

**V.1 Eligibility****V.1.1 Approach to Determining Client Eligibility*****Provide a description of the definition of income used to determine eligibility***

Per WPN 21-3, in which the Colorado Energy Office Weatherization Assistance Program (CEO WAP) will comply with for PY21-22 when determining client eligibility, income is defined as the gross income (all cash receipts) at or below 60% of the State Median Income to align eligibility with Colorado Department of Human Services LEAP [LIHEAP] eligibility. 60% SMI will be used to determine eligibility for households up to 7 residents per household. Households with 8 or more residents will be qualified using 200% Federal Poverty Level. Please see the chart below.

Gross income is calculated before taxes, insurance, etc. are deducted from the cash receipts. When Social Security is included in income, the gross income must be calculated before Medicare deductions. In the event that a legal dissolution of a family unit occurs, an individual may use his or her sole income since the dissolution, annualized, to determine eligibility in accordance with the 200% of the Federal Poverty Guidelines. Application eligibility expires 12 months from certification date if work on the dwelling unit (energy audit) has not been initiated.

<b>HH Size</b>	<b>200% FPL (DOE)</b>	<b>60% SMI (LEAP)</b>	<b>Difference</b>	<b>% Difference</b>
1	\$25,760	\$31,428	\$5,668	22.00%
2	\$34,840	\$41,100	\$6,260	17.97%
3	\$43,920	\$50,772	\$6,852	15.60%
4	\$53,000	\$60,456	\$7,456	14.07%
5	\$62,080	\$70,128	\$8,048	12.96%
6	\$71,160	\$79,800	\$8,640	12.14%
7	\$80,240	\$81,612	\$1,372	1.71%
8	\$89,320	\$83,424	-\$5,896	-6.60%
Additional/person	\$9,080.00	\$1,812.00	N/A	N/A

***Describe what household eligibility basis will be used in the Program***

To be eligible for CEO WAP services, clients must meet the income criteria outlined in 10 CFR 440.22, or meet a minimum of one of the following three criteria as outlined in WPN 21-3:

1. Have a gross household income (total annual cash receipts) at or below 60% State Median Income up to a 7 person household, or
2. 200% of the federal poverty level for households with 8 or more residents, or
3. Receive cash assistance payments under Title IV or Title XVI of the Social Security Act, or in accordance with applicable State or local law, at any time during the past five years preceding the determination of eligibility. Acceptable programs include:
  - a) Temporary Assistance for Needy Families (TANF)
  - b) Aid to the Needy and Disabled (AND)
  - c) Supplemental Security Income (SSI)
  - d) Low-Income Home Energy Assistance Program (LEAP)

- e) Supplemental Nutrition Assistance Program (SNAP)
- 4. Currently enrolled for assistance under the Low Income Energy Assistance Act of 1981, provided that such a basis is at least 60% of the State Median Income as determined with the criteria established by the Director of the Office of Management and Budget.

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

The process for ensuring that qualified aliens are eligible for weatherization benefits is:

1. Completion of a Lawful Presence Affidavit, signed by the applicant. In the event that there is no lawfully present adult, but there is a lawfully present individual under the age of 18, proof of lawful presence is not required, however confirmation of lawful presence must be in writing and noted in the client file.
2. The Lawful Presence Affidavit must include a copy of a current picture identification of the applicant. Acceptable forms of identification include:
  - a) A valid Colorado driver's license or a valid Colorado identification card
  - b) A valid United States military card/Common Access Card
  - c) A valid United States Coast Guard Merchant Mariner card
  - d) A Native American tribal document
  - e) A valid United States passport
  - f) If an applicant cannot provide one of the aforementioned documents, he or she must provide one of the forms of identification set forth in §24-76.5-103(4)(a) C.R.S. or in 1 CCR 204-30 Rule 5 from the Executive Director of the Colorado Department of Revenue.
3. If the applicant checks the "I am lawfully present in the United State pursuant to Federal Law" box, residency status is verified through the Systematic Alien Verification for Entitlements (SAVE) by CEO WAP staff. Acceptable forms of identification for a SAVE verification are:
  - a) Colorado license (expired less than 10 years, image on file)
  - b) Colorado ID card (expired less than 10 years, image on file)
  - c) US passport (expired less than 10 years, image on file)
  - d) Out of State ID from LP state (expired less than one year)
  - e) Foreign passport w/photo, US Visa, I-94
  - f) Valid Military ID/Common Access Card
  - g) Certificate of Naturalization with photo less than 20 years old
  - h) Valid I-551
  - i) Valid EAD/ Temporary Resident
  - j) Refugee/Asylee I-94 w/photo less than 20 years old
  - k) Social Security Card verified by SSOLV
  - l) U.S. birth certificate
  - m) Certificate of Citizenship from the Department of Interior
  - n) U.S. adoption order with birth information
  - o) BIA ID Care with photo less than 10 years expired
  - p) VA card with photo less than 20 years old
  - q) Parent/Guardian affidavit if under 21 years old
  - r) Colorado Department of Corrections or Federal Bureau of Prisons ID card

**V.1.2 Approach to Determining Building Eligibility**

***Procedures to determine that units weatherized have eligibility documentation.***

All clients receiving services under the CEO WAP must first have their eligibility verified as outlined in V.1.1 of the State Plan by the Local Administrative Subgrantee and client eligibility must be documented in the client file. Single family, manufactured housing, and multifamily buildings are eligible building types for weatherization in the State of Colorado.

A subgrantee may weatherize a building containing rental dwelling units using financial assistance for dwelling units eligible for weatherization assistance if:

1. The subgrantee has obtained the written permission of the owner or his or her agent, and
  - a) No fewer than 66% (50% for duplexes and four-unit buildings, and certain eligible types of large multifamily buildings) of the dwelling units in the building
    - (1) Are eligible dwelling units, or
    - (2) Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building.
2. The U.S. Department of Housing and Urban Development has qualified the dwelling unit, as requested by the CEO WAP. Per WPN 17-4, in order to ensure that a multifamily building meets the income eligibility requirements set by DOE pursuant to the certification process established by HUD, property owners and managers shall submit two documents to HUD:
  - a) Property Self-Certification form that specifies that the building in question meets DOE's income eligibility requirements and,
  - b) Property Occupancy Report from current property records that confirm compliance with DOE's income eligibility requirements.

Per 10 CFR 440.22(3)(c), subgrantees are required to establish procedures for dwellings which consist of a rental unit or rental units to ensure that

- a) The benefits of weatherization assistance associated with such rental units, including units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units,
- b) For a reasonable period after weatherization work has been completed on a dwelling containing a unit occupied by an eligible household, the tenants in that unit (including households paying for their energy through their rent) will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed
- c) The enforcement is provided through procedures established by the State by which tenants may file complaints, and owners, in response to such complaints, shall demonstrate that the rent increase concerned is related to matters other than the weatherization work performed
- d) Subgrantees are expected to receive tenant complaints regarding rent increases and should refer them to organizations (legal aide, tenant landlord mediation organizations, etc.) which can offer assistance in resolving the complaint
- e) No undue or excessive enhancement shall occur to the value of the dwelling units

In order to secure the Federal Investment made under this part and address the issues of eviction from and sale of property receiving weatherization materials under this part, the CEO WAP may seek landlord agreements to placement of a lien or to other contractual restrictions. For buildings identified in the State Plan, the CEO WAP will continue to be responsible for ensuring compliance with the remaining requirements of this section, and the CEO WAP has established requirements and procedures to ensure such compliance in accordance with this section.

Per 10 CFR 440.22(d), as a condition of having assistance provided under this part with respect to multifamily buildings, the CEO WAP will require financial participation, when feasible, from the owners of such buildings. Such financial participation shall not be reported as program income; nor will it be treated as if it were appropriated funds. The funds contributed by the landlord shall be expended in the multifamily building being weatherized, in accordance with the agreement between the landlord and the weatherization subgrantee.

Per 10 CFR 440.22(f), the CEO WAP allows for the weatherization of shelters. For the purpose of determining how many dwelling units exist in a shelter, each 800 square feet of the shelter or each floor of the shelter may be classified as a dwelling unit. The CEO WAP exercises caution in dealing with non-traditional dwelling units such as shelters, apartments over businesses, etc. to ensure they meet Program regulations on whether the unit is, in fact, eligible. Weatherizing these types of units is discussed with and approved by, the DOE Project Officer prior to weatherization. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicants is not allowed. The use of a post office box for non-stationary campers or trailers does not meet this requirement.

Partial Weatherization of units is not permitted.

#### **STATE HISTORICAL PRESERVATION PROCESS**

Per WPN 10-2, the requirements for the weatherization of historic properties within the State of Colorado are located within the Prototype Programmatic Agreement between the DOE, CEO and Colorado State Historic Preservation Office (SHPO) dated July 2011 and amended July 2012. The undertakings covered under this Preservation Act are primarily smaller scale activities and routine projects, without the potential for adversely affecting historic properties, rather than complex undertakings with a greater potential to adversely affect historic properties, which would require completion of the typical Section 106 review process. All undertakings will be done in accordance with applicable local building codes or the International Building Code, where applicable.

#### **QUALIFIED PROFESSIONALS**

Subgrantees are required to use qualified professionals in conducting its Section 106 requirements. For the purposes of this Programmatic Agreement (PA), the term “qualified professionals” means an individual or group of individuals who:

1. Meet the Secretary of Interior Professional Qualification Standards for Archeology and Historic Preservation,
2. Have at least a total of one year full time prior experience in, or primary responsibility for, Section 106 reviews or state/local historic preservation reviews,
3. Are currently employed by, or have worked in historic preservation matters, for a designated certified local government,
4. Have completed a formal training in the Section 106 review process conducted by the Advisory Council on Historic Preservation (ACHP), SHPO, or DOE: or
5. Are listed as a historic preservation consultant or contract resource on the Directory of Cultural Resource Management Agencies, Consultants and Personnel for Colorado.

Subgrantees may decide to utilize qualified professionals in the manner that is most appropriate given the scope and nature of their particular program and projects, including hiring qualified professionals on a full-time, part-time, project specific, employee or contractual basis.

## **NON-EXEMPT PROJECTS**

When a measure or unit does not fall within the agreed upon exempt undertakings, the following process will be used:

1. The CEO WAP and/or the subgrantee will retain qualified professionals to act as its primary point of contact for Section 106 historic preservation matters and to assist the CEO WAP or subgrantee in implementing their responsibilities under the PA throughout the Section 106 process (including, without limitation, initiating consultations, evaluating a property against the criteria of eligibility for the National Register, or evaluating the applicability of PA exemptions to particular projects).
2. [If a qualified professional requires assistance in making a determination of eligibility of a property for inclusion on the National Register, then the qualified professional may submit a photograph of the property involved by email to oaahp.isu@state.co.us in order to receive the SHPO's preliminary opinion on whether or not the property may be eligible for inclusion in the National Register \(only a qualified professional may utilize this email process to gain SHPO's preliminary opinion on eligibility\).](mailto:oaahp.isu@state.co.us)
3. [The qualified professional will also contact SHPO by telephone at 303-866-2673 to inform SHPO that an email has been forwarded. SHPO will respond within ten business days of the email or telephone call, whichever is later, to the qualified professional. If SHPO responds that the property does not have the potential to be eligible, subgrantees or their contractors may proceed with the project without additional consultation. If SHPO responds that the property may have the potential to be eligible, the subgrantee will follow the procedures to reach a final determination of eligibility.](tel:303-866-2673)

## **RECORDS**

Records are to be maintained for a period of six years from the project completion and be made available for review if requested by the DOE or the ACHP.

## **FILE DOCUMENTATION**

For all homes 50 years or older, file documentation must include a form that states only exempt measures were completed for that unit.

## **REPORTS**

Subgrantees are required to submit to the CEO WAP an annual report due June 30<sup>th</sup> of each program year which is to include the following information:

1. Brief summary of undertakings (nonexempt projects if applicable),
2. Number of non-exempt undertakings,
3. Number of exempt undertakings and,
4. Any reviews conducted by the SHPO.

The CEO WAP will then submit this information to the DOE, ACHP (Advisory Council on Historic Preservation) and NCSHPO (National Conference of State Historical Preservation Officers) in an annual report.

