

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

(Grant Number: EE0009977, State: CT, Program Year: 2022)

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Income means cash receipts earned and/or received by the applicant before taxes. Income does not include the exclusions identified in Department of Energy (DOE) Weatherization Assistance Program (WAP) guidance, WPN 223. Gross income should be used to determine eligibility, not net income.

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.

Consistent with 10 C.F.R. § 440.22(a), Connecticut WAP considers a household eligible for WAP once they are determined eligible for assistance for the Low-Income Home Energy Assistance Program (LIHEAP) under the Low-Income Energy Assistance Act of 1981. Administered by the 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.

For multi-family dwellings, at least two-thirds of the tenants must be income-eligible. WAP eligibility also extends to the Department of Housing and Urban Development (HUD) means tested programs as outlined in WPN 225.

Eligibility expires 12 (twelve) months from certification date under CEAP if an energy audit has not been initiated.

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

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

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

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

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

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 backup documentation verifying the information obtained in the interview. See § 203.6, Proof of Ownership, CT WAP Operations Manual.

Verification of income eligibility for both owners and renters 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. W2 forms) and proof of receipt of Temporary Family Assistance or other state or federal cash assistance programs. All documentation of income gathered through CEAP eligibility must be verified by CT WAP staff to confirm eligibility. See §§ 201.3, 202, 202.2, CT WAP Operations Manual.

Describe Reweathering compliance

Since many households have never received weatherization services, the state policy documented in the Connecticut 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 (fifteen) years. This does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) or from receiving non- federal assistance for weatherization. All units that are eligible to be reweatherized will receive a new energy audit.

Connecticut WAP maintains an electronic database of all homes that have been weatherized under DOE WAP, LIHEAP, HUD and the US Department of Agriculture (USDA) 15(fifteen) or fewer 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 reweatherize and authorizes re-weatherization on a case-by-case basis.

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

Describe what structures are eligible for weatherization

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

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

Describe how Rental Units/Multifamily Buildings will be addressed

Connecticut WAP, in accordance with 10 C.F.R. § 440.22(b)(3), has established procedures to ensure that benefits of weatherization assistance in rental units accrue primarily to the low-income tenants residing therein.

Connecticut WAP is currently conditionally approved by DOE to weatherize manufactured homes and single-family housing (8/27/2020) and will utilize BIL grant funding to acquire accreditations and specialized staff to weatherize multifamily housing, which will be a focus of the WAP-BIL State Plan. Multifamily weatherization will be conducted in accordance with WPN 16-5.

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

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weatherization services for a period of two years from the date the weatherization work is completed unless the landlord/property owner can document that the increase is due to factors other than the weatherization assistance performed. In compliance with 10 C.F.R. §§ 440.22(b)(3) and 440.22(e), tenants sign and receive a copy of the agreement, and therefore are aware of the conditions placed on the landlord. Landlords will also agree to charge the same rent to all successor tenants up to the two-year period covered by the Weatherization Agreement. In accordance with 10 C.F.R. §440.22(c), Connecticut may seek an agreement from the landlord whereby Connecticut reserves the right to seek a lien against the landlord's property in the event the landlord does not comply with rent increase or other prohibitions.

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

Note: For further reference please see Connecticut WAP Operations and Training Manual 2022 Section 203.

Describe the deferral Process

When conditions warrant, it may be necessary to defer work in a dwelling, postponing until an identified 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 the subgrantee performing the services. 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 six months 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 original eligibility determination date of the client.

Connecticut WAP will implement the DOE Deferral Tracking Tool throughout the BIL grant period 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; or
- Radon levels or the perception of radon related conditions at the site prevent weatherization activities to be permitted by the client.

Single family buildings (up to 4 units) which are deferred due to H&S reasons may be referred to the Statewide Weatherization Barrier Remediation Program (WxBRP) before weatherization commences. In PY21, WxBRP was created by Connecticut DEEP, with input from key stakeholders and members of Connecticut's Energy Efficiency Board (EEB) as well as the Connecticut Low-Income Energy Advisory Board (LIEAB), as a comprehensive strategy to

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remove H&S barriers to weatherization such as mold and asbestos.

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 by the above requirements.

If a deferral or postponement 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 income 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 PY22 Health and Safety Template.

