

Connecticut Department of Energy & Environmental Protection (DEEP)

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Income means cash receipts the applicant earned and/or received before taxes. Income does not include the exclusions identified in the US Department of Energy (DOE) Weatherization Assistance Program (WAP) guidance WPN 25-3. Gross income should be used to determine eligibility, not net income.

All households which contain a member who has received cash assistance payments during the preceding twelve-month period under Titles IV and XVI of the Social Security Act, Pub. L. No 88-452, 42 USC Section 2701 et. Seq or applicable state or local law are eligible for Weatherization Services.

WAP eligibility is also extended to the Department of Housing and Urban Development (HUD) means tested programs as outlined in WPN 22-5.

Describe what household eligibility basis will be used in the Program

The federal definition of low-income is in accordance with 10 C.F.R. § 440.22(a). A household is eligible for weatherization assistance if occupied by a family unit:

- Whose income is at or below 200% of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.
- Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law at any time during the 12 -month period preceding the determination of eligibility for weatherization assistance or;
- Who is eligible for assistance under the Low- Income Home Energy Assistance Act of 1981, provided that such basis is at or below 200% percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

Connecticut WAP (CT WAP) also considers a household eligible for WAP if they are determined

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

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

- Anyone who is eligible for assistance under a HUD means-tested program, is categorically eligible per the guidelines set forth in WPN 22-5 and consistent with 42 U.S Code § 6863(b)(3).
- Anyone who is eligible for assistance under a USDA means-tested program is categorically eligible per the guidelines set forth in WPN 25-4
- Anyone who is eligible for assistance under Connecticut’s Conservation & Load Management weatherization program for low-income persons: Home Energy Solutions – Income Eligible (HES-IE) who has been approved through Options A or B of the 2024 HES-IE application, subject to data availability from the HES-IE program operators is eligible to receive WAP services provided the income threshold for this program is 60% SMI, the same as the income threshold for LIHEAP.

Note: The HES-IE application does not have an asset test. For information about how the HES-IE program performs income qualification, see the HES-IE application [on energizect.com \(2024-2025 HES-IE Application \(English\)\)](https://energizect.com/2024-2025-HES-IE-Application-English).

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

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

Document, I94 with R1 or R2 status designation).

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

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

Subgrantees are required to verify home ownership by contacting the local assessor's office for a copy of the deed. After review, if the client is not listed on the deed or if there are individuals on the deed who are not listed on the application materials, further review by the Subgrantee is required. This additional review may take the form of a client interview in conjunction with a request for back-up documentation verifying the information obtained in the interview. See § 203.6, Proof of Ownership, CT WAP Operations Manual. This process is also relevant to renters. Subgrantees are required to verify income for renters as part of the WAP eligibility process.

All households which contain a member who has received cash assistance payments during the preceding twelve-month period under Titles IV and XVI of the Social Security Act, Pub. L. No 88-452, 42 USC Section 2701 et. Seq or applicable state or local law are eligible for Weatherization Services.

Additionally, verification of income eligibility is completed through a combined application process for CT WAP and CEAP. Once a household has been determined eligible for CEAP benefits, that household is deemed automatically eligible for CT WAP. A client is financially eligible for CEAP if the total, annual gross income of the household is at or below 60% of the state median income, adjusted for household size. Some examples of documentation that would verify eligibility for CEAP include documentation of income (i.e., W-2 forms), documentation of liquid assets (i.e., checking and savings accounts, stocks, bonds, retirement accounts), and proof of receipt of Temporary Family Assistance or other state or federal cash assistance programs. All documentation of income gathered for CEAP or HES-IE eligibility must be verified by CT WAP staff to confirm eligibility. See §§ 201.3, 202, 202.2, CT WAP Operations Manual.

Additionally, all HUD means-tested properties are categorically eligible to receive weatherization services utilizing existing procedures, processes, and documentation to reduce the burden of the low-income household caused by applying and submitting the same income verification documentation to multiple federal programs. CT WAP will work with the Subgrantee network to

create a process to serve all categorically qualified households.

CT WAP will work with DOE and the administrators of the utility managed energy efficiency programs to determine the feasibility of categorically qualifying households to receive weatherization service once they have been means-tested through the HES-IE program.

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

Describe Re-weatherization compliance.

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

CT WAP maintains an electronic database of -homes that were weatherized under DOE WAP, LIHEAP, HUD, and USDA fifteen or less years ago. Subgrantees are provided full access to this information for lookback purposes. The Grantee limits and monitors the number of such dwellings that each Subgrantee may re-weatherize. Homes re-weatherized under WAP, LIHEAP, HHS, HUD, and/or USDA in the past 15 years are not eligible to be re-weatherized in CT.