## **WAP UNDERTAKINGS EXEMPT FROM SECTION 106 REVIEW**

In accordance with 36 CFR 800.3(a)(1), the following undertakings have been determined to have no potential to cause effects on historic properties:

### **1. EXTERIOR WORK ON BUILDINGS OR STRUCTURES**

- a) Air sealing of the building shell, including caulking, weather-stripping, and other air infiltration control measures on windows and doors and installing thresholds in a manner that does not harm or obscure historic windows or trim.
- b) Thermal insulation in walls, floors, ceilings, attics, and foundations in a manner that does not harm or damage historic fabric.
- c) Blown in wall insulation where no holes are drilled through exterior siding, or where holes have no permanent visible alteration to the structure.
- d) Removable film on windows (if the film is transparent, solar screens, or window louvers, in a manner that does not harm or obscure historic windows or trim.
- e) Reflective roof coating in a manner that closely resembles the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline, or where not on a primary roof elevation or visible from the public right-of-way.
- f) Storm windows or doors, and wood screen doors in a manner that does not harm or obscure historic windows or trim.
- g) In-kind replacement or repair of primary windows, doors and door frames that closely resemble existing substrate and framing on buildings and structures built after 1950.
- h) Repair of minor roof and wall leaks prior to insulating attics or walls, provided repairs closely resemble existing surface composite.
- i) Interior spaces where the work will not be visible from the public right of way: no structural alterations are made, no demolition of walls, ceilings or floors occurs: no drop ceilings are added: or no walls are leveled with furring or moved, should be automatically excluded from SHPO review.

## **2. INTERIOR WORK UNDERTAKINGS**

- a) Energy efficiency work within the building shell:
- b) Thermal insulation in floors, ceilings, attics, crawl spaces, ducts and foundations, wall insulation for buildings and structures built after 1950: and, for buildings and structures built in 1950 or before, wall insulation if performed by a contractor with experience with historic buildings in order to ensure there are no gaps in which condensation may form.
- c) Blown in wall insulation where no decorative plaster is damaged for buildings and structures built after 1950: for buildings and structures built in 1950 or before, if performed by a contractor with experience with historic buildings in order to ensure there are no gaps in which condensation may form.
- d) Plumbing work, including installation of water heaters.
- e) Electrical work, including improving lamp efficiency.
- f) Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.
- g) Repair or replace water heaters.
- h) Adding adjustable speed drives such as fans on air handling units, cooling tower fans, and pumps.
- i) Install insulation on water heater tanks and water heating pipes
- j) Installation of solar water heating systems provided the structure is not visible from the public right of way.
- k) Install waste heat recovery devices, including desuperheater water heaters, condensing heat exchangers, heat pump and water heating heat recovery systems, and other energy recovery equipment.
- l) Repair or replace electric motors and motor controls like variable speed drives.

- m) Incorporate other lighting technologies such as dimmable ballasts, day lighting controls, and occupant controlled dimming.

### **3. WORK ON HEATING AND COOLING SYSTEMS**

- a) Clean, tune, repair or replace heating systems, including furnaces, oilers, heat pumps, vented space heaters, and wood stoves.
- b) Clean, tune repair or replace cooling systems, including central air conditioners, window air conditioners, heat pumps, and evaporative coolers.
- c) Install insulation on ducts and heating pipes.
- d) Conduct other efficiency improvements on heating and cooling systems, including replacing standing pilot lights with electronic ignition devices and installing vent dampers.
- e) Modify duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems.
- f) Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems.

### **4. ENERGY EFFICIENCY WORK AFFECTING THE ELECTRIC BASE LOAD OF THE PROPERTY**

- a) Convert incandescent lighting to fluorescent.
- b) Add reflectors, LED exit signs, efficient HID fixtures, and occupancy (motion) sensors.
- c) Replace refrigerators.

### **5. HEALTH AND SAFETY MEASURES**

- a) Installing fire, smoke or carbon monoxide alarms.
- b) Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside.
- c) Install mechanical ventilation in a manner not visible from the public right of way.

### **6. ADDITIONAL MISCELLANEOUS EXEMPT ACTIVITIES**

- a) Replacement or installation of new storm windows where the finish on the new storm windows matches the finish of the existing windows in color.
- b) Replacement of interior doors that meet incidental repair expenditure criteria where the size of the openings is not altered. If the interior door replacements exceed the incidental repair expenditure criteria, replacements will not be performed with DOE or leveraged funding.
- c) Replacement or repair of door knobs and other door hardware.
- d) Installation of furnace outdoor termination plates.
- e) Installation of exterior furnace vents and caps

<b>V.1.2 box 2 Describe Re-weatherization compliance</b>
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Per 10 CFR 440.18, Dwelling units are eligible for re-weatherization if:

1. A dwelling unit has been weatherized, it may be re-weatherized if it has been damaged by fire, flood, or force majeure and the repair of the weatherization materials is not covered by insurance.
2. Dwelling units partially weatherized under this program or under other Federal programs during the period of September 30, 1975 through a rolling date of 15 years and 1 month from the current date may receive further financial assistance for weatherization under this program provided that:
  - a) The occupant reapplies for assistance under the program and is certified to be eligible,

- b) The local subgrantee prioritizes the application with all others adhering to program priorities, and
- c) A new energy audit is performed which considers all previous energy conservation improvements to the dwelling.

**V.1.2 box 3 Describe what structures are eligible for weatherization**

Structures eligible for weatherization include: site-built homes, manufactured homes, rentals, duplexes, triplexes, four-plexes, shelters, and multifamily units (five or more units) which meet the requirements of 10 CFR 440.22. For determining how many dwelling units exist in a shelter, each 800 square feet of the shelter or each floor of the shelter may be classified as a dwelling unit. The CEO WAP exercises caution in dealing with non-traditional dwelling units such as shelters, apartments over businesses, etc. to ensure they meet Program regulations on whether the unit is, in fact, eligible. Weatherizing these types of units is discussed with and approved by the DOE Project Officer prior to weatherization. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicants is not allowed. The use of a post office box for non-stationary campers or trailers does not meet this requirement.

**V.1.2. box 4 Describe how Rental Units/Multifamily Buildings will be addressed**

Structures eligible for weatherization include: site-built homes, manufactured homes, duplexes, triplexes, four-plexes, shelters, and multifamily units (five or more units) which meet the requirements of 10 CFR 440.22. For determining how many dwelling units exist in a shelter, each 800 square feet of the shelter or each floor of the shelter may be classified as a dwelling unit. The CEO WAP exercises caution in dealing with non-traditional dwelling units such as shelters, apartments over businesses, etc. to ensure they meet Program regulations on whether the unit is, in fact, eligible. Weatherizing these types of units is discussed with, and, approved by, the DOE Project Officer prior to weatherization. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicants is not allowed. The use of a post office box for non-stationary campers or trailers does not meet this requirement.

Per 10 CFR 440.22 and WPN 11-9, a subgrantee may weatherize a building containing rental dwelling units, provided that:

1. The subgrantee has obtained the written permission of the owner, landlord, or a duly authorized agent to perform the installation of all weatherization materials and provide energy saving services
2. That no fewer than:
  - a) 66% of the dwelling units in the building are eligible dwelling units or will become eligible dwelling units within 180 days under either a Federal, State, or Local Government program for rehabilitating the building, or making similar improvements
  - b) 50% of dwelling units in either duplexes and four unit buildings are eligible dwelling units or will become eligible dwelling units within 180 days under either a Federal, State, or Local Government program for rehabilitating the building, or making similar improvements
  - c) The U.S. Department of Housing and Urban Development has qualified the dwelling unit, as requested by the CEO WAP. Per WPN 17-4, in order to ensure that a multifamily building meets the income eligibility requirements set by DOE pursuant to the certification process established by HUD, property owners and managers shall submit two documents to HUD:
    - i) Property Self-Certification form that specifies that the building in question meets DOE's income eligibility requirements and,



- ii) Property Occupancy Report from current property records that confirm compliance with DOE's income eligibility requirements.
3. That the subgrantee has ensured that:
    - a) The benefits of weatherization assistance, including instances in which tenants pay for their energy through rent, will accrue primarily to the low-income tenants residing in such units.
    - b) The landlord, owner, or authorized agent has signed a document agreeing that rent will not be increased for a reasonable amount of time following weatherization improvements unless rent increases can be demonstrably proven to be related to matters other than the weatherization work performed.
  4. Subgrantees are expected to receive tenant complaints regarding rent increases and should refer them to organizations (legal aide, tenant-landlord mediation organizations, etc.) which can offer assistance in resolving this issue. CEO WAP will not intervene or render a decision on tenant complaints involving landlord rent increases.

As a condition of serving multifamily buildings, the CEO WAP will require financial participation, when feasible, from the owners of such buildings. Such financial participation shall not be reported as program income, nor will it be treated as if it were appropriated funds. The funds contributed by the landlord shall be expended in accordance with the agreement between the landlord and the weatherization subgrantee. Landlord financial participation for heating system and refrigerator replacements is mandatory in multifamily buildings, unless the landlord can prove financial plight per CEO WAP policy.

Partial Weatherization of units is not allowed.

**V.1.2 box 5 Describe the Deferral Process**

The following Deferral Process was developed by CEO WAP to assist subgrantee field staff in determining which situations are "beyond the scope" of the weatherization program and thus represent a unit that should not be served until the conditions change. Generally speaking, situations which constitute a threat to the health and safety of the subgrantees' staff should be avoided until such time as the conditions are remedied.

Situations which constitute a threat to the health and safety of subgrantee staff and/or WAP clients should be avoided until the unsafe conditions are remedied. Subgrantee staff who choose to work on a unit that could or should be a deferral, do so at their own risk; however, putting occupants at further risk as a result of doing the work is never allowable. The CEO WAP does not require, expect, or encourage subgrantee crews to work in unsafe or unhealthy conditions. Subgrantees who wish to classify a unit as a deferral must include an audit form that includes the following information related to the deferral:

1. Date(s) of the audit/assessment.
2. A description of the issues that caused the deferral.
3. A description of the conditions under which WAP work could continue.
4. A clear description of the responsibilities of all parties involved.
5. Client's signature indicating that they have been informed of their rights/ options and that they understand the issues and their responsibilities.
6. Date the client was informed of the deferral.

All subgrantees are required to have a written deferral procedure that records pertinent information such as client information, job number, stated problem, root cause of the situation, and potential resolution. Any substantiating evidence, such as photos, staff written comments, defective materials, additional costs, etc., should be included.

## **APPEAL PROCESS**

The following process should be used should a client request an appeal or second opinion on a deferral:

1. Client should submit a written appeal to the direct supervisor of the subgrantee staff member who determined the unit should be deferred.
2. If the deferral is upheld by the direct supervisor, the client may submit a written appeal to the CEO WAP Manager.
3. If the deferral is upheld by CEO WAP Manager, the client may submit a written appeal to the CEO WAP Director.
4. The decision rendered by the CEO WAP Director is considered final and no further appeals are allowed.

If at any point in this process, the original deferral is either not upheld or the conditions that caused the initial deferral are mediated, the subgrantee is required to return to the unit and complete all work.

## **DEFERRAL CONDITIONS**

1. Client/ Access Issues:
  - a. The client, or other household member, has known health conditions that prohibit the installation of insulation materials or other weatherization materials.
  - b. The client is uncooperative, abusive, hostile, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the home or who, based upon the judgment of the senior staff person in the field, makes the working conditions intolerable for workers.
  - c. Client cannot be reached at telephone number on file due to the service being disconnected or due to client unavailability. Follow up mail goes unanswered.
  - d. Client refuses to allow energy auditor(s) access to all areas of the home necessary to conduct the comprehensive energy audit.
  - e. Presence of animals which pose a risk to the weatherization workers. The work may be deferred until such animal threats have been secured adequately so that they no longer pose a threat.
  - f. Unable to gain access to the area to perform the work. The work may be deferred until the blocked access is cleared to allow the necessary access to perform the work.
  - g. Illegal activity.
2. Human Health Issues:
  - a. The house has raw sewage, excessive animal feces, or other sanitation problems that would further endanger the client and weatherization crews if the weatherization work were performed.
  - b. The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local, county, or state building officials or utilities due to safety or code issues.
  - c. Dangerous conditions exist due to high carbon monoxide levels associated with combustion appliances which cannot be resolved under existing health and safety measures and guidance.
  - d. The extent and condition of lead-based paint in the house would potentially create increased health and safety hazards for both the occupants and crew members.

