






Proposed WAP FY22 (PY21) State Plan

ANNUAL FILE

- **IV.1 Subgrantees**

Subgrantee (City)	Planned Funds/Units	Action
Fry Plumbing and Heating Non-Profit (Washington, DC)	\$413,206.88 88	 
Greater Washington Urban League (Washington)	\$103,301.72 22	 
Total:	\$516,508.60 110	

- **IV.2 WAP Production Schedule**

		Units
Weatherization Plans		
Total Units (excluding reweatherized)		110
Reweatherized Units		0
Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	110
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	110
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$0.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	110
H	Average Program Operations Costs per Unit (F divided by G)	\$0.00
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$0.00

- **IV.3 Energy Savings**

Method used to calculate savings(new): [Edit](#)

WAP algorithm Other (describe below)

i	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	110	29.3	5,362
Prior Year Estimate	183	29.3	5,362
Prior Year Actual	80	29.3	0

[Edit the full text](#)

Method used to calculate savings description

The total number of units to completed with the operations funds from DOE WAP funds multiplied by 29.3MBT

- **IV.4 DOE-Funded Leveraging Activities**







The Department of Energy and Environment (DOEE) is requesting 14.99% of leverage funding (\$112,474.00 for personnel and fringe benefits). These funds will be used to cover a portion of the salaries for program personnel who work on partnerships, agreements, and identifying other funding streams to leverage U.S. Department of Energy (US DOE) funds. DOEE has established partnerships with the DC Sustainable Energy Utility (DC SEU) to supplement costs for mechanical systems in multifamily buildings; the DC Department of Housing and Community Development (DHCD) to address roof repair issues; and the U.S. Department of Housing and Urban Development (HUD) to assist with installing healthy housing measures. As the leveraged projects are completed, they will be reported on the QPR in the comments section. The budget does not include funding for measures not associated with a Savings to Investment Ratio (SIR).

For the past two decades, US DOE has strongly encouraged subgrantees administering WAP to be innovative in attracting other resources into the program. The goal of the leveraging initiative is to maximize the number of low-income households that can be served and/or install additional cost-effective measures. Like many WAP programs, DOEE uses a combination of federal funds (e.g., WAP funds, Low-Income Home Energy Assistance Program (LIHEAP) funds, and Community Development Block Grant Program (CDBG)) and nonfederal funds (e.g., utility investments from systems benefit charges or efficiency programs, state funds from special set-asides, other rehabilitation funds, private funds from landlord contributions or foundations, and other private sources) to accomplish the scope of work on a building.

DOEE is aware of the limited amount of funding we receive from US DOE; however, we have made every attempt to maximize those funds by obtaining funds from other resources.

- In FY17, DOEE was able to secure \$1.7M to address remaining measures at a DC Housing Authority property that focused on baseload measures (window air conditioning units, straps for the units to address egress requirements, and window replacement). DOEE was also able to leverage \$1M in local renewable energy development funding (REDF) to prepare the roof at a DC Housing Authority property for solar PV installation.
- In FY18, DOEE was able to offset the costs for heating systems by receiving \$6,000 in rebates from DC SEU, \$1,000 in donations from Community Forklift to address measures not funded by US DOE and LIHEAP, \$100,000 from DHCD to address health and safety measures in two clients' homes, \$400,000 in local REDF to install a solar PV system at a District of Columbia Housing Authority property, and \$1,000 in plumbing work from a local plumber.
- In FY19, through our partnership with Community Forklift, DOEE was able to address clients that previously would have been deferred due to clutter and missing drywall. DOEE created partnerships with local nonprofits that provided the following services to weatherization clients at no cost to the program: clutter removal, mold remediation, stormwater management, and lead abatement.
- In FY20, DOEE continued its partnership with DC SEU, DHCD, Community Forklift's Home Essentials Program, and Yachad's Single Family Home Repair Program. DOEE has leveraged over \$200,000 in heating system installations in four multifamily buildings, addressed health and safety measures in a multifamily building, and leveraged over \$60,000 to address rehab work and materials for clients that would have been deferred otherwise.
- In FY21, DOEE has leveraged \$189,033.00 from Washington Gas Light Company to install higher efficiency gas appliances in low income residences receiving weatherization service and \$600,000.00 from the District's Sustainable Energy Trust Fund (SETF) to address audit-recommended baseload measures in single family dwellings and as part of the District's Clean Energy Omnibus Act which requires that a certain amount of funding be set aside for low-to-moderate income households.

- **IV.5 Policy Advisory Council Members**

Policy Advisory Council Member	Action
Gene Solon	 
Henry Presente	 
Jason Reott	 
Laura O'Connell	 
Margaret Moskowitz	 
Paula Miller	 
Delmonica Glaze	

- **IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF424)**

The Department of Energy and Environment (DOEE) posted the notice in the DC Register on April 23, 2021, with the Proposed State Plan being made available to the public on DOEE's

website on May 3, 2021 for comment. The Public Hearing will be held on May 10, 2021 via teleconference, and informational sessions were held on April 18, 2021 and April 24, 2021.

- **IV.7 Miscellaneous Issues**

Based on our interpretation of the original American Customer Satisfaction Index, DOEE implemented changes to key areas of improvement such as requiring 100% in progress inspections, not only to check the quality of the work performed but to analyze if contractor personnel have the equipment and certifications to perform the work based on the DOEE approved Field Guide, which incorporates the SWS.

MASTER FILE

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

The Department of Energy and Environment (DOEE) defines low-income households as those whose occupants have a current gross income at or below 200% of the Federal Poverty Level or 60% of the District's median income, whichever is higher, as determined under the Weatherization Assistance Program (WAP) eligibility guidelines.

- Describe what household eligibility basis will be used in the Program:

DOEE will weatherize dwelling units whose occupants are income eligible as described above. Applicants who do not meet the income guidelines may receive weatherization assistance if they or any member of their household meet categorical eligibility by receiving Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF). Applicants must provide proof of income for all household members, which may include: a recent payroll stub or other proof that shows current gross income for the last 30 days and is valid within the last 90 days (e.g., documentation showing income from the Social Security Administration, unemployment insurance, pension funds, disability); proof of current address (e.g., rent receipt, lease or deed, property tax bill); proof of total members living in the household (e.g., birth certificates, school records); Social Security Card (or documents with Social Security Number, such as a pay stub or birth certificate; or for qualified aliens documents with alien number such as a permanent resident card) for all persons living in the household; proof of U.S. citizenship or permanent residence; and valid photo identification. These requirements are utilized for single and multifamily dwellings. Application eligibility expires 12 months from certification date if work on dwelling unit (energy audit) has not been initiated.

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

The process of determining eligibility for weatherization services begins with clients submitting the necessary documentation to confirm household composition, household income, and sources of income received. DOEE follows Federal requirements and ensures that services are provided only to U.S. citizens or qualified aliens.

