Efficiency Board (EEB) as a comprehensive strategy to remove H&S barriers such as, mold, lead, and asbestos to ensure that direct benefits of energy efficiency improvements delivered by CT WAP are received by targeted beneficiaries.

Please see the following Weatherization Readiness Funding Plan:

Weatherization Readiness Funds (WRF) are designated for use by Grantees to address Health and Safety Barriers to Weatherization Activities being funded by the US Department of Energy Weatherization Assistance Program (WAP). This funding is intended to overcome barriers to weatherization. The following is the plan utilized in the state of Connecticut to expend the Weatherization Readiness Funding.

Distribution of Funding:

The State of Connecticut has been allocated \$380,474 for PY 24 and will allocate the funding in the following manner:

CT WAP Weatherization Readiness Funding

Connecticut Weatherization Assistance Program (CT WAP) Subgrantees

Community Renewal Team (CRT) - \$46,875
Center for EcoTechnology, Inc (CET) - \$46,875

Residential Energy Preparation Services (REPS) Provider

International Center for Appropriate and Sustainable Technology (ICAST) - \$286,724,

Total - \$380,474

WRF Average Cost Per Unit:

The Average Cost Per Unit for WRF is estimated to be \$1,480 per unit based on the number of units to be completed and the amount of Weatherization Readiness funding available. When Accounting for other braided funding sources the Average Cost Per Unit will likely reach \$15,000

WRF Maximum Per Unit:

The Maximum Per Unit spent to address health and safety barriers when accounting for braided funds will be set at \$31,600.

Prioritization of Dwellings:

WRF prioritization will follow the prioritization criteria used by the REPS program. Currently, REPS prioritizes customers with an active Connecticut Energy Assistance Program (CEAP) award letter (required to access a large portion of REPS funding) and projects that do not exceed the program's Maximum Cost Per Unit (MCPU) and that allow REPS to adhere to its required Average Cost Per Unit (ACPU). DEEP has determined that currently there is no need for more extensive prioritization criteria, as the program is able to serve each referral that falls into these existing prioritization parameters. However, if this changes, other criteria may be adopted by REPS in the future, such as priority for homes with high energy burden, homes located in a disadvantaged community, medical hardship customers, and/or projects with higher relative Savings to Investment Ratios (SIRs) once weatherization is completed.

Reporting/Tracking:

All households referred to REPS by WAP or 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 deferred from receiving weatherization services or referred to REPS to have the weatherization barrier addressed.

Reporting Categories:

All subgrantees who are utilizing the Weatherization Readiness Funding are subject to the WRF Reporting requirements outlined in WPN 23-4

In addition, as a condition of receiving WRF funding to address health and safety barriers to weatherization of DOE eligible households ICAST is required to submit monthly reports to DEEP. These reports must include:

- Count and descriptions of households assisted, including:
 - referral source.
 - Summary of each completed job
 - categorized expenses that include health and safety measure(s) 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).
- ICAST must also periodically distribute a survey (written or verbal) to collect customer and vendor satisfaction data and pending survey responses.
- Report to DEEP staff on issues such as satisfaction with ICAST staff, scheduling issues, implementation issues, quality of work, level of communication, and the degree to which the project impacted/disrupted residents' daily life.
- Subgrantees are required to use the DOE Deferral Tracker spreadsheet to document use of WRF funds to DEEP monthly.

Eligible Measures:

WPN 22-7 dictates which measures are allowable utilizing the WRF funding. If measures beyond the scope of WPN 22-7 are necessary then other leveraged funding is utilized such as LIHEAP or ARPA. The health & safety assessment completed by Subgrantees to refer a WAP job to Connecticut's REPS program will use Health & Safety funds, not WRF funding.

Process:

Each household serviced by WAP is first screened for any Health and Safety Barriers. If a barrier to weatherization is found by the weatherization subcontractor the household is evaluated utilizing the

DOE approved health and safety audit. Once the unit is evaluated it is then referred to ICAST to review develop a scope of work based on the weatherization barriers present. Once the barriers are addressed the home is inspected by a third-party inspector. If the inspection verifies that all barriers have been successfully remediated, the unit is referred to the weatherization subgrantee to complete weatherization measures.