- e. Volatile organic compounds (VOC's) and other chemicals on the premises are poorly stored which represent a health risk (via breathing or skin contact) to the workers or client's safety.
  - f. In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the identified condition is satisfactorily corrected.
3. Combustion Appliance Issues:
- a. Open combustion heating systems situated in a bedroom, bathroom or closet that cannot be replaced under the CEO WAP guidelines. This includes all rooms that are used or designed to be used as a bedroom or any enclosed space that has access only through such a room.
  - b. Combustion systems that are operating in an unsafe manner, and cannot be repaired or replaced within the scope of the program.
  - c. Furnaces that have no service access. Examples include attic furnaces with access doors which the crew cannot enter through, furnaces where the client has finished the room around the unit but did not allow enough room to get to the controls and vents. Such situations should be discussed with supervisory staff.
  - d. Mobile homes with non-mobile home type furnaces. This includes all furnaces that are added to the unit.
  - e. Furnaces with no cold air return or hot air delivery system (ductwork). Typically, this type of installation is in the middle of a room with limited ductwork. It is particularly important if it has a delivery or return but not both.
  - f. Any unvented heater. This includes all types of unvented heaters, portable kerosene space heaters or freestanding gas and propane heaters. Work should only be done at the home if the portable heater can be permanently disabled or vented (with client/owner permission).
  - g. Any furnace that is installed in a dangerous manner or cannot be brought to code at a reasonable cost (under \$400 cost to the program). Examples: units installed in an area where it could easily be broken.
4. Structural Issues:
- a. 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 or within the scope of the Weatherization Assistance Program guidance.
  - b. If the house is structurally in a condition that is unsafe or beyond repair (the home needs significant rehabilitation work from another funding source) and presents a risk to the worker or client safety.
  - c. A foundation that is not sound and will not support one or more of the walls.
  - d. A unit that is under renovation or where original construction is incomplete and completion will require more than one sheet of drywall material. There is the possibility of coordinating weatherization with renovation/rehabilitation work underway; this is a judgment call of the subgrantees, considering all relevant factors, (timetable for work being done and likelihood of it occurring; option of waiting until work is done before weatherization, etc.).
  - e. Structurally unsound walls where a substantial part of a wall is unstable and that wall is involved in one or more of the desired energy conservation measures for the home; consult an approved computer audit, a supervisor, or State Staff.
5. Electrical Issues:

- a. Major electrical problems where a major portion of the total electrical system appears to be questionable (consult an “expert”); also, consult an approved computer audit.
  - b. There are major electrical problems and when the cost is included with measures it is not cost effective to repair.
6. Miscellaneous Issues:
- a. Moisture problems that are so severe they cannot be resolved under existing health and safety measures or as incidental minor repairs. This includes standing water in the crawl space or any other source that is beyond the scope of the program to resolve.
  - b. Friable Asbestos or Vermiculite in the home or significant enough in various locations that it precludes performing most of the cost-effective energy conservation work.
  - c. If a mold condition is discovered during the initial audit of the home by an energy auditor and cannot be adequately addressed by the weatherization crew, the unit will be referred to the appropriate public or non-profit subgrantee for remedial action. Subgrantees shall defer work on the home until another funding source or the owner completes mold remediation. Colorado weatherization shall distribute the pamphlet from the U.S. Environmental Protection Subgrantee (EPA), Indoor Environment Division, (IED), “A Brief guide to Mold, Moisture, and Your Home” to clients whose homes have a moisture and/or mold problem. The pamphlet can be found at:  
<https://www.epa.gov/mold/brief-guide-mold-moisture-and-your-home>
  - d. The area is condemned or is slated to be redeveloped (highway development, economic development, flood area).

**REMOVING DEFERRAL STATUS**

The status of deferral from a unit may be removed if the conditions which warranted the deferral are addressed and/or a client’s appeal results in the removal of deferral status.

The client is responsible for remedying the conditions, as specified in the communication that client received from the subgrantee, and contacting the subgrantee once these conditions have been addressed. Once the subgrantee verifies that the conditions have been remedied, they are required to return to the unit and complete all work.

Combustion appliance situations that threaten client safety are of great concern to the WAP. Attempts should be made to remedy the situation, rather than deferring the unit.

**V.1.3 Definition of Children**

Definition of children (below age): 6

**V.1.4 Approach to Tribal Organizations**

In accordance with 10 CFR 400.16(f), CEO WAP requires all subgrantees to provide the same weatherization services to eligible Native American households that eligible non-Native American households receive. Native Americans residing on either the Ute Mountain Ute or Southern Ute reservations are eligible for weatherization services via standard allocation provided to Housing Resources of Western Colorado (HRWC). Assistance to low-income Native American populations and other low income persons is equal in all respects.

**V.2 Selection of Areas to be Served**

Colorado is committed to providing services to eligible households throughout all 64 counties within the state. Currently, the state is divided into five single family regions which are managed by five weatherization subgrantees. In addition, there is one statewide subgrantee that provides service to centrally heated multifamily units in all 64 counties. For PY21-22, the regions are:

Region 2: Southeast Plains - The counties included within this region are: Baca, Bent, Crowley, Custer, Huerfano, Kiowa, Las Animas, Otero, Prowers, and Pueblo.

Region 4: Southwest - The counties included within this region are: Archuleta, Delta, Dolores, Gunnison, Hinsdale, La Plata, Mesa, Montezuma, Montrose, Ouray, San Juan, and San Miguel.

Region 5: High Country - The counties included within this region are: Chaffee, Clear Creek, Eagle, Garfield, Grand, Jackson, Lake, Moffat, Park, Pitkin, Rio Blanco, Routt, and Summit.

Region 7: East Denver Metro Area - The counties included within this region are: Adams and Arapahoe.

Region 8: Front Range, Northeast Plains, and San Luis Valley - The counties included within this service territory are: Alamosa, Boulder, Broomfield, Cheyenne, Conejos, Costilla, Denver, Douglas, El Paso, Elbert, Fremont, Gilpin, Jefferson, Kit Carson, Larimer, Lincoln, Logan, Mineral, Morgan, Phillips, Rio Grande, Saguache, Sedgwick, Teller, Washington, Weld, and Yuma.

Region 11: Multifamily Statewide - The CEO WAP contracts with Energy Outreach Colorado, Efficiency LLC, to provide multifamily weatherization services in all 64 counties in order to best maximize resources.

### **FUNDING ALLOCATIONS**

The CEO WAP funding allocation ensures funding will be fully utilized according to the approved DOE State Plan, that prior contractual funding obligations are able to be met, and that the distribution of remaining available funds are allocated on an equitable basis as much as possible (and in accordance with the requirements of the funding source) across all six program subgrantees.

If additional funding becomes available, additional funds will be allocated in accordance with the priorities listed above.

### **V.3 Priorities for Service Delivery**

As defined in 10 CFR 440.16, Priority is given to identifying and providing weatherization assistance to:

1. Clients that fall into one or more of the other priority categories:
  - a) Elderly persons (aged 60 years and over)
  - b) Persons with disabilities
  - c) Families with children (children below age 6)
2. Households with high energy burden

In addition, subgrantees are required to track and report the number of Native American populations served. The CEO WAP does not require subgrantees to utilize the category of “high residential energy

users” in determining priority due to the wide variation in heating degree days (HDD range of 5,000 to 12,000) that exists within the State.

Subgrantees will be monitored on their provision of service to high priority groups, as approved in the subgrantee’s plan to ensure compliance. Once subgrantee satisfies all prioritization requirements, the subgrantees may develop region-specific service models that promote cost-effective delivery of services due to constraining factors such as weather, geography, or the need to fulfill other contractual obligations, such as serving specific utility customers so long as the prioritization of specific clients as previously identified is achieved. The CEO WAP provides oversight of the subgrantee client selection criteria at monitoring visits to ensure that local procedures are in accordance with DOE and CEO WAP policies. The CEO WAP will report the number of priority clients served by priority type, as well as the number of Native Americans served on a quarterly basis, to the DOE.

#### **V.4 Climatic Conditions**

Climatic conditions within the State of Colorado vary significantly depending on the region of the State. Colorado is somewhat unique in that the climatic conditions range include the semiarid plains of eastern Colorado, to a high alpine mountain climate in the middle and western portions of the state. According to the 2009 International Energy Conservation Code, Colorado had four distinct climate zones, including Mixed Dry (4B), Cold (5B and 6B), and Very Cold (7B). Low-income residences in Colorado encounter a significant heating load in the winter months due to decreased temperatures across the state, especially within the mountain regions. Heating Degree Day (HDD) averages for the 64 counties vary from a low of 4,714 (Fremont County) to a high of 11,656 (Lake County). The more populated areas along the Front Range have HDD ranges from the low 6,000’s to around 7,500. Due to the variance in climatic zones, use of site specific audits is necessary to capture this variety and properly apply measures.

HDD data from weather stations around the State of Colorado is used in the Colorado subgrantee allocation formula. Data is used from 6 weather stations operated at:

Denver: Lat = 39.57 / Long = -104.85, Elevation = 5,882.55  
Colorado Springs: Lat = 38.83 / Long = -104.72, Elevation = 6,201.12  
Pueblo: Lat = 38.29 / Long = -104.52, Elevation = 4,684.06  
Grand Junction: Lat = 39.12 / Long = -108.53, Elevation = 4,839.9  
Eagle: Lat = 39.66 / Long = -106.92, Elevation = 6,497.05  
Leadville: Lat = 39.22 / Long = -106.32, Elevation = 9,927.82

#### **V.5 Type of Weatherization Work to be Done**

##### **V.5.1 Technical Guides and Materials**

All weatherization work completed is consistent with CEO WAP DOE approved energy audits, Appendix A of 10 CFR 440, and WPN 15-4. Per WPN 15-4, the CEO WAP has developed and implemented the Colorado Standard Work Specifications Field Guide (CFG) which provides the benchmarks and standards for home energy upgrades in accordance with the Standard Work Specification (SWS) standards developed by the National Renewable Energy Laboratory (NREL) and the Department of Energy. The CFG does not prescribe specific actions, materials or techniques that must be used by subgrantees or subcontractors in order to achieve energy conservation goals. Instead, the CFG provides subgrantees and subcontractors the minimum set of requirements necessary to achieve the desired energy efficiency outcomes. The CEO WAP has language in subgrantee contracts that outlines the expectations for work quality and instructs subgrantees to include these expectations in any contracts entered into with

contractors and vendors. All subgrantee agreements and vendor contracts contain language which clearly references the SWS specifications for work quality outlined in WPN 15-4, Section 2.

### **V.5.2 Energy Audit Procedures**

#### **Audit Procedures and Dates Most Recently Approved by DOE**

Single-Family: NEAT Conditional Approval 04/20/2020

Manufactured: MHEA Conditional Approval 04/20/2020

Multifamily: Submit small and large multifamily projects for DOE approval on a case-by-case basis 4/20/2020

Photovoltaic Systems: SIRTT 10/09/2015 (NEPA approval 01/19/18)

### **ENERGY AUDIT PROCEDURES**

Energy audits will be performed using the Weatherization Assistant for both site built and manufactured homes. In the event that a home is a combination of a site built or modular home and a manufactured home, subgrantees must contact the CEO to determine which audit tool to use.

Subgrantees must assess for the following three components as a part of the standard audit, they are:

1. Incidental Repair Measures – Per WPN 12-9, Incidental Repair Measures (IRM) are repairs that are necessary for the effective performance or preservation of weatherization materials. IRM(s) require cost justification through the electronic energy audit: however they are not to be included with the cost of an Energy Conservation Measure (ECM). Written justification and photos for the necessity of the repair must be in the client file and the repair must be associated with an ECM identified on the Recommended Measures Report.
  - a) All incidental repairs must be completed according to CFG standards, if applicable. If an Incidental Repair Measure has no associated SWS procedure, subgrantees and subcontractors are required to document the incidental repair measure and install the IRM per CEO WAP policy and field guide.
  - b) If neither a SWS nor CEO WAP policy exists for the installation of the IRM, subgrantees and subcontractors must install the IRM using industry best practices.
2. Energy Conservation Measures - Per WPN 12-9, Energy Conservation Measures are a procedure, including weatherization materials and installation, which are considered or performed for its anticipated energy savings.
  - a) Per WPN 17-7 and Colorado policy and procedures, all measures must be cost tested as energy conservation measures by the energy audit. If they do not rank and meet the criteria for “at-risk” clients, certain equipment replacements such as furnaces and water heaters may be replaced under the Health and Safety category.
  - b) All approved Energy Conservation Measures that achieve a Savings to Investment Ratio (SIR) of 1.0 or greater MUST appear on the Recommended Measures Report.
3. Health and Safety Measures – Per WPN 17-7, Health and Safety measures are those measures that are necessary to maintain the physical wellbeing of both the occupants and/or weatherization workers. The actions must be taken to effectively perform weatherization work or the actions are necessary as a result of the weatherization work. Subgrantees are required to:
  - a) Identify all health/safety deficiencies as a part of the initial audit. These health/safety measures must be identified in the work order and completed prior to beginning the installation of any IRM or ECM.