“Qualified aliens” are defined in Section 431 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), commonly known as the welfare reform law. The PRWORA covers the larger groups of legal immigrants (legal permanent residents, refugees, asylees, individuals paroled into the U.S. for at least one year, individuals whose deportation has been withheld, individuals granted conditional entry, and certain individuals who are victims of domestic abuse). Qualified aliens are eligible to receive assistance and services, so long as they can provide the following documents: photo identification, proof of Social Security number or alien number, proof of household income, and utility bills.

DOEE’s services are in full compliance with Federal provisions related to verification of qualified alien status. DOEE’s procedures for verifying applicants’ U.S. citizenship or immigration status are in accordance with the United States Department of Justice’s (US DOJ) Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, published November 17, 1997 (62 FR 61344).

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

- Procedures to determine that units weatherized have eligibility documentation:

Once the applicant is certified as income-eligible for weatherization based on income and/or household demographics such as categorical eligibility, homeownership is verified through the District of Columbia’s Office of the Chief Financial Officer’s (OCFO) Real Property Tax Database. The applicant’s address is also researched to ensure that they have not received Weatherization Assistance since 1994 and to determine if the property is classified as historic through the District’s Office of Planning Property Quest Database. If the applicant resides in a rental property, an agreement signed by the landlord must be submitted. In addition, the owner is contacted to verify the signature on the application.

Verification of household income and WAP eligibility are recorded as part of the client’s file, with application eligibility expiring 12 months from the certification date if work on dwelling unit (energy audit) has not been initiated.

- Describe Reweathering compliance:

Section 1011(h) of the Energy Act of 2020 amended 42 U.S. Code § 6865(c)(2) and removed the reweatherization date of September 30, 1994 to create a ‘rolling’ option. Dwelling units weatherized (including dwelling units partially weatherized) under this part, or under other Federal programs (in this paragraph referred to as ‘previous weatherization’), may not receive further financial assistance for weatherization under this part until the date that is 15 years after the date such previous weatherization was completed. This paragraph does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under this part or under other Federal programs, or from receiving non-Federal assistance for weatherization.

Re-weatherization is also allowed under 10 CFR 44.18(e)(2)(ii) if a “dwelling unit has been damaged by fire, flood, or act of Nature and repair of the damage to weatherization materials is not paid for by insurance.”

As required by the 2021 Application Instructions (V.1.2), applicants for the Weatherization Assistance Program are vetted by DOEE to ensure that inappropriate re-weatherization does not happen, to be expanded to other Federal programs that provide ‘weatherization’ activities. When the customer is contacted to schedule an energy audit: (a) they are asked if they have ever received services from DOEE or any other government entity; and (b) their address is matched in the DOEE weatherization database.

All units to be re-weatherized must have income and building eligibility prior to any work.

- Describe What Structures are Eligible for Weatherization:

Only single and multifamily dwellings are eligible for weatherization assistance using U.S. DOE funding. DOEE exercises caution in dealing with nontraditional type dwelling units such as shelters, and apartments located over businesses to ensure that they meet program eligibility requirements. In a case in which DOEE determines that such a unit is eligible for weatherization, a request for approval will be sent to the U.S. DOE Project Officer before commencing weatherization activities.

In a case in which DOEE is aware of pending redevelopment, the dwelling(s) will not be weatherized. DOEE determines the payback timeline for each measure.

DOEE will adhere to the restrictions of the Historic Preservation Programmatic Agreement (PA) with the DC State Historic Preservation and US DOE executed on November 6, 2020.

- Describe How Rental Units/Multifamily Buildings Will Be Addressed:

DOEE follows 10 CFR 440.22 when addressing rental units and multifamily buildings. DOEE strictly follows U.S. DOE requirements of WPN 16-5 and 17-4 in determining the eligibility of multifamily buildings for weatherization. Building eligibility will be addressed per the 66%, 50%, and HUD lists. Multifamily structures must contain, at a minimum, 66% low-income dwelling units. DOEE completes the income verification process through our LIHEAP program or, if it is a HUD-approved site, the property owner or authorized agent completes the HUD self-certification form as outlined in WPN 17-4.

Multifamily buildings must also have an agreement in place that prevents management from raising rents for at least two years based solely on the increased value of the dwelling unit(s) due to the WAP improvements. Owners of rental dwelling units are required to make a minimum contribution from 1%-10% of the total expected costs for the installation of audit-recommended measures. If leveraged funding is not available, owners are required to buy down any recommended measures to be installed from the audit that do not have Savings to Investment Ratio of at least 1. The required owner contribution can be funds allocated for additional weatherization services or proof of significant weatherization investment within the past year.

In cases where single-family dwelling units are occupied by renters, the renter must meet the eligibility requirements before weatherization work can commence. The owner of the dwelling unit must enter into an agreement that prevents raising rents based solely on WAP improvements. Owners may be required to contribute up to 10% of the WAP allocation for weatherization services.

Subgrantees must develop and maintain procedures for appeals which include instructions for informing applicants and clients of their right to appeal, as detailed in Section 2.10.1 of the EECB Manual, and a procedure for negotiating the dispute prior to an appeal, including a timely negotiation which does not preclude the right to appeal. For rental units the owner of the unit will be kept notified if they are not the complainant. Subgrantees are encouraged to include provisions in the procedures that allow for a review of the decision by the project coordinator (if the project coordinator did not make the initial determination which is appealed) and the executive director of the subgrantee. Subgrantees must include, at a minimum, the following elements in their appeal procedures:

1. The client or applicant must log a complaint with the subgrantee's project coordinator;
2. The subgrantee must review the client complaint and any documentation pertaining to the client case and make a decision;
3. The subgrantee must send a copy of their decision to the client, EECB Chief, and Program Specialist
4. If the client does not agree with the subgrantee's decision, a request for appeal to DOEE must be submitted in writing to the EECB Chief and Program Specialist within thirty (30) calendar days of receipt of the subgrantee's decision;
5. Upon receipt of the request for appeal, DOEE will provide a copy of the request to the subgrantee whose decision has been appealed;
6. The subgrantee will be required to supply any documents relevant to the decision within seven (7) calendar days of receipt of the notice of the appeal by DOEE;
7. DOEE will forward the client complaint to the Office of General Counsel (OGC) and any other relevant parties;
8. DOEE will review the request for appeal and any supporting documents and will respond in writing to the applicant or client within thirty (30) calendar days of DOEE's receipt of the appeal; and
9. If the client is dissatisfied with DOEE's decision, they may appeal to the Office of Administrative Hearings (OAH) or the court system and may include additional documentation appropriate for review.

If a client or applicant contacts DOEE directly with a complaint the following procedures will take place. DOEE will:

1. Log the client complaint on a client complaint form;
2. Schedule a site visit and/or obtain necessary documentation pertaining to the complaint from the client;
3. Assign the originating Energy Inspector to review documentation and/or prepare the necessary report based on the site visit and submit this information to the EECB Program Specialist;

4. Assign the EECB Program Specialist to notify the subgrantee that DOEE received the complaint;
5. Request the subgrantee forward DOEE all documents pertaining to the client file including correspondence, pictures, etc., within seven (7) calendar days of when the subgrantee was notified of the complaint;
6. Review all relevant documents pertaining to the client;
7. Provide notice of a decision to the client and the subgrantee;
8. Provide the subgrantee with written recommended steps for corrective action;
9. Verify that the subgrantee responds to the client complaint within a specified timeframe; and
10. Verify that the subgrantee sends a statement of findings and a resolution to DOEE and the client within thirty (30) calendar days.