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

Describe what structures are eligible for weatherization

Most dwellings currently being addressed by WAP in Connecticut are single-family dwellings, both owned and rented. The Subgrantee may not refuse to weatherize an otherwise eligible unit on the basis that it is a rental property. Weatherization services are to be provided to owner-occupied and

rental properties alike with no priority given to either. Applicants from households who are renting must be ranked and verified in the same manner as households owning the property in which they reside. In most circumstances, the owner/landlord can contribute to the cost of weatherizing a rental property. However, financial contributions are never required. The owner/ landlord may choose to contribute to reduce the amount paid by WAP. Doing so can improve the SIR and allow for additional measures to be installed in the unit(s) that may have previously been too expensive to qualify. Mobile homes are eligible for weatherization as well and are reported with the other types of housing stock in the quarterly reports. Caution must be exercised when dealing with non-traditional dwelling units such as shelters, apartments over commercial properties, etc. to ensure that they are eligible. Weatherization of these properties must be reviewed and approved by DOE POs prior to weatherization. Weatherization of non-stationary campers and trailers that do not have a mailing address associated with eligible applicants is not allowed. The use of a PO Box for non-stationary campers or trailers does not meet this requirement.

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

Describe how Rental Units/Multifamily Buildings will be addressed

In Connecticut the Grantee shall ensure all rental units are served in accordance with the 10 CFR § 440.22(b)(3), 10 CFR § 440.22 (c)-(e). To ensure compliance, CT WAP has developed processes and procedures to ensure that:

- Written permission of the building owner or authorized agent is obtained before commencing work;
- Benefits of the services primarily accrue to low-income tenants residing in such units;
- For a reasonable period after completion, the household will not be subjected to rent increases, unless those increases are demonstrably related to other matters than the weatherization work performed;
- Adequate procedures are in place whereby the Grantee can receive tenant complaints and owners can appeal should rental increases occur and;
- No undue or excessive enhancement shall occur to the value of the dwelling unit. A properly executed energy audit with an energy conservation measure (ECM) of 1 or greater would not constitute an undue enhancement.

In Program Year 2025, DEEP will edit the Weatherization Agreement and add language that

requires the property owner to add language to the lease agreement that protects the tenants from rent increases due solely to improvements provided by WAP funds.

Connecticut WAP will review and consult with DOE regarding any eligible rental structure brought under consideration for weatherization and all rental properties will be serviced in accordance with the policies and processes outlined in WPN 22-13.

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

Weatherization Agreement

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

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

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

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

CT WAP will work with our Subgrantees to ramp up small multifamily (2-4 unit) building service

in Program Year 2025. CT WAP will determine a reasonable ramp up rate through conversations with the Subgrantees. In PY24, CT WAP has a goal of serving at least 22 small multifamily buildings. PY24 formula funds will not be used to weatherize buildings larger than 4 units.

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

Describe the deferral Process

There are circumstances under which weatherization for an individual unit may have to be deferred, such as when the performance of allowable weatherization services may present a health and safety issue to the occupants or workers. Subgrantees are to have a deferral process in place that informs the owner and applicant as to the status of the application whenever it changes. The Subgrantee shall adhere to its internal process, approved by DEEP, in all cases of deferrals and referrals.

If weatherization services are to be deferred, the Subgrantee must send the applicant, either by electronic or regular mail, the Notice of Postponement of Services. The Subgrantee will send the Notice to the owner of the property, who is responsible for alleviating the issues, with a copy to the occupants of the unit.

The Notice of Postponement of Services must:

- Identify the specific reason(s) for deferral; and
- Include an adequate timeline for the owner to address the issues; and
- Be signed by the Owner Client and the Service Provider Auditor; or
- Be completed by the Subgrantee representative and sent via certified mail to the property owner.

Subgrantees should suggest solutions, including alternative resources that may be available to address each basis for deferral.

Deferrals may occur at any phase of the weatherization process. Subgrantee staff or weatherization contractors must recommend the deferral of work at any point when a health and safety risk to the occupants or workers is identified.

Deferrals are to be reviewed and approved by the Subgrantee management and fully documented in the client file.

Reasons For Deferral

Some circumstances under which a unit is to be deferred include, but are not limited to:

- Any existing condition that could endanger the health and/or safety of the work crew and/or contractor and cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding;
- Problems with building structure or the condition of its mechanical systems, including electrical, plumbing systems, and HVAC systems, that are in such a state of disrepair that failure is imminent, and they cannot safely be remediated within the budget or scope of Weatherization, Health, and Safety and/or Weatherization Readiness Funding;
- Extent and condition of lead-based paint or Asbestos in the house that house that would potentially create health and safety issues for the occupants or workers and cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding;
- Existing Moisture or Mold conditions with resulting problems that cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding;
- Sewage or sanitary problems that endanger the occupants or weatherization workers that cannot safely be remediated within the budget or scope of Weatherization, Health and Safety, and/or Weatherization Readiness Funding;
- A contagious or otherwise dangerous health condition of an occupant; that cannot safely be remediated within a reasonable time;
- An occupant who is uncooperative, abusive, or threatening to weatherization workers who must work on or visit the property;
- Evident illegal or dangerous activities that may be taking place in or about the property.