Braiding Funds:

The Residential Energy Preparation Services (REPS) program utilizes both Weatherization Readiness Funds, ARPA, and LIHEAP Funding to address health and safety barriers to 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 REPS is conducted by a third party to ensure all the weatherization barriers have been addressed. Once that inspection is completed the household is then served by CT WAP and is subject to 100% final inspection by the service provider QCI and a minimum of 10% inspection by the state QCI with many of the households being inspected while work is in progress to ensure quality work is being completed. All Activities conducted utilizing WRF are reviewed as part of Grantees 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.

Definition of Children

Definition of children (below age): 6

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 submit an application 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.

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

In Program Year 2024 (PY24), DEEP will work with those Subgrantee(s) which are 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 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 low-income 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 Advisory Board (LIEAB) on PY24 program implementation strategies. LIEAB 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 PY24. 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.

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 younger than six (6) years of age. 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 are served priority is given to clients with whom they 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. A record is to be kept of the first time the client applied for weatherization to ensure a client does not lose their place on the waitlist when reapplying for weatherization services.

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

CT WAP will continue to refine the prioritization process to better facilitate cooperation with the Utility Partners and leverage their non-DOE resources to best serve WAP Households.

CT WAP will also work to develop a comprehensive approach to providing weatherization services to ensure equity for all including those who have been historically underserved, marginalized and adversity affected by poverty and inequality.

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 8.9.1 software. This data is then aggregated quarterly and entered in the PAGE QPR.

Definition of High Energy User Utilized in Connecticut

Connecticut will continue to work with our utility partners and the Connecticut Low-Income Energy Advisory Board 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 ethne be aggregated quarterly and entered in the PAGE QPR.

Climatic Conditions

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

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

The Weatherization Assistant 8.9 Audit tool utilizes Hartford, CT as the only weather file located within Connecticut. CT WAP recognizes Hartford, CT as the city which 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.

Heating degree days were calculated with NOAA Climatic Data 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 PY23 analyses, but CT WAP will work to develop a plan to address the replacement of cooling systems in collaboration with DOE starting in August 2024.

The goal will be to develop a clear process and plan for including cooling system replacements in the PY24 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.

Type of Weatherization Work to Be Done

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 will overhaul the existing CT WAP Operations Manual to reflect the increase in the scale of operations to accommodate servicing small multi-family buildings across the State.

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, and incidental repair measures (IRM), and Final Inspections.

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

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

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

All documentation utilized for the purpose of executing contracted services and/or guiding fieldwork shall be fully aligned with Standard Work Specifications (SWS) and contains language that confirms

Subgrantee and/or contractor's receipt, cognizance, and confirmation of communicated materials as referenced above. All work performed by 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 and the CT WAP Operations Manual Edition and the Current year State Plan/Master File as part of the executed agreement between the Grantee and subgrantee and the subgrantee and direct hire contractors.

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

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

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

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

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

Additional Program Information

During PY24 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: Repairs where the cost exceeds \$750. Examples of major repairs include, but are not limited to: Repairing roof leaks, repairing unsafe electrical wiring, and removal of knob and tube wiring for the purpose of installing attic and sidewall insulation.

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

Minor Repairs: Repairs that may be considered Incidental Repair measures, equal or under \$750 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 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: 8/13/2021

Manufactured Housing: 8/13/2021

Multi-Family: PY2024

Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-family

Audit Name: Other (specify)

CT WAP is DOE- approved (8/27/2020) to continue to utilize the site-specific, Weatherization Assistant 8.9 (NEAT) Audit tool software. Only measures that achieve an individual SIR of 1 or more are allowed.

Approval Date: 8/27/2020

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

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

Audit Procedure: Multi--Family

Audit Name: Other (specify)

CT WAP is exploring implementing the use of TREAT audit tool for multi-family for BIL funds.

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.

Connecticut WAP is currently conditionally approved to utilize MHEA for manufactured housing. To retain full approval, DEEP must submit 8 sample audits to DOE. Connecticut WAP will work with the subgrantees to develop a timeline of when these sample audits can be performed and sent to DOE.

Connecticut WAP is currently working with Hancock Software Inc. to implement a weatherization database management system and will transition to the MINT auditing software for single family site-built housing in PY 2024.

State level Experts continue to closely monitor the NEAT audit tool proficiency of all Subgrantees. SWS aligned QWP-24 Setup libraries will be distributed on or before July 15, 2024.

CT DEEP pursuant to WPN 23-6 will seek audit tool reapproval at least 6 months before the expiration of the previous approval.