In instances where the renter disagrees or dislikes the material to be installed or installed, the owner has the sole responsibility to resolve the issue.

- Describe the Deferral Process:

Per Weatherization Program Notice 17-7 (WPN 17-7), units are deferred on a case-by-case basis. Reasons for deferral are identified at the time of the energy audit, or before weatherization work commences. If an item(s) listed on the DOEE Deferral Form (#22 attached to SF-424) is noticed before work begins, the client is not allowed to receive any measures from WAP until they address the issue. In addition to DOEE conducting the initial walkthrough, subgrantees are required to perform an extensive walk through of each home to avoid work taking place in a dwelling with deferral concerns.

Deferred clients will receive the DOEE Deferral Form which includes: an explanation of the nature of the deferral including photographic documentation when possible; the client's name and address; contact information for an appeal of the deferral decision; date of the audit/assessment; the date when the client was informed of the potential health and safety issues; and the signature of the Energy Auditor who conducted the audit. The client's signature is also required to indicate that the client understands his or her rights and options.

A copy of the deferral decision is given to the client, and another copy is placed in DOEE's client file. Once the client has resolved the deferral issues, they are eligible to reapply for the Weatherization Assistance Program and a second site visit is conducted to verify compliance.

In a case in which DOEE is aware of pending redevelopment, the dwelling(s) will not be weatherized. To determine the timeframe, we will determine the payback for each measure. For example, if a measure has an SIR of 1 or more and the lifetime of the measure is eight years; we will not address the property if it is slated for redevelopment within that timeframe.

- **V.1.3 Definition of Children**

Definition of children (below age): 18

- **V.1.4 Approach to Tribal Organizations**

The District of Columbia has no recognized tribal organizations.

- **V.2 Selection of Areas to Be Served**

The entire District of Columbia will be served. Eligible properties and residents will receive assistance regardless of location within the District of Columbia.

- **V.3 Priorities**

At this time, DOEE operates on a first-come-first-served basis and has not had to resort to a prioritization list to be able to participate in WAP. If a waiting list arises, DOEE gives preference to households with any one of the following:

- Member(s) over 60 years of age,
- Member(s) with a disability,
- Child(ren) under age 18,
- High residential energy usage, and
- High energy burden.

Additional documentation may be requested prior to energy assessment to confirm priority.

DOEE identifies clients with the highest energy burden to participate in our LIHEAP Assurance 16 Program, where we provide hands-on services to reduce their burden. By doing this, DOEE doesn't need to place a higher point value on clients with high energy burden because we provide one-on-one services to them. Soon, with our new database, DOEE may begin addressing clients based on their priority points.

While US DOE allows an average cost per unit (ACPU) of up to \$7,776 starting July 1, 2021, based on FY21 data as of April 27, 2021 the ACPU for DOEE is \$3,293.27

- **V.4 Climatic Conditions**

In the District, temperature extremes range from below 4 degrees Fahrenheit to 104 degrees Fahrenheit. During the coldest months (December - March), the average temperature differential to overcome is 11 degrees Fahrenheit to maintain a minimal interior comfort level of 65 degrees Fahrenheit. From 1986-2020 there were on average 5,552-degree days in the District, made up of 3,951 heating degree days and 1,600 cooling degree days.

The source of this climate data is the National Oceanic and Atmospheric Administration. (See Attachments)

- **V.5 Type of Weatherization Work to Be Done**

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

DOEE conducts energy audits using a US DOE-approved audit tool in eligible dwellings participating in WAP. After the audit is completed, DOEE prepares and assigns the work order to a subgrantee. The subgrantee begins the Quality Control Inspection Process by conducting a visual inspection to ensure conformity with the work order. The subgrantee reviews the work order, and in collaboration with DOEE Quality Control Inspector (QCI), they monitor work in progress ensuring OSHA, lead-safe, and other requirements are being met. Once the work is completed, the subgrantee conducts an inspection and submits supporting documentation to DOEE stating the property is ready for QCI inspection. The DOEE QCI conducts the inspection and documents whether it is a PASS or FAIL based on the Standard Work Specifications (SWS)

guidance. This information is submitted to the subgrantee for re-work or approval to bill based on the outcome of the QCI. At the end of each quarter, an assessment will be made by the Program Manager and QCI determining if additional training is needed based on the failure rate.

Some of the primary measures to be considered are:

- Air sealing infiltration reduction – infiltration reduction addresses air and heat movement between heated and unheated areas by applying such measures as caulking, foam sealant, insulation, weather-stripping to primary doors and windows, sealing of baseboards, correction of leaks in HVAC duct systems, and other materials as necessary to seal the envelope penetrations of the dwelling.
- Attic insulation and venting - attics will be insulated to R49 if the SIR is equal to or greater than 1. Attics that are insulated must have a dam installed and be vented according to the District's Weatherization Field Guide.
- Heating system efficiency improvements - HVAC systems are to be tuned up, as needed, to improve efficiency and indoor air quality. Should a dangerous health or safety condition exist as determined by a DOEE inspector with HVAC expertise, replacement rather than repair may be deemed necessary. In other cases, if age and condition of the system warrant, replacement rather than repair will be considered via a cost/benefit analysis. Whenever possible, 90+ heating units and a minimum of 16 SEER central air conditioners are installed.
- Insulation of domestic water heater - domestic hot water heaters will be insulated if required, and the hot water pipes extending from the water heater will be wrapped for a distance of at least six feet from the water heater, or, if exposed, the entire hot water line.
- Basement/floor/crawl space insulation - unheated basements will be insulated to R19. A vapor barrier will be installed where needed. Adequate ventilation will be provided for insulated basements and crawl spaces. For insulated basements within the building envelope, ventilation should be to the interior of the structure and not outside the envelope.
- Pipe and duct wrap - hot water pipes and hot air heating ducts located in unconditioned areas will be insulated.
- Storm windows – the installation of storm windows on primary windows between heated and unheated areas will be considered.
- Refrigerators - the National Energy Audit Tool (NEAT) includes a refrigerator replacement measure. NEAT can evaluate the potential savings obtained from replacing the existing refrigerator with a newer, more efficient unit. We will use the NEAT as our auditing tool and EPA guidelines for Energy Star Appliances to recommend refrigerator replacement. When refrigerators are replaced, subgrantees must provide a decommissioning certificate as evidence of proper disposal of the existing refrigerator. Replacement of through-the-door icemaker refrigerators or standalone freezers is considered.
- Central air conditioners – Air conditioners rated at 16 SEER or higher may be installed. New air conditioners use 30-50% less energy to produce the same amount of cooling as air conditioners made in the 1970s would. Even if the air conditioner is only ten years old, a customer could save 20-40% of cooling energy cost with a newer, more efficient model. This measure may also be considered under Health & Safety measures.