V.1.3 Definition of Children

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

V.1.4 Approach to Tribal Organizations

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

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

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

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V.2 Selection of Areas to Be Served

Connecticut uses one or more entities authorized by 10 C.F.R. § 440.15 to deliver services as Subgrantees (subcontractors), which entities have demonstrated experience and performance in weatherization or housing renovation activities; experience in helping low-income persons in the area to be served; and capacity to undertake a timely and effective weatherization program.

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

During the BIL grant period, DEEP will work with our selected Subgrantee(s) to deliver services to multifamily housing of five (5) or more units. While a focus of the BIL grant funds will be on multifamily housing, DEEP shall retain the capacity to service single-family and manufactured homes using BIL funds. The production goals of the BIL grant period are determined by the availability of Program Dollars. At full production, Connecticut WAP anticipates weatherizing 3,500 units during the BIL grant period. Connecticut WAP will focus efforts in areas of the State which are determined to be Environmental Justice communities as defined by Conn. Gen. Stat. § 22a-20a as well as HUD qualified census tracts. Selected Subgrantee(s) shall be required to service the entire state and shall not discriminate on the basis of location, but rather shall follow routine prioritization guidance when scheduling clients for service. Connecticut WAP is actively working to understand how funding provided in the Inflation Reduction Act (IRA) can be used to assist with these goals.

In PY22, Connecticut WAP will issue an RFP to identify and select a Subgrantee(s) for implementation of the BIL grant.

Connecticut DEEP will seek the input of LIEAB, which DEEP has designated as its Policy Advisory Council (PAC). LIEAB is an independent body whose membership includes stakeholders such as Community Action Agencies (CAAs), State Agencies, Non-Profits, and Quasi-Public Organizations. These key stakeholders assess how to improve the delivery of services statewide throughout the BIL grant cycle. In addition, Connecticut WAP will be presenting the BIL State Plan at a technical meeting on heat pump deployment in affordable housing that will inform Connecticut’s Comprehensive Energy Strategy (CES) through public feedback. Finally, Connecticut WAP is enabling participatory and inclusive processes to program design by translating notices and the BIL State Plan into Spanish.

Throughout the period of performance of the State Plan, Connecticut DEEP will engage with community-based organization, unions, and community colleges committed to workforce development, diversity, energy justice, and representative of underserved communities to aid in implementation and solicit feedback on performance of WAP and the State Plan.

Former Subgrantees and subcontractors are not precluded from seeking to provide services if they can demonstrate the technical and programmatic capacity and financial stability needed to implement the program. Through ongoing monitoring as well as training and technical assistance, Connecticut works to ensure that all Subgrantees maintain administrative, programmatic, and technical staff or vendors capable of operating a successful program. Connecticut DEEP will also seek the input of these key stakeholders and the public on how to braid IRA funding with WAP to enable comprehensive weatherization with high performance energy technologies that have been established as policy priorities by the State.

Connecticut WAP will evaluate equity in WAP participation by analyzing the populations served by program and determining whether benefits are distributed equitably among underrepresented and overburdened groups. Connecticut WAP is committed to ensuring equitable delivery of WAP services to environmental justice communities, communities of color, disadvantaged communities as defined by the Justice40 Initiative, and census tract communities with high average energy burdens. CT WAP will work with DOE to find pathways to prioritize and provide services to these underserved populations. In addition, Connecticut WAP will establish outreach and educational strategies to engage culturally specific and responsive community organizations to ensure communities of color are aware of and have the ability to access weatherization services.

V.3 Priorities

Clients determined eligible through LIHEAP procedures receive, with their notice of eligibility, weatherization information which they complete and return if they are interested in receiving weatherization services. Priority is given to clients most vulnerable, including households with a member who is elderly (60 years and older), disabled, or younger than six (6). Priority consideration is also given to households with high energy use and/or a high energy burden. Additional consideration will be given to applicants that have waited the longest for WAP services and are not currently being served due to vulnerable households having higher priority. DSS provides to DEEP the list of households eligible for LIHEAP.

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High Energy Use Priority

A household with an annual heating cost exceeding \$2,500.

High Energy Burden Priority

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.

V.4 Climatic Conditions

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

Connecticut WAP recognizes Hartford, CT as the city which best represents the average climate conditions within Connecticut at 5,278 heating degree days. All site specific audits conducted within Connecticut will utilize Hartford, CT as the selected weather file.