Multifamily: During Program Year 2024, CT WAP will direct Subgrantees to refer all large multifamily weatherization requests to the WAP-BIL weatherization programs, which can provide comprehensive weatherization services to these sites. CT WAP will submit to DOE for approval any multifamily project deemed eligible for services. CTWAP 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 PY23, CT has a goal of serving at least 10 small multi-family buildings.~~ Large multifamily buildings (5+ units) will be pursued using BIL funds as stated in the approved WAP BIL State Plan. It is estimated that multi-family households will represent 20% or less of the eligible holds served by CT WAP in PY 2024. All multi-family projects served by CT WAP will be reviewed by DOE on a case-by-case basis/

CT WAP will explore new audit tool approvals for PY24 such as the Hancock MINT Energy Audit tool, which will enable a more streamlined approach to data management and TREAT to address multi-family properties that cannot be served with existing DOE approved audit tools.

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, QWP23) and the Connecticut WAP Inspection Tracker PY24 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 QCI In--Process Monitoring will be conducted on at least 10% of all production units as well.

Note: All Final QCI Inspection conducted on work performed and reported as DOE completed CT WAP sites must be in compliance with both 10 CFR § 440.21 and DOE WPN 22--4 and the Connecticut WAP Quality Work Plan requirements, Connecticut WAP Weatherization Field Guide SWS Aligned Edition , and the current year State Plan/Master File.

Attendees that fail to achieve certification beyond that point are required to make arrangements with their respective agencies regarding additional training and testing costs as soon as possible, contingent upon CT WAP approval. Failure of any 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-23) and Connecticut WAP Quality Work Plan.:

Independent QCI: This individual has no direct involvement in the prior work on the home either as the Auditor or as a member of the installation crew. A Grantee or DOE approved representative or third-party QCI will perform at least 10% of all completed units.

Auditor/QCI: The Auditor who performs the audit and creates the work order 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, CT WAP 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 dual role of Auditor/Inspector is able to effectively and consistently perform both tasks on a regular basis.

During PY24, CT WAP anticipates an increasing volume of unit completions 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 2024 Comprehensive Training).

Connecticut WAP will provide specific tracking to evaluate the QCI Inspection process to document the range of controls outlined in WPN 22--4. Each CT WAP QCI Inspection Certificate identifies relationships

of Auditor, Auditor/QCI, and/or Independent QCI. Projected monitoring and Final QCI Inspection goals have been created and funds allocated to respond to increased needs as determined necessary.

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

- Level 1: Subgrantee and or Subcontractor has routinely responded to corrective actions 100% effective.
- Level 2: Subgrantee or Subcontractor has had marginal or insufficient results responding to corrective actions on initial responses. Subgrantee or Subcontractor ultimately addresses all concerns and demonstrates improvement (subject to increased monitoring and inspection).
- Level 3: Subgrantee or Subcontractor has failed to address corrective actions and or deficiencies repeatedly. (Resulting in temporary suspension and disallowed costs).
- Level 4: Indefinite suspension, defunding of Subgrantee, and Subcontracted resources.

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 (2024) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition , and the current year State Plan/Master File. There is an ongoing evaluation process used to determine the overall effectiveness of each subgrantee. This is done through the annual monitoring processes that are outlined in DOE WPN 20--4, and through an ongoing review process including a mid-year assessment of program implementation, as well as:

- In-depth review of Monthly Status Reports ensuring that all expenditures are accurately reported and within State -approved budget limitations;
- In depth review of each Building Weatherization Report (BWR) to ensure the NEAT, MHEA, or other approved auditing tool Audit list of recommended measures was followed, and to ensure costs of individual measures are within the audit estimate;

The frequency of measures installed is tracked for each subgrantee to ensure statewide consistency; Average job costs are tracked to ensure that the subgrantee is within State mandated limits; and jobs are tracked regionally to ensure adequate and fair coverage across the entire State.

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 State 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.

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

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

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

During major monitoring activities, proper delegation of financial responsibilities is confirmed, as well as record retention policies and other financial systems. During regular monitoring activities, as well as major monitoring, we review the tracking of technical compliance, such as Lead Renovation, Repair, and Painting (LRRP) and Health and Safety.

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

The State is 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 services 3,000 -to3,500 income eligible homes per year, and 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 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.

CT WAP is committed to effectively integrating diversity, equity, and inclusion objectives into CT WAP. On the Grantee level we foster a welcoming and inclusive work environment and follow the CT DEEP DEI policy. 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 peoples 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 KPI's 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. For additional information please see the monitoring response attached to this application.