- Water heater replacement - the NEAT will evaluate the cost-effectiveness of replacing an existing water heater with a higher efficiency model. This measure may also be considered under Health & Safety measures.
- Lighting – new LED lighting systems will be considered. The use of new lighting technology can reduce the lighting energy use in homes by 50-75%.

The work covered by WAP will be performed as needed in homes that are otherwise in sound repair. In some cases, extreme conditions exist (such as roof deterioration or plumbing related failures in heating distribution systems) which must be corrected before the U.S. DOE-funded measures can be justified.

Per 10 CFR 440.18(c)(ii) and 440.20, low-cost/no-cost weatherization materials may be distributed to eligible clients. These measures are intended to be installed by clients and serve them until such time that regular WAP weatherization measures can be installed by subgrantees.

All completed work will comply with: DOEE's U.S. DOE-approved energy audit tool, Appendix A, DOEE's weatherization field guide, the Standard Work Specifications (SWS), and any/all other applicable federal or state requirements. All subgrantees will receive a copy of the DOEE Field Guide titled Standard Work Specifications Field Guide for Single-Family Homes (Guide) during the annual Energy Kickoff Meeting. Subgrantees must follow the Guide's weatherization standards when installing an energy efficiency measure which incorporates the SWS of U.S. DOE's Weatherization Program Notice (WPN) 15-4, Section 2. Subgrantees will acknowledge receipt of the Guide and agree to provide a copy to their subcontractors and in-house crews before they begin any weatherization work.

During the monitoring visit, subgrantees are required to submit to DOEE a copy of their subcontractors and vendor agreements to ensure contractors are aware and in compliance with U.S. DOE technical requirements and specifications of work. Work orders for the single and multifamily dwellings incorporate the SWS for each measure.

DOEE provides subgrantees with the technical requirements for fieldwork including audits and testing; installation of energy conservation, incidental repair, and health and safety measures; and final inspections. The subgrantee confirms receipt of those requirements and provides follow-up and clarification upon request. The subgrantee provides the same documentation to all contractors, subcontractors, and in-house personnel performing tasks in the Weatherization Assistance Program.

DOEE verifies that the technical requirements are communicated, and the specifications for work to be inspected will be referenced in subgrantee contracts. Contractors hired by the subgrantee will have agreements that include the same technical requirements referenced above. The work of the subgrantee and contractor are required to be consistent with the DOEE and U.S. DOE standards and field guides.

The signed contracts must be submitted to DOEE during or before DOEE management's yearly monitoring visit to each subgrantee to ensure DOEE's continued compliance with the U.S. DOE's Program Year 2021 requirements.

DOEE Field Guides for Single-Family Dwellings and Multifamily Dwellings are currently being reviewed by the United States Department of Energy. Our goal is to have the Field Guides approved before the new program year.

A U.S. DOE-approved audit will be conducted on each eligible dwelling by a qualified DOEE energy auditor. National Energy Auditing Tool (NEAT) audits are completed for all single-family dwellings. Audit recommended measures are prioritized according to Savings to Investment Ratio (SIR) rankings. DOEE's QCI inspector also conducts in-progress inspections to ensure measures installed are done in sequential order; Health and Safety, Air Sealing and Insulation, General Heat Waste and Baseload, etc....

The audit process includes a pre- and post-blower door reading and ensures that every participating home is given the best possible recommendations for energy conservation. DOEE ensures that each energy audit meets U.S. DOE guidelines and is performed by a qualified energy auditor. The purpose of the audit is to determine the most cost-effective energy saving measures for each dwelling unit. Targeted Retrofit Energy Analysis Tool (TREAT) audits are completed for all multifamily buildings with five or more units. Audit-recommended measures are prioritized according to SIR rankings.

○ **V.5.3 Final Inspection**

U.S. DOE requires that every dwelling unit receives a final inspection before being reported as a completed unit. U.S. DOE also requested (per Weatherization Program Notice 15-4) that by the beginning of the U.S. DOE 2015 Program Year, all units reported to U.S. DOE as completed will have been inspected to ensure compliance with the specifications outlined in the Standard Work Specifications (SWS), and all quality control inspections, including final inspections and monitoring inspections, must be conducted and signed off on by a Building Performance Institute (BPI) certified Quality Control Inspector (QCI).

DOEE program operates differently than other jurisdictions/states. A DOEE BPI certified Energy Auditor conducts the initial audit while the subgrantee conducts a pre-inspection prior to commencing work to ensure all possible energy efficiency retrofits have been identified. Based on this post inspection if there are no additional retrofits the subgrantee identifies and assigns contractors to complete the work. The contractors notify the subgrantee of their work dates so that the an in-progress inspection can be conducted. The purpose of the in-progress inspection is to confirm that the contractors are installing measures in sequential order and are complying with all Occupational Safety and Health Administration (OSHA) and Lead Safe Work Practices.

Subgrantees must provide DOEE with a work schedule to ensure that the following quality control objectives and job tasks are accomplished during DOEE's in-progress inspections:

- **Domain I: Conducting Quality Checks in Process Visual/Sensory Inspections**
 - Task 1: Verify worker compliance with safety rules
 - Task 2: Assure employee professionalism
 - Task 3: Address work problems
 - Task 4: Evaluate client satisfaction regarding the in-process work
- **Domain II: Conducting Quality Checks Post Work Visual/Sensory Inspection**
 - Task 1: Review client file and the work scope

- Task 2: Perform an exterior and interior visual/sensory inspection
- Task 3: Evaluate customer satisfaction
- Task 4: Determine pass/fail of the work
- Domain III: Conducting Quality Checks Post Work Diagnostic Inspections
 - Task 1: Conduct health and safety tests
 - Task 2: Conduct diagnostic tests
 - Task 3: Identify work problems
- Domain IV: Ensuring Worker Professionalism
 - Task 1: Perform spot checks
 - Task 2: Provide feedback regarding professionalism
- Domain V: Ensuring Program or Project Compliance
 - Task 1: Maintain professional credentials
 - Task 2: Confirm the allocation of public/private funds
 - Task 3: Evaluate installed measures against the field guide, SWS, and state/local codes
 - Task 4: Close out the project
 - Task 5: Maintain files and records

Once the project is completed in its entirety, the subgrantee conducts a Final Inspection and uploads all necessary documentation in QuickBase for DOEE to review. The subgrantee is charged with client education and submits documentation to ensure compliance. DOEE conducts an in-person Final Inspection once all documentation is received. If all work meets DOEE standards, a PASS Final QCI inspection report is generated and the subgrantee receives an email approving payment to the contractor. Once the subgrantee has paid the contractor then they will upload proof of contractor payment and invoice requesting reimbursement for services rendered. This is reviewed by DOEE's Quality Assurance Person and if all documentation meets DOEE requirements a QA form is completed, and the payment request is approved.

QCIs are individuals who were not involved in the prior work as the energy auditor /assessor or as a member of the crew. All work orders are generated to include the specific corresponding SWS as an extra assurance that the subgrantee, subcontractor, and in-house crews install measures and perform work according to the standard.