Resources for Referral

Where appropriate, referrals may be made to alternative resources where effective lines of

communication must be made between the Subgrantee staff and the referral agency staff. Several example programs include:

- U.S. Department of Housing and Urban Development (HUD) - HOME Program
- HUD - Community Development Block Grant
- U.S. Department of Health and Human Services - Community Services Block Grant
- U.S. Department of Agriculture - Rural Economic Community Development
- State-funded housing and rehabilitation programs
- Low-income program funds provided by local utilities
- City-funded housing and rehabilitation programs
- Donations or financial participation from landlords
- Donations from local churches or community groups
- Local Department of Health or Social Services Department

Deferral Resolution

If the issues specified on the Notice of Postponement of Services are not addressed by the property owner within the allowed timeframe, Subgrantees may deny further weatherization services. In this instance, a written denial notice must be issued to the applicant by certified mail. Time extensions may be granted, if in the judgment of the Subgrantee's weatherization program management, the owner is making progress on the underlying issues and may be expected to resolve the problem within a reasonably extended time period. Because such extensions tie up Subgrantee resources and prevent the use of funds on other eligible units, it is recommended that no more than two (2) extensions be granted. Once the specified deferral issues are adequately addressed, the process may continue as authorized by the Subgrantee.

Denials

The Subgrantee shall adhere to its internal process, approved by DEEP, in all cases of service denials. At any point after an applicant has been selected to receive weatherization services and is subsequently denied services, Subgrantees are to provide the applicant with a written denial notice. This denial notice must clearly state:

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

- The procedure for sending the appeal to the Subgrantee.

Subgrantee Appeal Process

Subgrantees are to return any appeal received after the fifteen (15) business day appeal period with a notice stating that the appeal cannot be considered as it was submitted beyond the deadline.

Subgrantees may use their own official procedure for hearing and appeal decisions after the procedure has been approved by DEEP. Appealed decisions are to be decided by a Subgrantee staff person who is at least one level higher than the person who made the decision on the case eligibility

An appeal must be considered and decided, and the decision must be communicated to the appellant in writing no later than ten (10) business days following receipt of the appeal. If the Subgrantee fails to meet this deadline, the appeal must be automatically forwarded by the Subgrantee to DEEP for action. The appeal decision notice must clearly state the acceptance or denial of the appeal. If accepted, the Weatherization process continues. If the appeal is denied, the notice must state:

- That the appeal has been reviewed and denied; and
- That the appellant has a right to final appeal to DEEP; and
- That the appellant has an additional ten (10) business days from the date of the second letter to appeal to DEEP; and
- The procedure required to be used to appeal to DEEP.

Denied Case Files

The Subgrantee must retain and maintain closed files in which weatherization work has not been provided, and those files are to be kept separate from eligible client files. The closed case file will include all of the following that are applicable (i.e. appeal documents):

- The completed application for Weatherization;
- Notice of Denial;
- All correspondence related to the case;
- Documentation of reason(s) used to determine ineligibility;
- Written case notes as applicable;
- Documentation related to a denied applicant's appeal;

- Notice to the appellant regarding all appeal decisions;
- Copy of further appeal to DEEP; and
- Copy of DEEP’s decision on the appeal

CT WAP uses the Connecticut Weatherization Assistance Program Notice of Postponement. If a deferral is resolved, the project is returned to the queue in the order in which it was initially received and is subject to verification of current eligibility requirements.

Weatherization Readiness Funds

Weatherization Readiness Funds (WRF) are designated for use by Grantees to address necessary repairs (health and safety, structural issues, etc.) that may be barriers to Weatherization Activities being funded by the US Department of Energy Weatherization Assistance Program (WAP). This funding is intended to overcome barriers to weatherization. The following is the plan utilized in the state of Connecticut to expend the Weatherization Readiness Funding. Use of WRF shall align with WPN 24-9.