- b) Document all hazards, concerns, questionable situations, etc. as part of the standard audit. Make sure digital images can be linked back to the job. WPN 17-7 defines the activities allowed as Health & Safety (H&S).

## **HEALTH AND SAFETY**

Per WPN 17-7, allowable energy related H&S actions are those actions necessary to maintain the physical well-being of both the occupants and weatherization workers where Costs are reasonable, and the actions must be taken to effectively perform weatherization work; or the actions are necessary as a result of weatherization work. No H&S measures can be performed in a home unless ECMs are also part of the scope of work.

Subgrantees are required to adhere to the following SWS Health and Safety standards:

1. Subgrantee Responsibility
2. Safe Work Practices
3. Combustion Safety Testing
4. Moisture
5. Electrical
6. Warranty
7. Asbestos
8. Radon
9. Common Health and Safety Practices
10. Incidental Repairs
11. Lead
12. Pests/Unsanitary Conditions

## **BUILDING SHELL/AIR SEALING**

Building Shell/Air Sealing of a unit creates a separation between the interior and exterior environments and slows air flow, which increases energy efficiency through heat loss reduction. In addition, this prevents particulate matter from the outside from entering the unit. Subgrantees and/or subcontractors are required to follow the SWS standards for the following Building Shell/Air Sealing measures that are within the scope of the CEO WAP:

1. Attic Penetrations and Chases
2. Open Stairwells
3. Dropped Ceiling and Soffit
4. Windows and Doors
5. Basement and Crawlspace
6. Attached Garages
7. Ducts

## **INSULATION**

Insulation is building material that slows heat flow to create a separation from interior and exterior environments. This aids in heat retention, which lowers the cost of home energy. Subgrantees and/or subcontractors are required to follow the SWS standards for the following Insulation measures that are within the scope of the CEO WAP:



1. General Requirements
2. Attic Insulation General Preparation
3. Knee Walls
4. Attic Openings
5. Walls
6. Floors
7. Basements and Crawlspace
8. Duct Insulation

### **HVAC**

HVAC is the technology of indoor environmental comfort. Its goal is to provide thermal comfort and acceptable indoor air quality. HVAC system design is a sub discipline of mechanical engineering, based on the principles of thermodynamics, fluid mechanics, and heat transfer. Subgrantees and/or subcontractors are required to follow the SWS standards for the following HVAC measures that are within the scope of the CEO WAP:

1. General Requirements
2. Combustion Safety Requirements
3. Forced Air Furnace Replacements
4. Warranty

### **VENTILATION**

Ventilation is the mechanical system or equipment used to circulate air or to replace stale air with fresh air. Subgrantees and/or subcontractors are required to follow the SWS standards for the following Ventilation measures that are within the scope of the CEO WAP:

1. Ventilation Assessment Requirements
2. ASHRAE 62.2.2016
3. Installation
4. Inspection
5. Client Education
6. Dryer Venting/Ducts
7. Supply
8. Whole Building

### **BASELOAD**

Baseloads are the common appliance related energy costs that are common to units. Subgrantees and/or subcontractors are required to follow the SWS standards for the following Baseload measures that are within the scope of the CEO WAP:

1. Refrigerator
2. Water Heating General Items
3. Water Heater Insulation
4. Water Pipe Insulation
5. Water Heater Replacement
6. Water Use Reduction
7. Lighting

## 8. Rooftop Photovoltaics

### **INSPECTION REQUIREMENTS**

The following Inspection Requirements constitute the minimum standards by which all subgrantees and subcontractors should assess all previously listed policies:

1. Subgrantee Quality Control Inspection
2. Client File Documentation
3. Quality Complaints
4. State Monitoring General Requirements
5. State Monitoring Field Visit Requirements

### **MISCELLANEOUS REQUIREMENTS**

Miscellaneous Requirements are managerial and programmatic requirements that are not necessarily related to the installation of measures. They include: General Program Requirements, State and Technical Waiver requirements, Subgrantee subcontract requirements, and Training and Certification Requirements:

#### Multifamily Requirements

Multifamily specific requirements for individually and centrally heated multifamily units

### **SAVINGS TO INVESTMENT RATIO**

As detailed in 10 CFR 440.21(c), in order to provide cost effective service, all assessed energy efficiency measures must meet the conditions as outlined in 10 CFR 440, Appendix A, and achieve a Savings to Investment Ratio (SIR) of at least 1.0 or greater. All mandatory assessment measures that meet the SIR of 1.0 or greater must be installed by subgrantees or subcontractors.

### **COMMUNICATION OF GUIDELINES AND STANDARDS**

Communication of Colorado SWS Guidelines and Standards, including SWS updates, SWS training plans, SWS implementation schedules, and all other associated training and technical documents is the responsibility of CEO Technical staff. Guidelines and Standards will be communicated via email in the form of an electronic memorandum to each subgrantees Executive Director or Program Manager, with all subgrantee trainers copied on the memorandum. This electronic memorandum will, at a minimum:

1. Identify the approved changes to the CFG
2. Identify the dates the changes will be effective
3. Identify any additional training for the new policies and procedures scheduled by CEO WAP Technical Staff.

CEO WAP staff will require that the Executive Director or Program Manager of each subgrantee sign and return the electronic memorandum to the CEO WAP Technical staff acknowledging receipt of the updated SWS Field Guide. It is the responsibility of the Executive Director/Program Manager and/or Trainers to distribute the updated CFG sections to their respective subgrantee personnel and crews. In the event that subcontractors are hired by the subgrantees to perform weatherization work, subgrantees are responsible for providing subcontractors with the CFG and to ensure that all work performed by subcontractors meets the specifications and standards identified within the CFG. A sample of

subcontractor contracts will be reviewed during the Administrative Monitoring to ensure subgrantee compliance with this requirement.

In addition to the electronic memorandum, CEO WAP staff will update the controlled copy of the CFG that exists on the CEO WAP online database within 10 business days of issuing the electronic memorandum. This is done so that all subgrantees and subcontractors may reference the most current version of the CFG at all times.

If SWS requirements are changed at some point in the future by the DOE, the CEO WAP will send confirmation to the DOE Project Officer responsible for Colorado that CEO WAP acknowledges these changes in the SWS requirements, has issued an electronic memorandum to all subgrantees identifying the changes, and that the controlled copy of the CFG on the CEO WAP online database has been updated to reflect these changes. The CEO WAP will submit a variance request pertaining to any new SWS requirements, via the standard variance procedure, to the DOE Project Officer, if the CEO WAP feels it is warranted.

#### **WORK QUALITY CONTRACT LANGUAGE**

Per WPN 15-4, CEO WAP is required to include language in all subgrantee contracts that identify the requirements for work quality. CEO WAP developed the following work quality language beginning in PY15-16 that will be included in all PY21-22 subgrantee contracts scopes of work:

1. “The CEO WAP Weatherization Field Standards, CEO Weatherization Colorado Field Guide, and CEO Weatherization Policies and Procedures shall apply to the Grantee and their subcontractors providing weatherization services through the Colorado Energy Office Weatherization Program (CEO WAP) in order to ensure consistency in work quality”

#### **FLOW-DOWN REQUIREMENTS**

Per WPN 15-4, all subgrantee contracts signed with subcontractors will contain language which clearly states that subcontractors must meet all the requirements contained within the CFG, as well as CEO WAP policies and procedures.

#### **CONFIRMATION OF RECEIPT**

Per WPN 15-4, CEO WAP will use the signature on the contract as the method by which a subgrantee confirms receipt.

### **V.5.3 Final Inspection**

#### **QCI INSPECTOR MODEL/QCI POLICIES AND PROCEDURES**

The CEO WAP has decided to utilize an Independent QCI model in which the subgrantee or subcontracted QCI Inspector is not permitted to have had any prior involvement with the unit being inspected. The CEO WAP complies with all final inspection requirements outlined in WPN 15-4.

#### **SUBGRANTEE QCI INSPECTOR STAFFING LEVELS**

Subgrantee QCI inspector staffing levels should be commensurate with subgrantee needs based on a combination of size, funding, and unit production. Although the CEO WAP does not require a subgrantee to have a specific number of QCI certified Inspectors on staff, the CEO WAP does require that all subgrantee employees who conduct Final Inspections of units be QCI certified. Subgrantees are required

to have policies and procedures in place to address subgrantee shortages of QCI Inspectors. All subgrantees have adequate capacity of QCI certified Inspectors.

### **SUBGRANTEE QCI FINAL INSPECTION**

All units reported as completed by a subgrantee must receive a final inspection from a subgrantee QCI certified inspector, or third party QCI Inspector if needed. The QCI certified inspector must ensure that all work meets the minimum specifications as outlined in the CFG and must meet the applicable standards as found in 10 CFR 440. Units are deemed to be completed by CEO WAP once the QCI certified inspector has determined that all incidental repair measures, energy conservation materials, and any necessary health and safety repairs have been installed in compliance with CFG standards and all installations meet all DOE SWS standards, if applicable. QCI Inspectors are responsible for ensuring all materials have been accurately reported on the Building Weatherization Reports (BWR's), and that all energy savings measures listed on the BWR reflect accurate cost estimation. Inspectors are required to ensure accurate reporting of all measure costs, materials, and fuel types for all jobs in either NEAT or MHEA or approved multifamily auditing software.

All client files must include a form, signed by the QCI certified Inspector for the unit, signifying that all weatherization work performed by the subgrantee has met all applicable CFG or NREL SWS Standards. The QCI Final Inspector Report must include an assessment of the original audit, confirmation that the measures called for on the work order were appropriate per the audit procedures and protocols approved by the DOE, a record of final diagnostic testing, and that all measures costs were reported accurately.

### **SUBGRANTEE QCI CORRECTIVE ACTION PROCEDURES**

Per Department of Energy (DOE), Weatherization Program Notice (WPN) 19-1, Program Year 2019 Weatherization Grant Guidance, Section 2.5, Quality Work Plan Implementation, and WPN 15-4 "Quality Work Plan Requirement Update," Quality Control Inspector (QCI) subgrantee inspectors "who repeatedly fail to perform to program expectations must be disqualified from performing work in the future. Grantees must establish protocols to remove poor performers from their network." Also, subgrantees must establish internal protocols to remove poor performing QCI contractors from the network. When a subgrantee QCI fails to adequately inspect to the most recently approved SWS and Colorado Field Guides, he or she will be subject to the following corrective action procedures:

- Corrective Action-Removal Procedures are dictated by the number of Quality Assurance (QA) identified defects of similar nature requiring corrective action that can be directly tied back to a specific subgrantee QCI inspector during a single QA visit over a two-year program period
  1. First QA identified corrective action defect of similar nature: Subgrantees shall fix issues using non- DOE funds and conduct classroom training within the subgrantee for the inspector prior to them performing subsequent inspection work within the network.
  2. Second QA identified corrective action defect of similar nature: Subgrantees shall fix issues using non DOE funds, conduct classroom training outside of the subgrantee, and supervised on-the-job training for the inspector prior to them performing subsequent inspection work within the network.
  3. Third QA identified corrective action defect of similar nature: Subgrantees shall fix issues using non-DOE funds, suspend the inspector from performing inspections for a 6month period from the date of inspector notification, and have the inspector complete a QCI performance plan during the suspension period prior to them performing subsequent inspection work within the network.

4. Fourth QA identified corrective action defect of similar nature: Subgrantees shall fix issues using their own funds (not from any Weatherization grant) and then permanently disqualify the applicable inspector from performing all future inspection work within the network.
- Corrective Action-Removal Procedures Tracking: Subgrantees are responsible for tracking where each impacted inspector is within the process outlined above. If subgrantees suspend or permanently disqualify an inspector, they shall notify the CEO Manager responsible for Quality Assurance via email. Prior to hiring and providing subsequent QCI inspection work to an inspector, subgrantees are responsible for checking with the Quality Manager to ensure that the inspector is not suspended or permanently disqualified.