In addition, all subgrantee contracts with their contractors must include the following language to ensure compliance with WPN 15-4: "All measures and incidental repairs performed on client homes must meet the specifications, objectives, and desired outcomes outlined in the Standard Work Specifications for Home Energy Upgrades (SWS)." These field standards must comply with or exceed the minimum standards described in the SWS including audits/testing; installation of energy conservation, incidental repair, and health and safety measures; and final inspections. The contractor must confirm receipt of those requirements and provide follow-up and clarification upon request. A signature on a contract/award can serve as proof of receipt.

As part of DOEE's agreement with the subgrantee, they are required to ensure their contractors adhere to the guidance as outlined in the U.S. DOE approved Field Guide and SWS Alignment and attend required training as outlined on the training plan.

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

Since the inception of the Weatherization Assistance Program, DOEE has utilized subgrantees to weatherize over 10,000 dwelling units in the District of Columbia. Subgrantees have played an integral part in the success of the weatherization program due to their many years of experience in residential energy efficiency improvement.

To keep an updated evaluation of each subgrantee, DOEE utilizes Quickbase to monitor:

1. Number of homes completed,
2. Number of applications pending,
3. Number of homes in progress,
4. Contract amount,
5. Total funds expended,
6. Balance of funds, and
7. Special comments.

DOEE currently maintains the monitoring files, which include all the subcontracts and related information from which staff can obtain a current and complete financial picture.

Subgrantee performance is reviewed both periodically and at the end of the program year. In addition, we conduct weekly conference calls beginning in the third quarter to ensure program timelines are met.

DOEE, through the Energy Efficiency and Conservation Branch (EECB), places great emphasis on ensuring that the Weatherization Assistance Program is effective and efficient at all levels. DOEE conducts training and monitoring activities on an ongoing basis to evaluate subgrantees' procedures, quality of work, and overall program management. Through this process, DOEE can adequately assess the training needs of subgrantees' staff and subcontractors.

DOEE requires subgrantees and their contractors to attend U.S. DOE conferences and trainings, and WAP-run management and customer education training. The subgrantee must prove and maintain the supporting documentation that all field workers have successfully completed the required training as outlined in our Grant Award Documents.

The subgrantees are local, so there are no U.S. DOE funds budgeted for monitoring purposes. DOEE will utilize District Government Fleet vehicles at no cost to U.S. DOE. The program staff that conducts the field, programmatic, and financial monitoring are currently being paid through other funding sources.

In an effort to monitor the work being completed by the subcontractors, EECB staff conduct in-progress inspections for all program participants, ensuring work is completed by certified/qualified staff, work is completed in sequential order, and clients are aware of the weatherization measures received.

Through field monitoring, DOEE conducts an analysis of subcontractor/subgrantee's success in achieving or exceeding air infiltration target rates and addressing health and safety concerns.

This is also an opportunity for DOEE to determine if Tier 2 training is needed.

DOEE will strengthen the monitoring process by requiring subgrantees to respond to monitoring reports with findings or numerous or repetitive observations with not only documentation of correction of work deficiencies but also the actions that were taken or planned to ensure that similar deficiencies are not repeated in future weatherization work.

DOEE continues to guide subgrantee weatherization programs in the implementation of the revised procurement policies to ensure subgrantee's procurement is open and competitive. DOEE obtains weatherization pricing for the contractors at a fair market rate based on the current year's market analysis.

DOEE is continuing a comprehensive program evaluation to determine average energy savings of weatherized homes and its program effectiveness. Subgrantees are monitored for their production status monthly utilizing an online application called QuickBase. In addition, at the end of each fiscal year DOEE does an analysis for each subgrantee to determine the energy savings for each project completed.

- **V.7 Health and Safety**

U.S. DOE has mandated that states develop, publish, and implement procedures to allow for the usage of WAP funds for health and safety risk mitigation. Energy-related health and safety concerns are those hazards that are necessary to be removed before, or because of, the installation of weatherization measures. Therefore, health and safety hazards associated with weatherization activities can be removed or prevented with U.S. DOE funds. Measures and costs are defined in the grant award documents to avoid seriously impeding the realization of the primary energy conservation purpose of the program. DOEE will continue to be prudent in our oversight of the funds used by subgrantees for health and safety mitigation on homes weatherized.

DOEE has currently budgeted \$10,000 for health and safety costs from U.S. DOE funding which is an average of \$90.91 per unit using U.S. DOE funding. If the total health and safety costs exceed \$10,000, other funding sources will be used. DOEE will carefully monitor subgrantee expenditures to ensure that the amount allocated to address energy-related Health and Safety is an average cost of \$90.91 per unit. U.S. DOE will always be the second source of funding to address Health & Safety concerns.

Subgrantees and contractors working on homes built before 1978 must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator. DOEE Monitors and Inspectors are Certified Renovators.

Subgrantees must comply with Occupational Safety and Health Administration (OSHA) and Safety Data Sheets (SDS) requirements in all weatherization activities under 29 CFR 1910.1200, the revised Hazard Communication Standard (HCS), and take precautions to ensure the health and safety of themselves and others. Wherever workers or residents may be exposed to

hazardous materials subgrantees, contractors, and subcontractors will develop and maintain a written hazard communication program conforming to 29 CFR 1910.1200. The subgrantee shall ensure that:

- All hazardous chemicals in the workplace are listed,
- All containers of hazardous chemicals are labeled,
- Safety data sheets are maintained for all hazardous chemicals, and
- Workers are informed and trained in program elements, hazards, and protective measures.

Also, subgrantees must adhere to the standards in DOEE's Health and Safety Plan. This is an additional check to ensure that expenditures are allocated appropriately.

A. Grantee Health and Safety (DOEE Staff)

Funds provided under 10 CFR 440.18 of the WAP regulations are to eliminate health and safety hazards, elimination of which is necessary before, or because of, installation of weatherization material. These funds are to be expended by subgrantees for direct weatherization activities.

B. Contractor and Crew Health and Safety (Subgrantees and Contractors)

Subgrantees must comply with Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency (EPA) requirements for all weatherization activities subcontractors, contractors and in-house crews employed by subgrantees are expected to comply with OSHA and EPA. This requirement is a part of the subcontractor's bidding process. Related costs for subgrantees to comply with OSHA and EPA requirements are to be charged under a separate health and safety budget category.

C. Client Health and Safety

DOEE has considered the need to mitigate potential energy-related health and safety hazards occurring in the client's homes. A list of the more common hazards and the preferred approach is discussed below. Other energy-related hazards may be considered on a case-by-case basis. The single most threatening and potentially serious hazards are related to combustion appliances. To address these hazards, DOEE requires energy auditors to test the combustion appliances in a home pre- and post-air tightening. This procedure consists of testing carbon monoxide levels in the flue/vent and near the exhaust of unvented appliances, draft-ability of flues, startup spillage at flues, adequacy of combustion air, and testing for fuel leaks.