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 should 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 if recipients in a county, city, or a zip code that does not compromise the privacy of recipients.

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 2024 as attachments to this application.

Connecticut WAP recognizes that conducting site-specific assessments, installed measures, quality assurance, and quality control services will present a range of hazards not previously encountered in the WAP. As federal and state policy and procedures are implemented, 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 from client intake and prioritization of services through unit completion.

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

Please see the attached PY 2024 Grantee Health & Safety Plan found in the MISC. Section 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 found at the following link: [Subgrantee Documents for Connecticut Weatherization Assistance Program](#)

Program Management

Overview and Organization

WAP administrative policies and procedures are outlined in Section 100 of the CT WAP Operations Manual, which is regularly updated and publicly available online at DEEP's webpage.

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

DEEP also has oversight of the ratepayer--funded and Conservation & Load Management residential low-income energy program known as HES--IE. The HES-IE program serves the same population as WAP in Connecticut and currently cost shares many measures reported on DOE WAP units. The alignment of

the HES--IE program with WAP is a near-term goal of DEEP to ensure the best quality service for the low-income population.

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

BETP administers the State Energy Program (SEP) grant, generally by the same office that administers WAP. HUD/ housing programs are administered through the Connecticut Department of Housing

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

For PY24, CT WAP will be distributing the administrative allocation as follows:

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

In future program years (beyond Program Year 2024), DEEP intends to revert back 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 2024, DEEP proposes to allocate a greater percentage of administrative funding to Subgrantees than historically allocated.

Monitoring Activities

Connecticut's monitoring approach will include the following components: Administrative review of documents and reports related to the organization, operation, and performance of local service delivery.

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

accountability.

Note: All Monitoring activities will be conducted in compliance with DOE Guidance (WPN 20-4) and the Connecticut Weatherization Assistance Program Quality Work Plan (2024) 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 Guidance and references the following CT WAP documents regarding specified approach areas:

Programmatic and Management Monitoring

- The CT WAP Operations Manual Sections 300, 400, 500, 600, and 800 and the CT WAP SWS-aligned Field Guide.
- WPN 22-4: Subgrantee Monitoring
- The CT WAP Operations Manual Sections 100, 300, 400, 500, 600, and 700 and the CT WAP SWS aligned Field Guide

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

Note: During the current program year, CT WAP will continue to adjust monitoring activities commensurate with the quality of work and the progress demonstrated by the subgrantee. Subgrantee monitoring will accept WPN 20-4 and 22-4 Guidance and all other applicable DOE Guidance. CT WAP will perform comprehensive onsite monitoring statewide on an annual basis. Records reviews at the subgrantee's office will involve multiple visits and may be focused on regions of the state, resulting in separate annual monitoring events according to region. At a minimum, there will be a total of at least 12 days of onsite monitoring.

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

- Comprehensive Administrative/ Fiscal Monitoring (annual) based on PY23 allocation.
- Technical Site Visit Monitoring (minimum of 10% of completed units and a minimum of 20% file review of completed units)

Note: While this exceeds DOE minimum standards, the recent audit tool implementation and QWP24 standards compliance warrant additional activities to ensure the best outcomes. Actual program year totals may be adjusted to DOE minimum levels if midyear assessments indicate consistent acceptable performance at any Subgrantee.

CT WAP will utilize contracted QCI services via a T&TA Subgrantee to conduct QCI inspection of at least 10% of all reported DOE completed units. As part of our contract(s) with Subgrantees and as a part of our annual monitoring visit, CT WAP can require the Subgrantee to submit their most recent 2 CFR 200 Financial Audit. These audits can be reviewed and approved by DEEP's Business Office. CT WAP will continue to contract the services of a Technical and Monitoring Compliance Consultant via a T&TA Subaward(s) to provide all Quality Control Inspections and field monitoring services. A dedicated, full-time Technical Monitor, employed or contracted by DEEP, will continue to provide monitoring and support services under the direction of Weatherization Program Management.

CT WAP anticipates that Subgrantees will utilize components of the DOE prescribed standard options to conduct Quality Control Inspections as defined in WPN 22--4.

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

- Each QCI inspection will document the relationship between the individual performing the Quality Control Inspection to the work including; independent status, role in the audit process, and role in any measure installation(s).
- Each QCI inspection will contain documentation and verification that each quality control inspection is performed in an impartial and complete manner.
- Each QCI inspection is subject to Grantee level assessment of effectiveness and compliance with program inspection policies and contains documentation of any findings related to the quality of the inspection and impartiality of the inspection process.
- The Grantee will maintain tracking of all Grantee QCI activities to include all aspects of the Grantee developed QCI process, subsequent corrective actions, and final outcomes.