Heating degree days were calculated through NOAA Climatic Data for a period of 29 calendar years from 1991 through 2020.

Based on this information:

- The central part of the State (Hartford) averaged 5,995 heating degree days.
- The southeastern part of the state (Bridgeport) averaged 5,249 heating degree days.
- The northeast part of the State (Windham) averaged 6,068 heating degree days.
- The northwest part of the state (Waterbury) averaged 6,422 heating degree days.
- The southcentral part of the state (New Haven) 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 our analyses but will be considered in future program year analyses.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

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

Note: All work performed and reported as completed must be in compliance with DOE WPN 224 and the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide Standard Work Specifications (SWS) Aligned Edition Version (083021), The CT WAP Operations Manual (Revised 2022) and the current Year State Plan/Master File.

- During the BIL grant period, DEEP will overhaul the existing Connecticut WAP Operations Manual to reflect the increase in the scale of operations to accommodate servicing multifamily buildings across the State.
- In accordance with WPN 224, Connecticut WAP will provide Subgrantees and/or contractors with technical requirements for fieldwork including, but not limited to, audit/testing policy and procedures; installation of energy conservation measures (ECM), H&S, and incidental 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.

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- Connecticut WAP requires documentation of all executed direct hire and vendor agreements to be provided within 2 business days of full execution of agreements.
- All documentation utilized for the purpose of executing contracted services and/or guiding fieldwork shall be fully aligned with Standard Work Specifications (SWS) and contains language that confirms Subgrantee and/or contractor's receipt, cognizance, and confirmation of communicated materials as referenced above. All work performed by Connecticut WAP Subgrantees and/or contractors must be consistent with Connecticut WAP SWS aligned Field standards and SWS aligned Field Guides.
- Connecticut WAP has provided electronic links on the program webpage to the Connecticut WAP Quality Work Plan, Connecticut Weatherization Field Guide SWS Aligned Edition (083021) and the Connecticut WAP Operations Manual (Revised 2022) Edition and the Current year State Plan/Master File as part of the executed agreement between the Grantee and subgrantee and the subgrantee and direct hire contractors.
- Connecticut WAP shall ensure that all activities will comply with DEEP's Historic Preservation Programmatic Agreement (PA) (2020) and DEEP's NEPA determination. Any activities pursued outside of the allowable activities of the PA or the NEPA Determination shall require an Environmental Questionnaire (EQ1) to be submitted to DOE for review. Both the PA and NEPA Determinations shall be made available to CT WAP Subgrantees.
- Connecticut WAP has produced work quality standards that continuously align with DOE WPN 224, The CT WAP Quality Work Plan, CT Weatherization Field Guide SWS Aligned Edition (083021), and the current year State Plan/Master File.
- Connecticut WAP Monitoring shall conduct an ongoing assessment of Subgrantee staff and contracted resources to ensure that all personnel engaged in installed measures are aware and practicing work standards in compliance with DOE WPN 224, The Connecticut WAP Quality Work Plan (2022), The Connecticut Weatherization Field Guide SWS Aligned Edition (083021), The Connecticut WAP Operations Manual (Revised 2022) Edition and the current year State Plan/Master File.
- Connecticut WAP Monitoring shall ensure that 100% of weatherized homes are inspected in compliance with DOE WPN 224, The Connecticut WAP Quality Work Plan (2022), The Connecticut WAP Weatherization Field Guide SWS Aligned Edition (083021), The CT WAP Operations Manual (Revised 2022) Edition and the current year State Plan/Master File.
- Connecticut WAP Subgrantee contracts for services with weatherization contractors must also include an acknowledgment of the receipt of communication of links to the Connecticut WAP Field Guide, SWSs, and Standards as outlined in DOE WPN 224 Section 2.
- Connecticut WAP will submit a multifamily field guide to DOE for approval prior to any work commencing on MF buildings containing 5 or more units.