D. Remediation Materials

Remediation materials are defined as materials, measures, and equipment necessary to reduce or eliminate existing or potential health and safety hazards. These include:

- Replacement furnace;
- Combustion device vent connector when original is rusted out or unable to safely vent the products of combustion from a combustion device;
- Materials necessary to repair a downspout leaking into a basement and causing moisture, mold, and wood-rotting problems;
- Materials necessary to repair the section of a gutter causing moisture, mold, and wood-rotting problems; and

- Materials necessary to address electrical hazards when the problem prevents adequate weatherization.

Allowed Measure and Estimated Cost:

- Installation/repair of exhaust fans in kitchens and bathrooms by ASHRAE 62.2 protocol: \$709.00
- Correcting/repairing improper or ineffective HVAC venting (such as installing a chimney liner): \$290.00
- Repairing/replacing HVAC units in homes where at-risk, medically certified/necessitated occupants' dwell: \$600.00
- Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions: \$100.00
- Minor correction of moisture and mold creating conditions when necessary to ensure the long-term stability and durability of the weatherization measures and the clients' long-term health and safety: \$100.00
- Minor electrical repairs/upgrades necessary for weatherization measures and where the health and safety of the occupant is at risk: \$300.00
- Gutter or downspout work when necessary to keep rainwater out of the dwelling to stop or prevent moisture/mold mildew conditions per DOE Standard Work Specifications: \$100.00

E. Remediation Costs

The maximum allowable expenditure for remediation of health and safety hazards in the District of Columbia may not exceed \$5,000.00 per residence. This cost is a part of the maximum expenditure allowance. U.S. DOE funds are to be used for energy-related health and safety remediation only. Subgrantees should seek other funding to remediate nonenergy-related health and safety hazards.

F. Reporting Requirements

Related costs for subgrantees to comply with OSHA and EPA requirements are to be charged under a separate health and safety budget category. This policy is issued with the knowledge that as experience is gained in health and safety hazard identification, modifications and improvements to remediation methods will be made.

G. Incidental Repair

Those repairs necessary for the effective performance or preservation of weatherization materials will be addressed. Such repairs include framing or repairing windows and doors that could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, to seal materials installed under this program. Program policies strictly prohibit roof replacements, structural repairs, or other nonenergy-related rehabilitation work. Single family homes requiring this type of repair will be deferred to the District's Department of Housing and Community Development (DHCD) Single Family Residential Rehabilitation Program (SFRRP). All incidental repairs will be justified in the client file along with an explanation for their need and relationship to a specific energy conservation measure (ECM).

H. Subgrantee Health & Safety Allocation

Historically, DOEE has not had to use the allotted 15% percent in health and safety funds due to the leveraging programs (LIHEAP and District general funds) for which health and safety measures can be covered under program operations. All homes are addressed in a holistic manner and cases of an SIR greater than 1, the heating or cooling appliances are covered under WAP Program Operations. When the SIR test is not met, DOEE has covered these measures through LIHEAP and non-federal funds.

I. ASHRAE 62.2

Implementation of ASHRAE 62.2 is required. Client refusal of mechanical ventilation when evaluated and called for according to the standard must be a deferral. DOEE will fully utilize the ASHRAE 62.2 2016 standard possible to meet the minimum requirements for mechanical and natural ventilation intended to provide acceptable indoor air quality in all homes weatherized. The ventilation system may consist of continuously operating bathroom and kitchen exhaust fans, a supply-only system or a balanced system. The required airflow is measured following the installation of the ventilation system to assure the desired airflow has been achieved.

DOEE used the 62.2-2016 Residential Energy Dynamics (RED) ASHRAE Ventilation calculation found here:

<http://www.residentialenergydynamics.com/REDCalcFree/Tools/ASHRAE6222016>

A copy of the ASHRAE calculation is included in each file and sent to the subgrantee.

Ventilation for Multifamily Buildings:

1. Whole building ventilation rates are applied on per unit basis;
2. No infiltration credit on multifamily buildings;
3. Corridor ventilation of 6 CFM per 100 sq. ft.;
4. All envelope components must be sealed between units;
5. Bathroom or kitchen exhaust fans may also serve as the whole-building ventilation fan if the fan satisfies the minimum requirements for both the local and whole-building ventilation;
6. A single supply fan may serve multiple units if it is continuously operated or if a backdraft damper is included at each unit to prevent cross-contamination;
7. An exhaust rate of 4 CFM per 100 sq. ft. is required for attached common garages with an exemption if two or more walls are open to the outside; and
8. All units must have CO & smoke combination units in the following areas:
 - a. In each bedroom and outside of each separated dwelling unit's sleeping area in the immediate vicinity of the bedroom(s); and
 - b. On every level of a dwelling unit, including the basement.

DOEE has implemented a comprehensive Health and Safety Plan to include allowed incidental repairs. Please refer to SF-424.

DOEE does not approve partial weatherization nor do we reimburse subgrantees until all measures are installed and pass DOEE's QCI inspection. Once the subgrantees submit the

reimbursement documentation, it is cross-referenced with the Funding Source Allocation (FSA) to ensure funding is allocated correctly prior to payment.

- **V.8 Program Management**

- **V.8.1 Overview and Organization**

In Program Year 1994, the District of Columbia's Weatherization Assistance Program (WAP) for low-income households was transferred from the Department of Housing and Community Development (DHCD) to the DC Energy Office. In 2006, under the authority of DC Law 16-51, the Department of Energy and Environment (DOEE) was formed through a merger of the DC Government's Environmental Health Administration, the DC Energy Office, policy functions of the Tree Management Administration and policy functions of the Office of Recycling. The weatherization component operates under DOEE's Energy Efficiency and Conservation Branch (EECB) of DOEE. This agency has accumulated a wealth of experience in operating LIHEAP and WAP weatherization programs. DOEE has utilized proven and effective methods in performing energy audits and has enlisted several subgrantees to implement weatherization activities. Moving forward, DOEE intends to continue to utilize auditing tools (NEAT and TREAT) to enhance program capabilities.

A copy of the Single Audit A-133 is uploaded to the SF-424.

- **V.8.2 Administrative Expenditure Limits**

DOEE adheres to 10 CFR 440 §440.18 (e) which states:

"Not more than 10 percent of any grant made to a State may be used by the grantee and subgrantees for administrative purposes in carrying out duties under this part, except that not more than 5 percent may be used by the State for such purposes, and not less than 5 percent must be made available to subgrantees by States. A State may provide in its annual plan for recipients of grants of less than \$350,000 to use up to an additional 5 percent of such grants for administration if the State has determined that such recipient requires such additional amount to implement effectively the administrative requirements established by U.S. DOE pursuant to this part."

DOEE has determined that the District's subgrantees are not eligible to receive the additional 5%. Fry NP will receive \$29,993.12 while Greater Washington Urban League will receive \$7,498.28 in administrative funding. Administrative allowable expenditures are defined as expenditures incurred by the subgrantee that are necessary to fulfill the requirements of this grant, excluding the direct costs to weatherize dwelling units. Administrative costs must not exceed 10% of the total grant award and must be actual and allowable under applicable federal regulation(s). Administration costs include expenses incurred to provide the services required under the terms of the grant. These include telephone costs; salary and fringe benefits of professional, administrative, fiscal and inventory staff; copying; office space; equipment; and supplies.