Contracted resources:

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

Weatherization State Team Members and their responsibilities for monitoring:

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

Position	Research Analyst
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	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 instruments prepared specifically for use in Connecticut:

- CT Annual Administrative Review Monitoring Tool
- CT Annual Administrative Review Fiscal Monitoring Tool
- CT Field Monitoring Tool for File Review and onsite Field Review CT WAP Field Visit Form

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

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

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

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

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

- Consistent production of substandard workmanship, with no measurable improvement Inadequate Fiscal and or Management policy, procedures, enforcement, or controls.
- Failure to improve current Management systems within stated notification time frames and or implementation of corrected policy, procedures, and practices.

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

All Subgrantee monitoring is routinely tracked and analyzed to provide accurate classification of findings

to detail specific incidents, resolution timelines, and training requirements necessary for incremental and annual planning and reporting.

By consolidating multiple site visits and file review visits, DEEP aims to optimize the number of onsite visits needed statewide.

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

Flexibility in scheduling has been factored into planning to allow additional visits or training as necessary. Additional information will be included in the attached T&TA Planning and Reporting template.

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

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

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

- CT WAP Audit Checklist CT WAP Installer Checklist
- CT WAP BWR Review form
- CT Field Monitoring Tool for Field and On-Site Field Review CT WAP Field Visit Form
- DOE WPN 20-4 and 22-4

Note: All Technical Compliance Monitoring will be conducted in compliance with DOE WPN 22-4 and the CT WAP Quality Work Plan (2024) requirements, CT WAP Weatherization Filed Guided SWS Aligned Edition , and the current year State Plan/Master File and USDOE 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.

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

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

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 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 assure that corrective actions are effective and continuous.

Training and Technical Assistance Approach and Activities

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

To ensure the consistent delivery of high-quality weatherization services nationwide the DOE, through a network of Weatherization Professionals, identified and developed a set of core competencies for the various staff positions that implement WAP including the types of training required to increase levels of

core competencies for these job categories. The goal is to increase the levels of competencies and expertise in the workforce so that every house that is weatherized receives appropriate, properly installed cost-effective measures.

Although many of the core competencies and job classifications identified are universal, not all the core competencies will be appropriate for the job classifications identified in every state. For instance, testing, repairing, or replacing heating and cooling systems in Connecticut requires certification or licensing from the State. Therefore, the Auditor or Weatherization Installer may not be able to conduct this work. In Connecticut, work on heating and cooling systems must be subcontracted to a licensed contractor outside of WAP. However, just because a heating, ventilation, and air conditioning (HVAC) contractor is licensed by the state does not mean he possesses the competencies required. Additional training for these contractors may be required, or someone at the local agency must be competent 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 and local weatherization staff on program operations, management, and technical topics. Staff members receive training at national and regional conferences, regional and state training centers, state and Subgrantee provided workshops, and in the field.

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

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 – for the duration of the grant period.

Energy Crisis and Disaster Plan

Disaster Planning:

Connecticut has developed a state response framework, which 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 function 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 beyond the allowable activities specified in WPN 17-7.

In the event of a Federal or State declared disaster, Subgrantees may use DOE WAP funds in support of typical weatherization activities and shall prioritize service delivery to those eligible households which fall within a designated area of a 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 12-7

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

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 to conduct comprehensive site-specific health, safety, and energy efficiency assessments and initiate heating system diagnostics and repair or replacement proposals. CT WAP Subgrantees will ensure that appropriate actions are taken to

address heating related responses in a timely manner and deliver high-quality comprehensive weatherization to all sites receiving emergency heating services. Any emergency replacements that cannot be addressed by WAP are referred to the 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.

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

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

Miscellaneous Section

In PY24, CT WAP will apply to DOE for the ability to perform fuel switching and to install alternative energy efficiency measures (such as LEDs, heat pump water heaters, etc.) within the CT WAP formula and BIL fund allocations. 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+% efficiency, these systems rely on fuel combustion to create the 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+% efficiency (i.e., they move more heat energy than the energy needed to operate the unit). However, due to different prices for different energy sources – electricity, natural gas, oil, and propane – a home's heating/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 BIL allocations to determine how best to incorporate fuel switching into the program 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 PY24, 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 BIL programs. 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.

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