The corrective action-removal procedures listed above are outlined in CEO WAP Policy 602 Corrective Action-Removal Procedures. Additionally, per WPN 11-3, if a DOE funded unit has received a final inspection, subgrantees cannot return and expend DOE funds for corrections.

### **PROCESS FOR VALIDATING SUBGRANTEE CERTIFICATIONS**

In accordance with WPN 15-4, the CEO WAP has developed a comprehensive process for ensuring that all subgrantees acquire and maintain Building Performance Institute (BPI) QCI certifications for all inspectors. All subgrantees are required to include a list of all QCI certified Inspectors that are on staff, as well as the date that each Inspector's existing certification expires, as a part of their annual Training Plan. These Training Plans are to be submitted as a required component of each subgrantee's annual Competitive and/or Noncompetitive RFA Applications. CEO WAP staff review all Training Plans to ensure compliance with this requirement. Competitive or noncompetitive applications missing these requirements will not be accepted by CEO WAP staff.

In addition to checking subgrantee Training Plans, CEO WAP Technical staff will use the BPI/QCI certification database to periodically check that each employee identified by a subgrantee as having a current QCI certification on their Training Plan is QCI certified at the time of the Training Plan submission. If CEO WAP Technical staff find that either an individual listed as an Inspector on the Training Plan does not have a current QCI certification, or that an existing certification has expired and has not been renewed, CEO WAP Technical staff will issue an electronic memorandum to the subgrantee director or Program Manager, and copy all Trainers, that the employee needs either certification or recertification. A subgrantee representative (either the Executive Director, Program Manager, or a Trainer) must respond within 30 business days with a plan to certify the individual. Subgrantees are prohibited from allowing Inspectors without a current QCI certification to conduct Final Inspections of any units. Subgrantees who fail to comply with this requirement are subject to the Policies to Address Subgrantee Noncompliance listed later within this section.

### **SUBCONTRACTOR QCI INSPECTOR STAFFING LEVELS**

Recognizing that subgrantees may encounter situations in which subgrantee QCI staffing levels are not adequate to meet production needs, the CEO WAP will allow independent, third party subcontractors to perform QCI inspections provided that the subcontractor has a current QCI certification.

### **SUBCONTRACTOR QCI INSPECTIONS**

In the event that subgrantees utilize a contractor to perform final inspections, the subgrantee must ensure that those contractors possess a QCI Inspector certification and will inspect to the level required by the SWS as outlined in the CFG.

## **PROCESS FOR VALIDATION OF SUBCONTRACTOR QCI CERTIFICATION**

Subgrantees are responsible for ensuring subcontractors have a current QCI certification at the time the work is performed. Subgrantees who allow non-QCI certified subcontractors to perform Final Inspections are subject to CEO WAP noncompliance procedures and may have all costs associated with that job disallowed.

## **CEO WAP QCI INSPECTOR STAFFING LEVELS**

The CEO WAP currently operates under the Independent QCI Model, which requires CEO WAP Technical Staff to perform QCI Inspections of a minimum of 5% of units reported as completed using DOE funds across the State. Currently, the CEO WAP believes that three on staff certified QCI Inspectors are adequate to complete inspections of 5% of DOE funded units. Three CEO WAP Technical staff members have successfully received their QCI certifications or recertifications and are able to conduct inspections on all DOE funded units beginning July 1, 2020.

## **CEO WAP STAFF QCI INSPECTIONS**

CEO WAP staff are required to conduct onsite examinations of subgrantee and subcontractor work on 5% of DOE funded units designated as complete by subgrantees. These onsite audits are inspected to ensure that all weatherization work has been done in accordance with SWS and CEO policies, and to assess subgrantee inspector effectiveness and knowledge. QCI certified CEO WAP staff members will sign a Final Inspection Form indicating that the job has been inspected by a CEO WAP QCI certified Inspector and has passed all QCI requirements. This document has been developed by the CEO WAP and is available for DOE Project Officer review at their request.

## **PROCESS FOR VALIDATION OF CEO WAP STAFF QCI CERTIFICATIONS**

CEO WAP Technical staff are required to be QCI certified at all times and are responsible for all certification and recertification. Proof of QCI Certification and recertification of all CEO WAP Technical staff are available to the assigned DOE Project Officer as requested.

## **POLICIES TO ADDRESS SUBGRANTEE NONCOMPLIANCE**

Per 2 CFR 200.338, if a subgrantee fails to comply with any term of an award as stated in Federal or CEO WAP policies and procedures, the subgrantee may be subject to one or more of the following actions:

1. Temporarily withhold cash payments pending correction of the deficiency.
2. Disallow all or part of the cost of the activity or action not in compliance.
3. Wholly or partly suspend or terminate the current award.
4. Withhold further awards.
5. Board notification and required response from the Board.
6. Take other remedies that may be legally available.
7. May result in reallocation of funding or production to another CEO WAP contracted entity.

If a subgrantee has a repeated history of poor performance, financial instability, mismanagement, violates the terms and conditions of the Cooperative Agreement (contract), or is irresponsible in administering the Weatherization program, the CEO WAP may impose additional requirements needed in the following manner:

1. Subgrantee will be notified in writing (mail or electronically) as to the special conditions.
2. Reasons why the special conditions are being imposed.
3. Nature of required corrective action.
4. Time allowed for completion of the corrective action.

The standard CEO WAP grievance procedure can be requested by the subgrantee at any time. Once the special conditions have been corrected to the satisfaction of the CEO WAP they will be removed.

In addition to the above remedies, funding may be suspended in whole or in part by CEO WAP for frequent or repeated violations as well as financial mismanagement. In such a case written notification will be sent to the subgrantee and DOE stating the reasons for suspension, the effective date, and in the case of a partial termination the reduced or modified portion of the funding. Should termination of an subgrantee contract be determined the following steps will be taken:

1. Notification in writing and effective date of termination to the subgrantee.
2. Complete inventory of all tools, materials, equipment and capital equipment will be conducted.
3. All grant purchased items (capital equipment, computers, tools, inventory, etc.) will be removed from the premises.
4. Close out procedures will begin.
5. All other actions will be determined by the CEO WAP Director.

In addition to these noncompliance measures, standard contract language included in each subgrantees contract further outlines the remedies available to the State of Colorado.

#### **MULTIFAMILY INSPECTOR TRAINING**

A three week long Multifamily Quality Control Inspector Training and Certification was completed on March 15th, 2019. Santa Fe Community College, EnergySmart Academy, an Interstate Renewable Energy Council (IREC) accredited training entity, provided a two week online, one week in-person training, proctoring, and certifications. CEO Quality Control Inspectors attended, tested out, and received certification. The training course covers most of the Job Task Analysis (JTAs), but it is not an IREC Accredited certification. When the Multifamily Inspector QCI requirements become effective, Subgrantees doing multifamily work will review the requirements, develop a compliance plan, attain the specific multifamily QCI certification needed, and ensure compliance via only having those who attain the specific multifamily QCI certification inspect their projects.

#### **V.6 Weatherization Analysis of Effectiveness**

The CEO WAP utilizes a three-pronged approach to assess subgrantee effectiveness in relation to overall program administration and performance. This three-pronged approach allows CEO WAP staff to conduct multifaceted analysis of the program that allows CEO WAP to use historical performance and current program trends to identify and mediate any potential issues that might impact the program in the future. The CEO WAP believes that this process leads to long-term program stability, effective and responsible utilization of taxpayer funds, and overall program health. The three methods used by CEO WAP staff to evaluate program effectiveness include:

1. Evaluating subgrantees in regards to specific performance indicators,
2. Evaluating a subgrantees risk in relation to proper administration of grant funding through a Risk Management Assessment, and
3. Analyzing performance in relation to other subgrantees with similar subgrantee profiles.

The following sections provide greater detail as to how CEO WAP staff use each of these three methods to evaluate subgrantee and program effectiveness.

#### **PERFORMANCE INDICATORS**

Using previous program year data, the CEO WAP has identified the following five performance indicators that generally can be used to assess subgrantee effectiveness and overall program success. These performance indicators are:

1. Efficient Spending of DOE Funds – Subgrantee effectiveness is largely determined by the full and efficient spending all allocated DOE funds within a designated program year. Subgrantees that consistently bill to the grant show proper use of ASHRAE testing and installation requirements, proper allocation of subgrantee resources, effective use of funds, proper program administration, proper understanding of allowable and disallowable costs, and successful implementation of the program in general. From a top-level perspective, subgrantee spending of DOE funds in a responsible manner ensures program continuity in future funding cycles, which assists in the overall health of the CEO WAP.
2. Per Unit Average (PUA) – Program effectiveness is also determined by how well subgrantees are able to meet or better their target PUA for DOE allocated funds. Subgrantees that meet or better their target PUA show proper financial and program administration, as well as a fundamental understanding of allowable and disallowable costs. Subgrantees are consistently compared to their historical PUA to identify trends around efficient unit production. Issues such as spikes in costs, or growth in labor charged to the grant are assessed to identify deficiencies or trends that may show that subgrantees are not conducting work effectively.
3. Unit Production – The third component that determines subgrantee effectiveness is how successful subgrantees are at providing high quality weatherization services to low income citizens of Colorado. This unit of effectiveness is measured by how many high quality, cost effective units a subgrantee is able to complete in a given program year. Subgrantees are allocated contractual targets based on a standard formula of total DOE budget/PUA and are assessed on their ability to meet these targets. Subgrantees that meet or exceed proposed production trends are deemed more effective and show greater program administration than those which lag in their proposed production targets.
4. Service in all 64 Colorado Counties – Due to the significant amount of leveraged funding that Colorado receives, it is increasingly important to ensure service to all 64 Colorado counties. The CEO WAP requires that each county receive a minimum of one weatherized unit per program years. Service to all 64 counties in Colorado shows proper use of the prioritization requirements, proper administration of program dollars and ensures overall program health.
5. Quality Installation of Weatherization Materials – Subgrantees are also assessed on how effectively they utilize DOE funding to perform quality installation of weatherization materials. This performance indicator is assessed using the following 4 metrics as identified below.
  - a. Site Visits: The site visit provides CEO WAP staff an opportunity to assess not only the quality of the work, it also allows CEO WAP staff to assess subgrantee compliance with SWS Field Standards and CEO WAP policies and procedures. This provides CEO WAP staff an opportunity to provide real time training to subgrantee field staff in both SWS standard and CEO WAP policies and procedures to enhance the program.
  - b. Utilization of the CEO WAP online database: All installed measures on a home are collected through CEO WAP online database and can be sorted, compared and evaluated in real time. This data provides insights regarding: costs per unit, costs related to field functions or office functions, types of energy efficiency and health/safety measures being performed and their relative frequencies, and beginning and ending air leakage rates. The CEO WAP monitors this data to determine if agencies are under performing or lacking proficiency in any one area. This data, along with the site visit information,



provides a starting point for empirical and qualitative assessment of the effectiveness of the work being performed.

- c. Quality Assurance Reports: Following a site visit, CEO WAP staff examines past quality assurance monitoring reports to identify recurring quality deficiencies within specific measures and/or processes. This process allows for the identification of Specific Training needs for specific subgrantees and also allows CEO WAP staff to identify issues that may occur across the entire subgrantee network, which could lead to additional Specific subgrantee network trainings as needed. This allows the subgrantee network greater program knowledge and a path to continuous improvement.
- d. Communication with Subgrantees: The CEO WAP staff is in continuous communication with subgrantee staff on waiver requests, question and answers, T&TA calls and T&TA meetings. Frequently, the training needs of a subgrantee are best understood by themselves and are expressed accordingly. This interaction, and the information gathered from it, is vital to determining the training needs of agencies and their staff and to assess the overall health of the program.

### **RISK MANAGEMENT ASSESSMENT**

Per CEO WAP policy, each subgrantee undergoes a Risk Management Assessment that classifies each subgrantee as either a low, medium, or high risk to the CEO WAP, and by extension, all CEO WAP funding partners. This comprehensive Risk Management Assessment includes a detailed, six-step audit of all aspects of subgrantee organizational methods, financials, work quality, including the following risk factors as outlined in standard CEO WAP policy. These risk factors include:

1. Substantial financial or programmatic mismanagement is documented utilizing but not limited to the Administrative Monitoring Reports. "Substantial" is defined as disallowed costs of a large dollar amount (generally \$1,000 or more, or of a repetitive nature).
2. Gross or deliberate neglect of generally accepted workmanship standards as evidenced utilizing QA Field Monitoring Reports. "Gross neglect" is defined as frequently recurring corrective action item deficiencies that have not improved through additional training and guidance.
3. Production goals are not completed in a timely manner, according to the goals set forth in the current program year's contract and as documented in monthly production reports.
4. Substantial noncompliance with applicable rules and regulations as documented in Admin Monitoring, QA Field Monitoring, monthly production reports, or monthly fiscal reports.