○ **V.8.3 Monitoring Activities**

As stated in the U.S. DOE Weatherization Program Notice (WPN) 20-4: Weatherization Assistance Program Monitoring Procedures, the goal of the monitoring process is to: (1) ensure the proper and timely use of funds and the realization of expected benefits, (2) provide transparency and accountability, (3) provide quality control, and (4) provide technical assistance and training.

The goals for DOEE's monitoring activities include:

- Conducting monitoring with consistency, fairness, respect, and timeliness in a constructive and professional manner;
- Fostering positive, open, and constructive working relationships and provide an educational experience that promotes interaction, feedback, and improvement for both DOEE and the subgrantees of the Weatherization Assistance Program;
- Optimizing program funds and resources to best serve the District's low-income population, striving for program improvement, and providing the most cost-effective and best quality program services possible;
- Providing programmatic and technical assistance, reinforcing strengths, and sharing successes, innovations, best practices, and experiences encountered by other subgrantees; and
- Providing reporting that is consistent with, and based upon, adopted program policies, procedures, and standards from U.S. DOE.

Monitoring activities are performed by the Program Manager, Budget Analyst, and Branch Chief periodically throughout the year with a portion of their salary being paid utilizing U.S. DOE and other funding sources. The QCI inspector who conducts all field monitoring activities is paid 100% by another funding source. Since the subgrantees are local, budgeted funds are not required for monitoring purposes. DOEE will utilize District Government Fleet vehicles at no cost to the U.S. DOE grant.

Annual Monitoring

DOEE is required to monitor all subgrantees at least once per year in accordance with 10 CFR Part 440. Prior to the monitoring visit, DOEE's On-Site Monitoring Checklist is shared with the subgrantee. During the visit, the checklist is used to verify the various documents and materials provided by the subgrantee. Both programmatic and fiscal documents and materials are reviewed. A written report is issued to the subgrantee within thirty (30) days of the monitoring visit. The report includes the following categories: findings, concerns, recommendations, and best practices.

A finding may be an observation of non-compliance with federal regulation, or a repeated or previously identified unaddressed correction or concern. Examples include the misuse of funds, inadequate inventory control, illegal procurement, and insufficient insurance.

A concern is either a violation of guidance that is not a regulation, or a correction of a minor problem. Examples include file omissions, failing to follow the State Plan, changes to policies and procedures, and improper training of staff.

Recommendations are suggestions to improve the merits of the program or the identification of opportunities for training and technical assistance (T&TA) or guidance. Improvements or commendations may be noted under recommendations if corrections have been made since the last monitoring visit.

The best practices category notes unique ideas and implementation practices that could potentially be shared with other network partners.

If there are findings, the relevant federal regulation, weatherization program notice (WPN) guidance or the grantee's award documents are cited. The subgrantee has 30 days to provide a written Corrective Action Plan (CAP) to DOEE. Corrective actions may also be requested for any concerns identified. For subgrantees with findings, additional monitoring visits may be scheduled. Files are maintained for all monitoring visits and are available for review by U.S. DOE.

The monitoring visit will include, but not be limited to, the review and verification of documentation, implemented procedures, and EECB program operations to help eliminate fraud, waste, and abuse.

Reported expenditures are monitored by comparing periodic expenditure report to a subgrantee's books and records, such as:

- Reporting and documentation of program income and leveraged funds;
- Subgrantee financial statements;
- Source documentation for the purchase of any items charged against DOEE-provided funds;
- Distribution of costs charged to more than one program;
- Payroll costs for consistency with the latest approved budgets;
- Records to trace material purchases from invoices to inventory, or to specified jobs and to programmatic reports;
- Bid procedures and records;
- Subgrantee agreements, analyzing payment schedules to verify payments made to contractors, subcontractors, and vendors;
- Contractors' cash balances;
- Subgrantee's internal control structure;
- Subgrantee's compliance with insurance requirements; and
- Subgrantee's safeguarding of fixed assets.

Each subgrantee must provide the EECB Program Manager or Branch Chief with copies of the following weatherization documents five (5) days prior to the monitoring visit:

- Contractor, subcontractor, and vendor agreements;
- Lease agreements;
- Bids, solicitations for bids, notifications of bid awards, and vendor lists; and
- Books of account, including:
 - Cash disbursement;
 - Cash receipts;

- Payroll sheets or ledgers;
- General ledgers;
- General journals;
- Monthly general ledger trial balances;
- Monthly reconciliation to budget;
- Checking account reconciliations;
- Bank account authorization signature cards;
- List of all unpaid bills tied to the appropriate budget line item for which the cost was incurred; and
- Invoices for purchases made with grant funds, program income, and leveraged funds, if applicable.

Periodic Monitoring

In addition to the Annual Monitoring, the subgrantee and subcontractors review production, identify obstacles and challenges then develop solutions, identify best practices to meet timelines, and make everyone aware of new mandates and program protocols.

DOEE performs monthly in-person or if necessary virtual monitoring reviews of the subgrantee's programmatic and field operations. All findings from periodic monitoring reviews will be reported to appropriate DOEE staff and the funding project officer monthly unless the findings need to be reported immediately to U.S. DOE due to their egregious nature.

The EECB Program Manager will inform the subgrantees of program findings and will require corrective responses in writing. Depending on the severity of any problems reported, a subgrantee may receive a follow-up monitoring review that concentrates on prior deficiencies and required corrective actions. Severe problems will be reported to appropriate DOEE staff and to the U.S. DOE funding project officer. Work may be terminated based on consultations with DOEE and U.S. DOE.

Field Monitoring

Field Monitoring is conducted by DOEE's Home Energy Professional (HEP) Certified Quality Control Inspector throughout the year for each subgrantee. Individual job inspections are performed and recorded using the Post Installation Inspection Form. Jobs will be inspected for overall effectiveness, workmanship, appearance, and compliance with DOEE's Field Guide. An overall assessment of the subgrantee's field practices are performed using the Standard Work Specification (SWS) Guidelines developed by the National Renewable Energy Laboratory (NREL) and U.S. DOE.

Subgrantee Inspection Responsibilities

Subgrantees are required to inspect 100% of all completed dwelling units to determine compliance with the EECB Programs' quality standards and to ensure proper documentation of client information, job measures and costs, and other appropriate information as needed. The

post-installation inspection must be performed by a person who did not perform the actual work on the job.

Although the subgrantee is required to inspect 100% of the completed projects, DOEE will be the one responsible for conducting 100% of the in progress and QCI inspections. The QCI inspections are conducted by a DOEE QCI who was not involved in the audit preparation or implementation of audit recommended measures.