Additional Program Information

Spending limits have been established as follows:

- Up to \$10,000 on ECMs, including Ancillary and Incidental Repair Measures and Program Support Costs, or submit a request for prior Grantee Approval.
- Up to \$1,500 for H&S Measures or submit a request for prior Grantee approval.
- Up to \$2,500 for Incidental Repair Costs or submit a request for prior Grantee approval.
- Definitions of allowable repairs are as follows:
- 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 195.
- Minor Repairs: Repairs that may be considered Incidental Repair measures, under \$500 may include cut and finish, access to attics and knee walls, siding repairs, and minor repairs associated with windows, doors, flashing, and masonry moisture infiltration points.
- In all cases, the WAP client file must provide clear documentation of the need for the repairs and the relationship with the energy conservation measures that are enhanced or protected directly related to the repair. Documentation must include pictures and detailed descriptions of the repairs and invoiced costs presented by the contractor.
- Note: See WAP Operations Manual Section 311 and Section 702
- Example contract language used in all Subgrantee contracts:
- "All work performed must be in compliance with the DOE and CT WAP guidance, the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide SWS Aligned Edition, and the current CT WAP State Plan, available on DEEP's webpage."

Field guide types approval dates

Single-Family: 8/13/2021
Manufactured Housing: 8/13/2021
Multi-Family:

V.5.2 Energy Audit Procedures

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Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: NEAT
Approval Date: 8/27/2020

Audit Procedure: Manufactured Housing
Audit Name: MHEA
Approval Date: 8/27/2020

Audit Procedure: Multi-Family
Audit Name: MulTEA
Approval Date:

Comments

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 aims to have 95% of the units weatherized come from multifamily buildings. We will work with CAAs, DOH, and DSS to target multifamily units and buildings in need of weatherization.

Prior to the approval of a multifamily audit tool, CT WAP will submit all buildings scheduled for weatherization to DOE for approval. No multifamily buildings of 5 or more units will be weatherized without written consent from DOE.

V.5.3 Final Inspection

The Connecticut WAP mechanism for adjusting Quality Control Inspector (QCI) Final Inspection and QCI InProcess Monitoring rates is based on results and information captured within the Connecticut WAP Quality Control Inspection Report (QCI, QWP22) and the Connecticut WAP Inspection Tracker Spreadsheets. Within those documents are activity rates stated as percentages, as well as action levels for increased QCI Final Inspection and QCI InProcess 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 10% of all completed units.

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

Note: All Final QCI Inspections conducted on work performed and reported as DOE completed Connecticut WAP sites must be in compliance with DOE WPN 224 and the Connecticut WAP Quality Work Plan requirements, Connecticut WAP Weatherization Field Guide SWS Aligned Edition (083021), and the current year State Plan/Master File.

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

- Independent QCI: This individual has no direct involvement in the prior work on the home either as the Auditor or as a member of the installation crew. A Grantee or DOE-approved representative or third party QCI will perform at least 10% of all completed units.
- Independent Auditor/QCI: The Auditor who performs the audit and creates the work order also performs the final QCI inspection. The auditor cannot be involved in actual installation of measures at the site.

Note: When subgrantees use the Auditor/QCI model, Connecticut WAP will ensure quality assurance monitoring to 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

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Auditor/Inspector is able to effectively and consistently perform both tasks on a regular basis.

Connecticut WAP will provide specific tracking to evaluate the QCI Inspection process to document the range of controls outlined in WPN 224. 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.

V.6 Weatherization Analysis of Effectiveness

All Connecticut analyses of effectiveness will be conducted in compliance with DOE WPN 224 and the CT WAP Quality Work Plan (2022) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition (083021), and the current year State Plan/Master File. There is an evaluation process used to determine the overall effectiveness of each selected Subgrantee. This is done through the annual monitoring processes that are outlined in DOE WPN 204, and through an ongoing review process including a midyear 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 audit list of recommended measures was followed, and to ensure costs of individual measures are within the audit estimate; and that average job costs are tracked to ensure that the subgrantee is within state-mandated limits.

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

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

The goal is uniformly effective implementation of 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 (Comprehensive and Specific) at the state and Subgrantee levels. Site visits of specific Subgrantees will be increased if deemed necessary to ensure that training has had the desired effect of reducing issues and corrective actions in the field.