The CEO WAP implements subgrantee risk management assessment by applying a comprehensive six-step risk management plan that includes the following steps:

1. Identifying Standards for Subgrantee Success (can be considered low-risk)
2. Identifying and Evaluating Relevant Stakeholders (actively involved, impacted by performance, and exert influence)
3. Conducting Communication (inform and collaborate with stakeholders on risk management plan implementation)
4. Conduct Risk Assessment (outline risk status, identification, categorization, impact and probability, and prioritization)
5. Develop Avoidance, Mitigation, and Response (avoid and mitigate all risks, while implementing response plans for high priority risks)
6. Oversight (systematic monitoring and control reviews)

Once the avoidance, mitigation, and response step is successfully implemented at the subgrantee level and verified through oversight by the CEO WAP, the subgrantee is then reassessed with the intent of decreasing their overall risk status. This process allows CEO WAP to identify specific subgrantee risks and, using a replicable process, enact comprehensive change to reduce risk to the Grant. This provides CEO WAP with greater overall information, allows CEO WAP to assess subgrantee compliance, and to increase overall program health..

### **SUBGRANTEE PROFILE COMPARISON**

The CEO WAP also assesses a subgrantee’s effectiveness based on comparisons to other subgrantees with similar subgrantee profiles. These subgrantee profiles include elements that are not necessarily financial in scope, things such as heating degree days, population characteristics, size of territory served, region specific costs, budgets, subgrantee organizational structures, and many other elements that have a direct impact on how effective a subgrantee is in delivering service. By comparing subgrantees with similar subgrantee’s profile, CEO WAP can better identify subgrantee deficiencies, long term program trends, evaluate cost effectiveness of service, innovative best practices, and track the true financial and administrative impact of changes to CEO WAP and DOE policies and procedures. This allows CEO WAP to identify potential issues in advance and allows CEO WAP to continuously update and tailor the program to preemptively address these issues. This process leads to long term program stability, effective and responsible utilization of taxpayer funds, and overall program health. This process also allows for the identification of training needs that exist within the subgrantee network which allows CEO WAP to customize Specific training needs to support both national Comprehensive training and standards as well as CEO WAP and industry best practice standards.

### **V.7 Health and Safety**

Per WPN 17-7 and 10 CFR 440.16, subgrantees are required to develop and implement detailed Health and Safety plans to ensure the health and safety of both workers and clients at all times. Subgrantee Health and Safety Plans must comply with all Occupational Safety and Health Administration (OSHA) regulations, all Colorado (SWS) Field Guide Health and Safety standards, all CEO WAP Health and Safety standards, as well as any other applicable State or Federal health and safety regulations. Subcontractors hired to perform weatherization work for a subgrantee are required to follow all Health and Safety standards as listed within the subgrantees Health and Safety Plans and the CFG. The CEO WAP complies with all health and safety requirements outlined in WPN 17-7.

(reference “Health and Safety Plan” attachment to the SF-424)

### **V.8 Program Management**

#### **V.8.1 Overview and Organization**

The CEO WAP operates within the Colorado Energy Office (CEO). CEO WAP staff consists of:

Deputy Director: Dominique Gomez

Director: Ryan Harry

Senior Project Manager: Ryan Manzik

Senior Program Manager: Stephanie Insinna-Sahondo

Program Manager: Amy Miller

Program Associate: Elizabeth Jaenicke

Program Associate: Elizabeth Lenox

Program Associate: Barbara Pazos

Senior Technical and Training Manager: Andy Cordova  
Quality and Technical Manager: Zac Stewart  
Quality Manager: Jacob Wolff  
Quality Management Team: *Position TBD*

Other CEO staff provide support to the weatherization program, such as the CEO Executive Director Will Toor, Procurement Director Sara Graf, Director of Accounting and Budget Gregg Hefner, Senior Budget Analyst Natalie Doerre, and Accountant Alex Lopez

#### **ALLOCATION OF STAFF SALARY COLORADO FISCAL YEAR 2020-21**

Deputy Director: Admin 10%, T&TA 0%  
Director: Admin 26.3%, T&TA 69.7%  
Senior Project Manager: Admin 19.8%, T&TA 54.55%  
Senior Program Manager: Admin 16.55%, T&TA 57.8%  
Program Manager:  
Program Associate: N/A  
Program Associate: N/A  
Program Associate: Admin 20.1%, T&TA 54.25%  
Quality Manager: Admin 17.2%, T&TA 78.8%  
Senior Technical and Training Manager: Admin 19.1%, T&TA 76.9%  
Technical and Training Specialist: Admin 21.3%, T&TA 74.7%

#### **ALLOCATION OF STAFF SALARY COLORADO FISCAL YEAR 2021-22**

Deputy Director: Admin 10%, T&TA 0%  
Director: Admin 23.35%, T&TA 35.00%  
Senior Project Manager: Admin 15.55%, T&TA 42.80%  
Senior Program Manager: Admin 18.80%, T&TA 39.55%  
Program Manager: Admin 18.80%, T&TA 39.55%  
Program Associate: Admin 19.10%, T&TA 39.25%  
Program Associate:  
Program Associate:  
Quality Manager: Admin 14.25%, T&TA 44.10%  
Senior Technical and Training Manager: Admin 16.15%, T&TA 42.20%  
Quality and Technical Manager: Admin 18.30%, T&TA 51.70%

#### **V.8.2 Administrative Expenditure Limits**

The following budgetary caps are not to be exceeded by the CEO WAP and by extension all subgrantees:

1. No more than 15% of any DOE grant may be used by the grantee and subgrantees for administrative purposes.
2. Not more than 7.5% may be used by the CEO WAP for administrative purposes.
3. No less than 7.5% must be made available to subgrantees by the CEO WAP.
4. The CEO WAP may provide up to an additional 5% to subgrantees receiving grants of less than \$350,000 of new DOE money.
  - a) Program income and leveraged resources that are used in the DOE Weatherization Program may be treated as appropriated funds, in which case these funds can be added to the total appropriated funds to determine overall administrative costs.

The CEO WAP will perform a financial needs assessment to determine if any subgrantee receiving less than \$350,000 total funding in any program year requires more than 7.5% to cover administrative costs. All subgrantees will receive at least 7.5% of their allocation in the form of administration funds. For PY21-22 all subgrantee agencies will be funded at more than \$350,000 and therefore this is not a consideration.

### **V.8.3 Monitoring Activities**

Per WPN 20-4, the CEO WAP is responsible for executing the activities identified in the State Plan as approved by DOE. This responsibility includes ensuring that grant funds are expended in accordance with applicable law, including the regulations contained in 10 CFR 440, Financial Assistance Rule 2 CFR 200, Weatherization Program Notices, and other procedures that DOE may issue. Specifically, the CEO WAP is required to conduct monitoring and oversight of all subgrantees in the following areas:

1. Programmatic and Management Monitoring
  - a) Subgrantee Review
  - b) Financial/Administrative
  - c) Equipment/Inventory/Materials
  - d) Eligibility
  - e) Rental
  - f) Feedback and Reporting
  - g) Energy Audits
  - h) Field Work
  - i) Health & Safety
  - j) Quality Assurance Subgrantee Monitoring
  - k) Training & Technical Assistance
  - l) Staff or entity performing the monitoring
  - m) How monitoring results are handled and required follow-up procedures
2. Subgrantee Monitoring
  - a) Program Overview (Client File Review, Work Orders, etc.)
  - b) Financial/Administration
  - c) Inventory
  - d) Energy Audits
  - e) Qualifications & Training
  - f) Weatherization of Units
  - g) Health & Safety
  - h) Final Inspections
  - i) Staff or entity performing the monitoring
  - j) How monitoring results are handled and required follow-up procedures
3. Financial Monitoring
  - a) Financial Management/Accounting Systems and Operations
  - b) Audits
  - c) Payroll/Personnel
  - d) Vehicles and Equipment
  - e) Procurement
  - f) Invoicing
  - g) Records Retention
  - h) Staff or entity performing the monitoring

- i) How monitoring results are handled and required follow-up procedures  
Sub-awards/Subgrantee Monitoring

Per 10 CFR 440.12(b)(6), CEO WAP accomplishes oversight and monitoring of subgrantees by conducting annual administrative and technical monitoring that allows CEO WAP staff with specialized knowledge in these specific areas to assess subgrantee compliance. Per DOE guidance, the CEO WAP reserves the right to monitor more units than the baseline requirement for subgrantees who have significant deficiencies. CEO WAP monitoring staff is comprised of one FTE who is responsible for conducting administrative monitoring of subgrantees in relation to financial and administrative functions, 0.8 FTE certified QCI Inspector/0.2 FTE Trainer, and two 0.4 FTE certified QCI Inspectors/0.6 FTE Trainers, who are responsible for performing technical monitoring of subgrantees related to the installation of energy conservation measures and health and safety repairs in clients' homes. For PY21-22, the following individuals will conduct monitoring of the following subgrantees:

Amy Miller AND Elizabeth Jaenicke: Administrative/Financial Monitoring – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, Energy Resource Center, and Energy Outreach Colorado Efficiency, LLC

Jacob Wolff: (0.8) Technical Monitoring /(0.2) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, and Energy Resource Center

Andy Cordova: (0.4) Technical Monitoring/(0.6) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, Energy Resource Center, and Energy Outreach Colorado Efficiency, LLC

Zac Stewart: (0.4) Technical Monitoring/(0.6) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, and Energy Resource Center

### **ADMINISTRATIVE MONITORING**

Administrative monitoring of all subgrantees is conducted by either the Senior Program Manager or Program Manager and Program Associate at a minimum of once per program year. During an administrative monitoring, each subgrantee's programmatic and financial management are reviewed for compliance with DOE and CEO WAP policies and procedures. Following the completion of an administrative monitoring, the Senior Program Manager is required to complete and submit to the subgrantees the standard CEO WAP Administrative Monitoring Report within 30 days of conducting the administrative monitoring.

Prior to the monitoring, subgrantees submit electronic versions of core policies, procedures, financial audits, and key operational documents for review and archiving. Administrative monitoring is primarily concerned with addressing subgrantee performance in the following areas:

1. Organizational Information
2. Outreach and Production

3. Personnel
4. Documentation
5. Procurement
6. Inventory
7. Financial Management

Administrative monitoring allows CEO WAP staff to disseminate efficiencies by identifying administrative best practices that can be shared with other subgrantees, thus, reducing functional program requirements where feasible, building in quality checks for administrative processes and procedures, and identifying ways of streamlining operations.

The Administrative Monitoring Report contains the following elements:

- A. Introduction
- B. Methodology
- C. Administrative Monitoring Review
- D. Client File Review
- E. Action Items
- F. Subgrantee Acknowledgment and Performance Statement

Upon receipt of the Administrative Monitoring Report, subgrantees have 30 days to have their authorized representative sign the Administrative Monitoring Report, archive internally for future reference, and provide corrective action plans back to the CEO WAP addressing all deficiencies identified during monitoring, per WPN 20-4. The corrective action plans must identify a process and resolution to address a major deficiency and state a reasonable time period for resolution to occur.