Performance Standards

The levels of performance standards include:

1. **High-Performance Standard:** to meet the High-Performance Standard, subgrantees must demonstrate performance standards during the monitoring visit that meet or exceed those commonly observed in the following areas:
 - No more than one health and safety violation as identified in the previous monitoring report;
 - No more than one procedural finding related to program rules, policies, and procedures;
 - No annual program specific audit findings;
 - Accurate monthly reports are always submitted on time; and
 - Subgrantee provides comprehensive service in a cost-effective manner in accordance with U.S. DOE guidelines.
2. **Standard Performance:** to meet the Standard Performance threshold, subgrantees must meet the following Standard Performance requirements:
 - Comply with major program requirements (i.e., lead-based paint procedures, cost allocation plan/indirect rate, and required contractor information);
 - Receive no more than one specific program finding in the annual audit;
 - Ensure that staff is well trained in performance standards and specific job duties;
 - Maintain complete and organized files;
 - Complete all required scopes of work;
 - Ensure that all contractors, subcontractors, and vendors have demonstrated proficiency in technical applications including diagnostics;
 - Comply with all applicable safety rules;
 - Maintain a professional working relationship with DOEE;
 - Resolve all prior findings and report such corrections to DOEE in a timely manner; and
 - Verify that none of the elements identified in the At-Risk Performance category (below) are present.
3. **At-Risk Performance:** DOEE may categorize a subgrantee under At-Risk Performance for serious management and/or sub-standard field performance, including but not limited to the following findings:
 - Unmet program goals;
 - Misplaced or unaccounted-for program resources;
 - Serious indications of misuse of funds, fraud, or theft;
 - Non-compliance with program policies and procedures;
 - Severely incomplete or disorganized files or records;

- Repeated major field findings with little to no improvement over a previous monitoring visit; and
- Delayed or unresponsive behavior regarding DOEE requests and deadlines.

Once a subgrantee has been designated with an At-Risk Performance status, DOEE will provide specific improvements that must be made by the subgrantee. The subgrantee will be instructed to submit a plan to identify the steps and timelines to be taken to make the noted improvements. When appropriate, related training and technical assistance will be provided by DOEE.

If the specified improvements in management or field practices are not instituted by the subgrantee within a specified period, DOEE will consider suspension or termination of the subgrantee agreement. DOEE will report At-Risk subgrantees to U.S. DOE immediately.

Appeals of Monitoring Reports

A subgrantee may appeal the findings of a DOEE Monitoring Visit to the EECB Branch Chief. This appeal should be sent in writing within thirty (30) days of receipt of the inspection report.

A subgrantee may submit a subsequent appeal to the Affordability and Efficiency Division Associate Director.

- **V.8.4 Training and Technical Assistance Approach and Activities**

Training and Technical Assistance (T&TA) activities are intended to maintain and increase the efficiency, quality, and effectiveness of the Weatherization Program at all levels. DOEE developed an internal Subgrantee Training Plan based on U.S. DOE recommendations, monitoring visits, and field inspections. The Training Plan ensures that all Tier 1 training paid for with T&TA funds for the subgrantee meets the requirements of Weatherization Program Notice 15-4, Section 4.

DOEE links subgrantees to training resources throughout the year on a variety of energy-related topics. When topics involve a change in existing policies and procedures (e.g., new database, changes to audit protocols), or emphasize a major program area, subgrantee attendance may be mandatory. When training is mandatory, all parties are expected to assign the most appropriate person to attend. If a subgrantee has any doubt regarding attendance, DOEE requires that it be consulted immediately.

DOEE requires subgrantee staff in key positions to have or obtain the proper training and certifications as outlined in their grant award notice(s). If a subgrantee hires a new employee into one of these positions or a current employee transfers into one of these positions, it is mandatory that if they have not already received it, the employee receives this training within six months of their start date. These mandatory training sessions must be repeated every three years by subgrantee personnel who occupy these positions. The Training Plan requires certification to be submitted 30 Days after the Grant Award Notice.

Based on performance, subgrantee and DOEE personnel may be required to take additional training courses prior to continuing weatherization activities. An analysis will be conducted to determine if the work performed did not meet the standard based on a “one-time” error or if a pattern of poor performance exists. In instances where poor performance is identified as a

pattern, subgrantees are required to complete Tier 1 and 2 training activities within the next 30 days after being informed of the findings.

The selected subgrantee's in-house personnel and/or subcontractors will receive the necessary training to follow DOEE training requirements once the funding becomes available. Community Housing Partners, an IREC accredited facility, will continue to provide subgrantees with the necessary training to stay abreast of any new program guidance and/or updates as needed. The current T&TA budget reflects the projected costs to train subcontractors and in-house subgrantee personnel, so they follow DOEE standards. DOEE's Request for Applications (RFA) outlines the training requirements, and each subgrantee is required to adhere to this by signing their grant award. During the DOEE monitoring visit, DOEE requests the listing of all training their subcontractors and/or in-house crews attended and obtained certification for if they differ from the personnel on board at the time of their proposal submission.

DOEE's program staff will maintain their BPI certifications to ensure compliance. DOEE required all applicants for the FY20 program to have the above training completed before applying for funding. DOEE requires this in its RFA and its Training Plan. DOEE's internal staff currently includes four (4) BPI-certified QCIs.

Leveraged funds have been allotted to provide staff with the necessary training courses, and U.S. DOE's T&TA funds will be utilized to attend U.S. DOE-recommended conferences. T&TA funds may be used to train DOEE staff, subgrantee staff, and subgrantee contractors except in cases where the employee has already failed the certification test. T&TA funds will not be used to retake the exam and the employee is required to cover the cost and obtain required certification within the same fiscal year of failed exam/test. In making the determination to pay for contractor training, subgrantees must formally agree with their contractors that, in exchange for training the contractors will work in the DOEE WAP Program for a minimum of one (1) additional program year after training is completed, to align with the cost of the T&TA provided. DOEE requires subgrantees to submit training requests (see Attachments) for approval prior to spending U.S. DOE T&TA Funds.

DOEE offers some training courses. When a subgrantee's staff is unable to attend, they must still meet the requirement for certification within 30 days of the Grant Award Notice.

DOEE determines the subgrantees' effectiveness, skills, and abilities through monthly field and programmatic monitoring activities to compare subgrantee production and determine if additional training is needed. The goal is to determine whether U.S. DOE funds are being used to the maximum extent possible on energy efficiency and conservation measures. The subgrantee is also required to show adequate proof of client education and utilization of leveraging opportunities to address applicants in a holistic approach.

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

The District's Energy Assurance Plan provides information on how the District and DOEE will respond in case of an energy emergency. The Energy Assurance Plan promotes the resilience of the District's energy systems to reduce the system's vulnerabilities. The plan also outlines DOEE's role in promoting policies and programs that enhance the District's energy systems.

The Plan addresses:

1. The types of energy emergencies that can occur in the District;
2. Who responds to an energy emergency;
3. Plan of action when an energy emergency occurs; and
4. Development related to critical infrastructure and promoting policies and program that enhance the resiliency of District energy systems.

If there are any changes or updates, they will be sent to U.S. DOE's Project Officer for review.

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