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

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

The State is constantly improving its management of WAP by attending NASCSP conferences and orientations, participating in Regional NASCSP conference calls, learning best practices from other states, and leveraging the help and knowledge of the DOE WAP program managers. Connecticut WAP is continually working with in-state utility partners to evaluate installed measure costs and to utilize a streamlined approach to deliver effective and quality weatherization and energy efficiency services to the Connecticut Low-Income community. The utility administered Home Energy Solutions Income Eligible (HES-IE) program services 16,000 20,000 income-eligible homes per year, and CT DEEP and the utilities are continuously working to standardize requirements between the

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service delivery models. Connecticut WAP will seek opportunities and partnerships to improve and expand WAP activities within the state to provide supplemental resources or services to increase flexibility of the funds. Additionally, Connecticut WAP works with the subgrantees to ensure each household serviced receives the maximum amount of services available within the expenditure limitations to maximize energy savings, including a comprehensive weatherization approach. Connecticut WAP will explore the opportunities provided with the passage of Public Act 21-48, An Act Establishing an Energy Efficient Retrofit Grant Program for Affordable Housing, to better provide whole home energy retrofits in conjunction with complementary incentive programs in WAP.

Connecticut WAP is actively working to integrate funding opportunities from the Inflation Reduction Act (IRA) into the WAP program and coordinate with BIL funds. The whole homes energy rebates (HOMES) and the High-Efficiency Electric Homes Rebate programs will be especially useful programs for Connecticut WAP. The IRA provides opportunities to reduce costs for contractors and increase economic development in clean energy adoption in low-income households.

V.7 Health and Safety

Connecticut WAP has implemented policies and procedures to address health and safety considerations. These are included in the CT WAP Operations Manual: Sec. 400 Health and Safety (QWP 2022) (WPN 227).

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

As federal and state policy is implemented, Connecticut WAP will respond as needed to remain in compliance with all authorities governing WAP service delivery, the current T&TA budgets have been reviewed and allowances have been made for Health and Safety training specific to this demand and will be tracked accordingly.

V.8 Program Management

V.8.1 Overview and Organization

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

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

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

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

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

V.8.2 Administrative Expenditure Limits

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

V.8.3 Monitoring Activities

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

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

Note: All Monitoring activities will be conducted in compliance with DOE Guidance and the Connecticut Weatherization Assistance Program Quality Work Plan (2022) requirements, Connecticut Weatherization Assistance Program Weatherization Field Guide Standard Work Specifications Aligned Edition (083021), and the current year State Plan/Master File. (For further information refer to the 2022 CT WAP Operations Manual sections 300, 400, 500, 600, and 700).

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

Programmatic and Management Monitoring

- The CT WAP Operations Manual (2022) Sections 300, 400, 500, 600, and 800 and the CT WAP SWS-aligned Field Guide (2022);
- WPN: 224;

Subgrantee Monitoring

- The CT WAP Operations Manual (2022) Sections 100, 300, 400, 500, 600, and 700 and the CT WAP SWS-aligned Field Guide (2022); and
- CT WAP utilizes WPN 204, 224, and attachment 1 updated Checklists and Operations Manual content specific Subgrantee monitoring activities.

Note: Connecticut WAP will perform comprehensive onsite monitoring statewide on an annual basis. Records reviews at the subgrantee's office may involve multiple visits.

In alignment with WPN 20-4 and 22-4, more frequent monitoring (quarterly or semi-annual) will be conducted at Subgrantees that have been identified as having significant deficiencies. In addition, more frequent monitoring of in-process units will be conducted by the Grantee (at least 20% of units in process will be monitored). These monitoring events will be tracked in a spreadsheet until a state database is developed.

The individual onsite monitoring activities are structured as follows:

- Comprehensive Administrative/ Fiscal Monitoring (annual)
- 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, QWP22 standards compliance warrant additional activities to ensure the best outcomes. Actual program year totals may be adjusted to DOE minimum levels if midyear assessments indicate consistent acceptable performance at any Subgrantee.

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

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Connecticut WAP anticipates that Subgrantees will utilize components of the DOE prescribed standard options to conduct Quality Control Inspections as defined in WPN 224.