#### **CLIENT FILE REVIEW**

As part of administrative monitoring, a minimum of 5% of all DOE funded client files are provided for review to ensure subgrantee compliance with DOE and CEO WAP client file requirements. In order to ensure transparency and consistency across all client file reviews, the Senior Program Manager uses the standard CEO WAP Client File Checklist, which is sent to all subgrantees prior to a monitoring, that is completed for each inspected client file. The checklist includes the following elements, as applicable:

1. Unit Information (i.e. funding source, heating fuel, job number, own or rent, priorities, structure type, year built)
2. Eligibility and Permission (i.e. application date, call-back and go-back documentation, client complaint and resolution documentation, client sign and date application, copy of valid ID, deferral information, lawful presence affidavit, permission form for client and landlord if renter, permission to photograph, prequalified or income qualified, subgrantee sign and date application)
3. Field Requirements (i.e. ASHRAE 62.2 calculation form, audit form, BWR accurate to application, CAZ summary, chemical sensitivity form, CIP documentation, cost records and invoices, date of final QCI inspection, deviation documentation, duct testing, final inspection form, final QCI inspector sign and date, health and safety inspection/notification form, HVAC system efficiency testing, insulation sheets, mold form/moisture assessment, NEAT or MHEA audit/work order, NEAT or MHEA economic analysis report, permits, photo documentation, pre and post blower door tests, radon informed consent language/form, radon pamphlet received by client and landlord if renter, refrigerator replacement form, state waivers, subgrantee waivers, suspected asbestos material inspection form, utility data consent forms, ventilation calculation form)

4. Renovate Right Procedures (RRP) (i.e. certified renovator certificate, lead safe pamphlet)
5. State Historic Preservation Office (SHPO) (i.e. historical documentation, historical property, required SHPO review)
6. Landlord Contribution (i.e. contribution amount, date of landlord payment)
7. Rooftop PV (i.e. CEO WAP Program Manager approved waiver, cost records and invoices, DOE project officer approval email, rooftop PV final inspection form, rooftop PV owner agreement, solar assist grant form, solar site assessment, solar workbook printout)

Included in the Administrative Monitoring Report are details regarding deficient areas of client files. Subgrantees are required to develop action plans based on deficiencies and are required to regain compliance prior to the end of the program year. CEO WAP staff check to ensure that any issues that occur with client file documentation are corrected by the subgrantee in accordance with the severity of the violation.

#### **ANTICIPATED PY21-22 ADMINISTRATIVE MONITORING SCHEDULE**

Due to costs associated with administrative monitoring, the Senior Program Manager typically conducts the administrative monitoring and client file review during the same visit, however, due to unit production schedules and when units are reported as closed, this can sometimes pose a challenge. As a result, the Senior Program Manager may or may not be able to complete both portions of the review at the same time. The schedule, which is subject to change, for PY21-22 is:

R2: Pueblo, April 2022

R4: HRWC, May 2022

R5: NWCCOG, March 2022

R7: Arapahoe, December 2021

R8: ERC, February 2022

R11: EOCE, June 2022

Additionally, the CEO WAP will perform an annual review of Subgrantee Financial Audits.

#### **TECHNICAL MONITORING**

Technical monitoring of subgrantees allows CEO WAP Technical staff to assess subgrantee work in regards to the quality installation of weatherization materials, incidental repair measures and health and safety measures. The technical monitoring schedule typically begins in late August and runs through the end of June and is dependent upon when subgrantees report closed units for DOE jobs; this usually requires 3-5 inspections per subgrantee. When the subgrantee reports an adequate number of DOE jobs as being closed, members of the CEO WAP Technical team inspect the work to ensure the work is being completed in accordance with DOE, CEO WAP, and SWS standards, rules and regulations.

The quality of the field work and client service is assessed by conducting onsite visits of homes served at various stages in the production process (during initial audits, while work is in progress, accompanying the subgrantee inspector, or after the home has been reported to the state as a completed unit). A minimum of 5% of completed units receive an onsite inspection by the CEO WAP technical team. This approach provides the greatest possible insights into the subgrantee's processes and how these processes might be affecting quality. Also, the opportunity to have a positive impact upon local performance is increased by interacting with the local field staff during the work (thus providing immediate feedback) rather than just communicating feedback to them indirectly (via reports which are addressed to management staff). This will allow both state and subgrantee staff to ascertain the overall

quality of measures and to recognize trends, both within the subgrantees' organization and throughout the state. Statewide or region-wide problems will be addressed in group training and seminars. The specific needs of an individual subgrantee will be addressed through T&TA visits. Work quality is assessed and recorded via Technical Monitoring Reports that are issued to each subgrantee by CEO WAP staff within 30 days of the visit, following a QA monitoring. These reports are used to identify areas of strength and weakness found during the QA visits, and identify quality issues related to the installation of weatherization materials. CEO WAP Technical staff classify all inspected work into one of the following categories:

1. No Corrective Action Deficiencies – No deficiencies constituting substantial noncompliance with CEO WAP Policy or the Colorado Field Guide.
2. Corrective Action Deficiencies – Deficiencies constituting substantial noncompliance with CEO WAP Policy or the Colorado Field Guide.
3. Recommendation – Conditions observed that do not constitute substantial noncompliance with CEO WAP Policy or the Colorado Field Guide.
4. Best Practice – Work installed or weatherization processes completed that are exemplary in nature.

Once the QA report has been completed, CEO WAP Technical staff forward the report to the appropriate subgrantee's designated point of contact, and request a signature indicating that the subgrantee has read the QA report in its entirety. The subgrantee has 30 days from receipt of the report to return a signed copy indicating the subgrantee has read the report, and, in the case of corrective action deficiencies, have developed an action plan for remedying all corrective action deficiencies.

#### **VIRTUAL TECHNICAL MONITORING PLANS**

##### **Technical Monitoring (Final Inspection by Grantee):**

The virtual Technical Monitoring would consist of receiving the contents of the client file before the virtual site visit. The file review would be completed, and any questions or comments noted so the Grantee monitor could respond during the virtual site visit. For the actual site visit, we would have the Subgrantee conduct a live streaming application so the Grantee monitor could observe the completed work and all diagnostic testing. We would be using all the same forms, checklists, and procedures we do when on site. This virtual technical monitoring will be conducted to satisfy the Grantee final inspection requirement (5%) of completed units.

##### **Step Process:**

1. A completed unit that needs a final inspection is selected and the client file is sent to Grantee staff electronically.
2. The monitors view the contents of the file and views the home via Google Earth if available. Notes are made in preparation.
3. The Subgrantee is present for the final inspection and will video call the Grantee monitor from the vehicle when they arrive on site.
4. The Subgrantee conducts the inspection, and holds the device for very clear and focused zooming on the inspection that is being done. The Subgrantee may have more than one device on hand as a backup if the first one battery life is not long enough to support the entire final inspection. The Subgrantee describes each activity like they would during a



proctored field exam.

5. Everything that the Subgrantee would normally do is completed and video streamed with the Grantee monitor. The Grantee will ask the team of inspectors to slow down, stop, explain, or show a closer shot of certain measures as needed.

6. The diagnostic testing is highly important, and the camera must be angled to clearly see the meters, gauges, location of testing, and appliance operation. It is assumed this will take the most time of the inspection.

7. As the final inspection is ending, the Grantee monitor gives the inspectors an opportunity to address anything they might have missed.

8. If it appears the home is being left in an unsafe manner, the Grantee monitor alerts the inspectors so that it can be corrected, and notations are made for the monitoring letter. Observations are made about how the inspectors addressed problems with the work or missed opportunities.

9. The final inspection visit is compared to the client file, and technical tool for consistency as the final inspection procedures are concluded.

#### **Technical Monitoring (Work In-Progress):**

The virtual Technical Monitoring for work-in progress would consist of Subgrantee staff conducting a live streaming application with the Grantee monitor could observe the work being performed and view any diagnostic testing. We would be using all the same forms, checklists, and procedures we do when on site.

#### **Step Process:**

1. A client is selected from homes that have been assessed with materials and supplies on hand. If possible, select a home with multiple measures being installed to gain a wider understanding of the Subgrantee's overall field practices. The client name and address are sent to Grantee staff prior to the virtual monitoring visit.

2. Once the Subgrantee's staff has unloaded their equipment and started work, they will contact the Grantee monitor for a group video call. This occurs from the vehicle to obtain street view.

3. The Grantee monitor will observe the staff working from the street view and approach with the person operating the device the staff and tour the job site. The person operating the device should be familiar with that home's scope of work to know what areas of the home to view. It will be requested that the tour is slowed with closer zooms on areas the Grantee monitors need to see with more detail.

4. Each worker starting with the crew leader is asked what he or she is working on and how they are doing it.

5. The Grantee monitor views the condition of the vehicles and tools and views safety

equipment, location of PPE, and Field Guides.

6. Specific areas of work in progress are compared against the Grantee Field Guides and general OSHA compliance and safety practices are observed.

7. Safety violations or concerns are immediately brought up and communicated to the crew leader.

8. If it appears something is being missed, or not addressed properly, the team is given a chance to explain the reasoning.

9. The notes and video are later reviewed and compared to the technical tool for conclusion of the work in-progress monitoring.

**Client File Review:**

Will be completed by having the Subgrantee meet virtually using a live streaming application. The Grantee will review all documents which would normally be reviewed when at the Subgrantee. All documents will be scanned and sent to the Grantee staff prior to the virtual meeting. The Grantee staff would review the documents before the virtual meeting just as at a site visit. The Subgrantee will redact confidential client information and/or utilize a secure file transfer protocol (FTP) so confidential information can be safely shared between the local Subgrantee and the Grantee staff. The following steps will be followed:

Step Process:

1. Grantee staff will choose the required number of files to review from the list of recently completed jobs. They will provide the request to the local Subgrantee. The local Subgrantee will scan the client file and send them to the Grantee staff.
2. Grantee staff will review the files and note any questions or concerns.
3. The interview is scheduled with the Subgrantee involving key staff.
4. When the interview is complete, the information will be organized with any issues noted for follow-up during the virtual field visits.
5. If there are major deficiencies based on the Subgrantee's answers and provided information, that will also be documented in the monitoring report .

**DOE ONSITE MONITORING**

Per WPN 20-4, CEO WAP will provide all requested documents to the DOE Project Officer pertaining to the following areas during any DOE monitoring of the CEO WAP or subgrantees:

Grantee Program Materials

1. Grantee and subgrantee most recent amended agreement

2. Completed subgrantee monitoring reports
3. Monitoring tool/instrument
4. Procedures manuals for program implementation (with technical reports)
5. Most recent Grantee support contract/training entities or other contracted activities
6. Procurement documentation related to agreements
7. Inventory tracking and records

#### Subgrantee Program Materials

1. Current Grantee State Plan
2. Amended award with the Grantee (most recent version)
3. Grantee Weatherization Policies and Procedures Manual
4. Copies of files of homes to be reviewed and/or visited
5. Inventory tracking materials (if applicable)
6. Subcontractor Contracts
7. Procurement documents to verify competition
8. Most recent documentation of grantee monitoring visit
9. Costs and fixed price list (materials, services, audits, inspections, etc.)

The CEO WAP shall confirm receipt of these requests and shall provide all documentation within the time period designated by the DOE Project Officer in all instances.

#### **V.8.4 Training and Technical Assistance (T&TA)**

The CEO WAP places a high priority on training and technical assistance (T&TA) to ensure the delivery of high quality, safe, cost-effective, and consistent energy efficiency and health and safety services throughout the State of Colorado. To support this goal, the CEO WAP training program focuses on providing Specific training and technical assistance to all subgrantees while maintaining strong and consistent program administration of DOE funds. Comprehensive training is provided by IREC entities and are typically related to certifications. The following sections provide a detailed outline of the Comprehensive and Specific Technical training, as well as the Administrative Trainings that all occur under the umbrella of the CEO WAP T&TA program. The CEO WAP complies with all training and technical assistance requirements outlined in WPN 15-4.

#### **ADMINISTRATIVE TRAINING**

CEO WAP staff conduct Administrative training up to three times a year. The first annual administrative training is the Winter/Spring Meeting in which CEO WAP staff and subgrantees meet for two days to discuss CEO WAP guidelines, regulatory issues, and other administrative issues and changes that will be applicable to subgrantees in the upcoming program year. The second Administrative training performed by CEO WAP staff on a regular basis is the 2 CFR 200 training which all subgrantees are invited to attend. The 2 CFR 200 training is conducted by an outside contractor who provides CEO WAP staff and subgrantees with information regarding Federal fiscal policies, processes and changes that will be applicable for CEO WAP staff and subgrantees in the upcoming program year. The final Administrative training occurs in the summer/fall, usually within a few months of the beginning of the new program year. This CEO WAP Summer/Fall Training Meeting provides subgrantees and CEO WAP staff the opportunity to discuss changes in CEO WAP policy, understand program goals, and provide greater information as to the structure and process of the new program year. Training occurs on CEO WAP processes and procedures, reporting dates, online database training, allowable and unallowable costs, and other administrative based information.