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:

Technical Consultants

Desk Monitor (1 Position): will focus on technical writing and providing technical support

Funding Source: 100% Grantee T&TA (to include travel and expenses)

Field Monitor (3 positions): will serve as Quality Control Inspector/Technical Compliance Monitor and will provide technical support. At least one (1) field monitor will focus work on multifamily projects

Funding Source: 100% Grantee T&TA (to include travel and expenses)

Weatherization State Team Members and their responsibilities for monitoring:

*All State team member compensation derived from the federal Administration budget

Position	Research Analyst
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	Program, operations and policy support
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

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

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

Position	Associate Research Analyst
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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	Research Analyst Supervisor (New)
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	Grant Administration, Grantee staff supervision
Compensation	State and Federal funding
Travel/Training Funding	100% Federal Funding

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

Position	Grants and Contracts Specialist (New)
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	Contracting; Grants administration
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

Position	Research Analyst
Office	Office of Affordable Housing Energy Retrofits
Responsibilities	Technical support
Compensation	State Funding
Travel/Training Funding	100% Federal funding

Position	Director
Office	Affordable Housing Energy Retrofits
Responsibilities	Programs, operations, fiscal and technical direction
Compensation	State Funding
Travel/Training Funding	100% Federal funding

Annual Administrative/Fiscal Monitoring is performed via a team approach made up of Technical and Fiscal Monitoring personnel utilizing the DOE WAP Onsite Monitoring Field/Subgrantee Checklist as well as instruments prepared specifically for use in Connecticut. Technical monitor(s) possess BPI EA/QCI/MFBAI certifications.

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

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

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

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

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

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

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

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

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

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

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

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

- CT WAP Audit Checklist;
- CT WAP Installer Checklist;
- CT WAP BWR Review form;
- CT Field Monitoring Tool for Field and On-Site Field Review CT WAP Field Visit Form; and
- DOE WPN 204 and 224.

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

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

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

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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 of all remaining funds if found to be consistently noncompliant with Federal and State requirements. Such findings may include, but are not limited to:

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

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

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

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

V.8.4 Training and Technical Assistance Approach and Activities

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

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

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

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

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

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

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

Connecticut WAP Recognizes DOE WPN 224 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

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worker is employed. Connecticut WAP will work to address equity and diversity issues in clean energy industries by adhering to the Justice40 Initiative in the implementation of workforce training efforts, including outreach and promotion. Recruitment efforts will prioritize individuals from historically under-represented communities and partnerships with minority owned or led businesses, organizations, and groups. There will also be outreach conducted through community colleges, technical schools, and high schools to capitalize on strengthening the trades workforce, especially in areas that align with the Justice40 criteria.

Connecticut WAP continuously utilizes feedback from DOE visits and monthly calls, subgrantee monitoring visits and weekly calls, frequent calls with NASCSP, and semi-annual subgrantee performance reviews to improve program delivery and efficiency. For example:

- Weekly calls with the subgrantee network revealed the need for a template for monthly SHPO data recording, which was created and provided to them.
- Conversations with NASCSP led CT WAP to target large multifamily projects with BIL funding given the substandard performance of the single family program, historically.
- DOE monitoring visits revealed a number of flaws with the auditing process, specifically the recording of data into NEAT properly. Training was completed to correct the issue which has lead to more accurate audits.

Connecticut WAP will work closely with our selected subgrantee, DOE, and our contracted training center to ensure that we are implementing feedback into program design to create and maintain the best program possible.

Training for BIL

To successfully implement the BIL funding, Connecticut WAP recognizes the need to train at levels of the Program, to include the Grantee, Subgrantee(s), and the subcontractor network. Connecticut WAP plans to utilize the initial 12-18 months of the grant cycle to recruit and train new staff across the entire network. During the initial phase of the grant, Connecticut WAP will issue a Request for Proposals for subgrantees as well as for technical monitors (QCI-certified). Connecticut WAP will work with the selected subgrantee(s) to recruit and train approximately six (6) support staff to assist with program implementation. Also, whether crew or contractor based, there will be a need for Retrofit Installers, Crew Leads, Energy Auditors, QCI's, and other trade professionals (HVAC, electrician, etc.). To ensure statewide coverage, Connecticut WAP estimates the following number of trained workers for each role:

- 25 Retrofit Installers and Crew Leads
- 6 Energy Auditors
- 6 Quality Control Inspectors
- 8 Trade Professionals (HVAC, electrician, etc.)

At the Grantee level, Connecticut WAP is undertaking the requisite approval processes to hire up to four (4) additional staff:

- Research Analyst Supervisor
- State and Federal funded
- To serve as overall grant manager with supervisory responsibilities for programmatic, technical, and financial staff
- Grants and Contracts Specialist
- State and Federal funded
- To assist with contract writing and routing as well as general grant administration
- Research Analyst
- State and Federal funded
- To serve as a policy analyst/coordinator
- Research Analyst
- State and Federal funded
- To provide program support and coordinate outreach and training

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Connecticut WAP may use BIL T&TA funds to procure and maintain a data management software to increase program efficiency.

A list of Comprehensive and Specific trainings is included in the BIL Planning Workbook.

BIL-specific workforce training will target individuals from historically under-represented communities in the clean-energy industry, as detailed previously.

RTT Pilot

New and specific to the WAP BIL grant cycle is a Renewable Thermal Technology (RTT) pilot program. Connecticut WAP intends to dedicate up to \$500,000 of T&TA funding and will explore resources to buy down the cost of measures that facilitate the installation of RTT systems, specifically heat pump technologies, their integrated HVAC controls, and other ancillary measures such as electric service upgrades. This funding may be braided with available funding from the IRA. Connecticut WAP, in coordination with our selected subgrantee(s), shall identify a finite number of properties that would be considered ideal candidates for RTT. Ideal properties utilize electric resistance or delivered-fuels (e.g. oil or propane) for space heating. Ideal properties also contain near end-of-life legacy energy systems that are due for replacement. Connecticut WAP believes we can demonstrate the cost-effectiveness of RTT with heat pump pilot properties because of the substantial amount of energy and cost savings projected to be realized from replacing failing legacy systems operating on inefficient fuel sources with high performing energy technologies such as heat pumps. All types of heat pumps (air source, ground source, etc.) will be considered for this pilot and Connecticut WAP will work with DOE to determine the best technology to utilize for this pilot.

The heat pump pilot program will also address communities experiencing heat vulnerabilities within the State by providing cooling. Heat pumps installed for cooling will target heat-vulnerable areas, which are mostly located in urban centers within the State. To offset the operational costs associated with electrifying housing heating sources, Connecticut is currently defining the parameters of a low-income discount rate (LIDR), pursuant to Section 112 of Public Act 11-80, for low-income electric customers, which will help alleviate any impact related to increased electric bills related to heating load. Additionally, Connecticut WAP will leverage available rebates, incentives and tax credits of the HOMES and High-Efficiency Electric Homes Programs under the IRA to implement the heat pump pilot program. Connecticut WAP will adhere to the Justice40 Initiative for implementation of the RTT pilot.

Connecticut WAP will be selecting a subgrantee(s) for BIL through an RFP process to be run in the first 2 quarters of 2023. Once selected, the subgrantee(s) will issue an RFP of their own to procure for HVAC contractors who are willing and able to take on the RTT pilot project. The selection of a contractor(s) for this project should occur during Q3 of 2023. The subgrantee(s) and contractor(s) will work together to identify sites which are best suited for an RTT installation, targeted for 2024. Installations are estimated to occur in 2024 and 2025, with M&V activities to follow.

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

Percent of overall trainings

Comprehensive Trainings:	70.0
Specific Trainings:	30.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	30.0
Percent of budget allocated to Crew/Installer trainings:	60.0
Percent of budget allocated to Management/Financial trainings:	10.0

V.9 Energy Crisis and Disaster Plan

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

The Framework describes actions to be taken and general responses to disasters that have risen to statewide action. The Framework does not identify WAP as a resource for crisis or disaster response.

The State acknowledges that the use of WAP funds during a disaster is limited, as outlined in WPN 127.

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

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30). WAP eligible households will receive priority service delivery to conduct comprehensive site-specific health, safety, and energy efficiency assessments and initiate heating system diagnostics and repair or replacement proposals. Connecticut WAP Subgrantees will ensure that appropriate actions are taken to address heating-related responses in a timely manner and deliver high quality comprehensive weatherization to all sites receiving emergency heating services.

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

Allowable expenditures are limited to measures as defined in:

- 10 C.F.R. § 440.16 (b);
- 10 C.F.R. § 440.18 (D) (15);
- DOE WPN 227; and
- The Current CT WAP State Plan/Master File.

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

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

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

Connecticut WAP will also provide long-term (90180 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.