In addition to these planned training events, the CEO WAP Senior Program Manager conducts subgrantee specific administrative training as needed. Administrative training is focused on providing, single issue, short term training to subgrantees on CEO WAP policies, procedures, database, forms, fiscals, and other administrative elements as needed.

### **COMPREHENSIVE TECHNICAL TRAINING**

Per WPN 15-4 the CEO WAP has developed and implemented a comprehensive, statewide subgrantee Technical Training Plan for PY21-22 that meets the requirements for Comprehensive training as found in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for Quality Control Inspectors (QCI), Crew Leaders, Retrofit Installers, and Energy Auditors.

Per DOE standards, all subgrantee Inspectors, Retrofit Installers, Crew Leaders, and Energy Auditors are required to receive Comprehensive training from an Interstate Renewable Energy Council (IREC) accredited program whose curriculum is aligned with the Job Task Analysis (JTA) for that occupation as identified by NREL. In order to ease the training burden, each subgrantee may select the training delivery method (i.e. in person, via distance learning, or a hybrid approach) that best meets the needs and capabilities of each subgrantee.

In order to maintain program continuity from a production and certification standpoint, subgrantees will be required to use the following timeline for certification of all subgrantee and subcontractor employees whose primary and secondary responsibilities fall within the each of the associated JTA's

### **SUBGRANTEE EMPLOYEES**

#### **QUALITY CONTROL INSPECTORS:**

CEO WAP subgrantees are required to have all individuals that are either full time or part time Inspectors receive Comprehensive training and be certified as a Building Performance Institute (BPI) Quality Control Inspectors (QCI). Inspectors that are hired must receive their QCI certification prior to conducting any final inspections for a subgrantee. In order to maintain program transparency, subgrantees are required to identify all Quality Control Inspectors on staff, as well as the date that each QCI certification expires, on the subgrantee Training Plan that is submitted annually to CEO WAP as part of the Competitive and Noncompetitive RFA process. Subgrantees will be responsible for ensuring certifications of all Inspectors are maintained and current at all times and are responsible for recertification in all instances. In addition to QCI certifications, all Inspectors must receive an OSHA 30 and Lead Safe Renovator certifications. Additionally, a minimum of one subgrantee employee, not necessarily an Inspector, must have a Colorado Certified Asbestos Inspector on staff. Subgrantee QCI Inspectors are required to receive Comprehensive Training only when they are renewing existing certifications. Certifications will be renewed and updated prior to expiration.

#### **RETROFIT INSTALLERS, CREW LEADERS, AND ENERGY AUDITORS:**

Subgrantee employees whose primary and secondary duties fall under the JTA's for Retrofit Installers, Crew Leaders, and Energy Auditors are required to undergo Comprehensive training and certification after the employees' existing Building Performance Institute (BPI) certifications have expired.

In order to maintain program transparency, subgrantees are required to identify all Retrofit Installers, Crew Leaders, and Energy Auditors that are on staff, as well as the date that each certification expires on the Training Plan that is submitted annually to CEO WAP as part of the Competitive and Noncompetitive RFA process. Subgrantees will be responsible for ensuring certifications of all Retrofit Installers, Crew Leaders, and Energy Auditors are maintained and current at all times and are responsible for

recertification in all instances. Additionally, a minimum of one subgrantee employee, must have a Colorado Department of Public Health and Environment Certified Asbestos Building Inspector on staff.

## **SUBCONTRACTORS**

### **QCI INSPECTORS**

Subgrantees are allowed to hire subcontractors to perform final inspections of DOE funded units provided that the inspector is QCI certified. Subgrantees are required to verify that all subcontractors hired to conduct a final inspection are QCI certified at all times, and that the QCI Inspector has not had any prior contact with the unit per the independent QCI model that has been adapted for the program.

### **SUBCONTRACTOR RETROFIT INSTALLERS, CREW LEADER, AND ENERGY AUDITOR**

Subcontractors hired by subgrantees are not required to have Retrofit Installers, Crew Leader, and Energy Auditor certifications, however all work performed by subcontractors must meet the standards and practices found in the CFG and SWS. Subgrantees are responsible for distributing applicable SWS guidelines to all subcontractors and are also responsible for ensuring all work performed by subcontractors meets the standards as found in the CFG at all times. Work performed that does not have an associated CFG standard, must comply with all DOE SWS Field Guide standards, if applicable. Work performed by subcontractors that do not have an associated CFG or DOE SWS Field Guide, must be compliant with standard CEO WAP policies and procedures.

All Work performed by subcontractors and approved by subgrantees that are not compliant with Colorado SWS standards may be deemed a disallowable cost and may not be reimbursed by CEO WAP. Subgrantees are allowed to hire subcontractors to perform final inspections of DOE funded units provided that the inspector is QCI certified.

Agency Trainers may invite subcontractors to participate in local field training or provide on-the-job training to subcontractors on the job-site. Subcontractors are encouraged to enroll in subgrantee training courses, such as the BPI certification courses or field internships. T&TA funds may be used to train contractors, provided that the subcontractor is participating in the program during the program year. In making the determination for contractor participation in training with grant funds, subgrantees must secure a retention agreement in exchange for the training. The contract agreement must stipulate that contractors will work in the program, at a minimum, for a specific amount of time that aligns with the cost of the T&TA provided. Subgrantees must obtain approval to enter into such agreements by the CEO prior to engaging with the contractor. After the approval process, proof of agreement in the form of a contract must be provided to the CEO before contractors can receive scholarship compensation. CEO will only compensate for tuition costs. Travel, per diem, and other ancillary costs associated with training will not be approved.

### **SPECIFIC TECHNICAL TRAINING**

Specific Trainings consist of single issue, short term, training designed to address acute deficiencies in the field or in day to day program management, or based on Quality Assurance Inspection deficiencies. The primary objective of Specific training is to review the work flow process, identify inefficiencies, and to discuss ways to improve the overall processes of subgrantees. Specific training is conducted by CEO WAP Technical staff and other approved training entities. All subgrantees will receive Specific Training during PY20-21. Specific Training consists of training in all elements of the CEO WAP, and SWS standards, including, but not limited to: combustion appliance testing, pressure diagnostics, NEAT/MHEA, work order development, SWS, ASHRAE 62.2.2016, manufactured homes, measures installation, and other trainings as requested. Training typically includes classroom training and hands on training out in the

field. In addition, a general review of the training objectives and an overview of the Weatherization Program from a national and state perspective will be conducted at each subgrantee training. Additionally, general work processes including job set up, safety, and good or best practices will be covered in the initial training review and throughout the training process.

Other, more specific Specific training needs are assessed by CEO WAP Technical staff via four methods, they are:

1. **Site Visits:** Site visits provide an opportunity for CEO WAP Technical staff to assess subgrantee work quality and compliance with the CFG and CEO WAP Policies and Procedures. Site visits consist of evaluating completed and in-progress work for adherence to CFG standards, review of client files to ensure adherence to CEO WAP policies, and to identify subgrantee specific issues that require additional training. Onsite visits help CEO WAP Technical staff to identify specific subgrantee training needs as well as best practices that one subgrantee may have developed that could be used by other subgrantees. All site visits performed by CEO WAP Technical staff have an associated Quality Assurance Report (QA Report) for that visit that provides detailed analysis of the work performed by the subgrantee on completed DOE units. Once the QA report for a subgrantee has been completed, the CEO WAP Technical staff meets to discuss the subgrantee's overall performance, outstanding issues and concerns to be aware of during future visits. During these meetings, Specific, subgrantee specific training needs are identified and discussed. If subgrantee specific training is deemed necessary, the technical team will create a training plan that will address these deficiencies. If Corrective action item deficiencies are identified during the visit, specific action items are discussed and responses are required by the subgrantee. These reports, including their corrective action item deficiencies, are stored on the CEO WAP online database and reviewed before the subgrantee's next QA visit to ensure the problem has been resolved and the subgrantee complies moving forward.
2. All information relating to installed measures are collected through the CEO WAP online database, and can be sorted, compared and evaluated in real time. This data provides insights regarding: costs per unit, costs related to field functions or office functions, types of energy efficiency and health/safety measures being performed and their relative frequencies, and beginning and ending air leakage rates. Each month, reports including subgrantee specific production analysis (including all installed measures and their costs) and fiscal analysis (including budget to actual reports) are completed and posted on the CEO WAP online database. The CEO WAP monitors this data to determine if agencies are under performing or lacking proficiency in any one particular area. Outliers are determined and necessary Specific training activities are developed by the technical team. This data, along with the site visit information, provides a starting point for empirical and qualitative assessment of the effectiveness of the work being performed.
3. External QA reports that are reviewed include, but are not limited to: DOE Project Officer monitoring reports, internal state audits, and IG reports. CEO WAP examines ALL quality assurance monitoring reports to identify recurring quality deficiencies within specific measures and/or processes.
4. CEO WAP maintains copies of all standards and policies, including the CFG, CEO WAP Policies and Procedures, and all other technical requirements on the CEO WAP online database, to which all subgrantees have access to. Upon updating the rules, regulations, or standards of any documents, CEO WAP emails a copy of the changed requirements to the Program Director of each subgrantee and requests that each Director send back an email stating that they have received the updated requirements. In addition, CEO WAP staff update the control copy on CEO WAP online database with the updated information so that all subgrantees have access to the most recent standards.

**CEO WAP TECHNICAL STAFF TRAINING:**

CEO WAP Technical Staff maintain the highest levels of training in DOE and industry standards in order to ensure quality and consistency in reviewing subgrantee work. CEO WAP Technical staff are required to hold a QCI, Asbestos Building Inspector (ABI), and Renovation, Repair, and Painting (RRP) certification from the Environmental Protection Agency (EPA), and an OSHA 30 certification. In addition, CEO WAP Technical staff may have other certifications that assist in their ability to perform QA inspections of subgrantee work. The CEO WAP Technical staff members doing Quality Assurance inspections meet the certification requirements as outlined above.

**PERCENT OF OVERALL TRAININGS**

Comprehensive Trainings: 33.1%  
Specific Trainings: 66.9%

**BREAKDOWN OF T&TA TRAINING BUDGET**

Percent of budget allocated to Auditor/QCI trainings: 23.8%  
Percent of budget allocated to Crew/Installer trainings: 44.7%  
Percent of budget allocated to Management/Financial trainings: 31.5%

**V.9 Energy Crisis and Disaster Response Plan**

The purpose of the CEO WAP Disaster Relief Plan is to provide weatherization emergency services to low-income individuals and families affected by a disaster as determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency. The disaster generally involves the following phases: the crisis itself, cleanup, and repair or rebuilding of the area. It is not uncommon for weatherization work to be suspended during the crisis and early cleanup period until such time as community services including electricity, water and other infrastructure can be restored. The plan will be in effect dependent upon the anticipated recovery period.

Disaster relief services are only available to qualified low-income residential households directly affected by the declared disaster. Local agencies are required to identify and provide weatherization assistance to elderly persons, persons with disabilities, families with children 5 and under. However, in the case of a declared disaster, households located in the disaster area can take top priority as long as the households are income eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster. Local authorities must deem the dwelling unit salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation.

For qualified households, the unit allowance will be a maximum of \$6,500 as permitted by DOE WPN 12-07.

DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster are not allowable. Allowable expenditures under WAP include:

1. The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective and
2. The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials. To the extent that services are in support of eligible

weatherization (or permissible re-weatherization) work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.

3. Guidance under WPN 17-7 will determine the allowability of installed Health and Safety Measures for affected homes in the disaster area.
4. Applications will be taken to determine and verify eligibility for potential low-income individuals affected by the disaster. Reporting will be the same as normal requirements with notes indicating in the comment section the unit was weatherized as a result of the disaster. All measures must be cost justified using the DOE approved energy audits, i.e. NEAT/MHEA with a SIR of 1.0 or greater. Incidental repairs can be made to preserve or protect a measure and should be cost justified within the measure(s) identified in the assessment per DOE guidance WPN 12-9. Any unusual circumstances will require the pre-approval of CEO WAP staff and possibly pre-approval of DOE.
5. Any low-income qualified home damaged by disaster such as flooding can be re-weatherized without regard to the date of weatherization, if the damage to materials is not covered by insurance.
6. All remaining measures are to be installed in order of priority in accordance with the CEO WAP Policies and Procedures for managing the Low-Income weatherization program.
7. Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to 2 CFR 200 rules. Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local subgrantee weatherization files, records and the like during the initial phase of the disaster response. Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of the disaster is not allowable.