Distribution of Weatherization Readiness Funds:

The State of Connecticut has been allocated \$383,625 for PY 25 and will allocate the funding in the following manner. WRF will only be used in jobs funded by WAP formula funds:

CT WAP Weatherization Readiness Funding	
Connecticut Weatherization Assistance Program (CT WAP) Subgrantees	Amount of Funding
Community Renewal Team (CRT)	\$191,812
Center for EcoTechnology, Inc (CET)	\$191,813
Total	\$383,625

WRF Maximum Per Unit:

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

Prioritization of Dwellings:

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

Reporting/Tracking:

All households deferred from receiving weatherization services due to a weatherization barrier being present are tracked according to the process outlined in WPN 24-9. CT DEEP will utilize the DOE recommended deferral tracker to track all jobs deferred from receiving weatherization services, including jobs that are remediated using WRF funding and jobs that are referred to CT's Residential Energy Preparation Services (REPS) program (CT's 1–4-unit weatherization barrier remediation program) to have the weatherization barrier addressed with other non-WAP and non-WRF funds.

Reporting Categories:

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

1. Count and descriptions of households assisted, including:
 - b. referral source;
 - c. summary of each completed job;
 - d. categorized expenses that include health and safety measure(s) completed by barrier type(s) and funding source;
 - e. type of households assisted (i.e. single family or 2-4 unit buildings); and
 - f. location of the home;
2. Expenditure allocation of all program funds, including WRF, in the aggregate; and
3. Status of each project (in pipeline, in-progress, or complete).

Subgrantees are required to use the DOE Deferral Tracker spreadsheet to document use of WRF funds to DEEP on a monthly basis.

Eligible Measures:

WPN 24-9 dictates which measures are allowable utilizing the WRF funding. Connecticut will use WRF funds for measures included in WPN 22-7, as well as roof repairs and replacements. The measure list below is not exhaustive and Connecticut may approve additional repairs

outside of this list if the unit would otherwise be deferred from weatherization. All measures must be aligned with WPN 24-9.

- Roof repair/replacement
- Exterior wall repair
- Interior wall repair (floor, ceiling, wall, etc.)
- Foundation or subspace repair
- Exterior drainage repairs (e.g., landscaping or gutters)
- Plumbing repairs
- Electrical repair
- Clean-up or remediation beyond typical scope of WAP including:
 - Lead paint
 - Asbestos (confirmed or suspected, including vermiculite)
 - Mold and/or moisture

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

Process:

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

Braiding Funds:

The only funding available for Subgrantees to address barriers beyond the standard health and safety allocation is Weatherization Readiness Funds. Currently, there are no other funding sources for DEEP to braid with the DOE funding. In the future, DEEP will continue to explore other sources of funding that can be used to address health and safety barriers to weatherization.

Monitoring:

The proper use of WRF funding is monitored in the following three ways:

- 1) First, an inspection of all work completed as part of a unit's remediation is conducted by the Energy Auditor who initially halted the energy assessment due to an identified barrier. Once that inspection is completed, the household is then served by CT WAP.
- 2) A final inspection will be completed by the service provider on 100% of units completed. 10% of those units will receive a final QCI from the state's quality control inspector.
- 3) All Activities conducted utilizing WRF are reviewed as part of Grantee's annual monitoring of Subgrantee activities.

Funding Restrictions:

CT WAP does not propose putting any restrictions on the use of WRF funds outside of the defined allowable scope described in WPN 24-9. Funds for remediation measures will be used exclusively to remediate barriers that prevent the installation of weatherization measures identified in the comprehensive Health & Safety audit.

V.1.3 Definition of Children

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

V.1.4 Approach to Tribal Organizations

In accordance with 10 C.F.R. § 440.16(f), low--income members of an Indian tribe who apply for the program will receive benefits equivalent to the assistance provided to other low- income persons within Connecticut. CT WAP has not made the recommendation provided in 10 CFR § 440.12(b)(5) that a tribal organization be treated as a local applicant eligible to apply pursuant to 10 CFR § 440.13(b). Connecticut law recognizes five Indian tribes: (1) Golden Hill Paugussett, (2) Mashantucket Pequot, (3) Mohegan, (4) Paucatuck Eastern Pequot and (5) Schaghticok. These tribes occupy six (6) reservations within the State.

V.2 Selection of Areas to Be Served

Connecticut uses one or more entities authorized by 10 C.F.R. § 440.14(c)(6)(ii) to deliver services

as Subgrantees (subcontractors or service providers). These entities have demonstrated experience and performance in weatherization or housing renovation activities, experience in helping low-income persons, and capacity to undertake a timely and effective weatherization program.

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

In Program Year 2025 (PY25), DEEP will work with those Subgrantee(s) which were competitively selected out of a Request for Proposals process that took place during PY23 to weatherize manufactured homes and single-family housing with requirements to achieve production goals identified by region in the Proposed State Plan to ensure statewide delivery of services. Subgrantees are under contract for three program years contingent upon performance. Specifically, to ensure equitable geographic distribution, Connecticut will include target unit production goals by region in Subgrantee contracts. The WAP service territories have been consolidated into two regions, with region 1 containing Middlesex, Tolland, Litchfield, Windham, New London, and Hartford counties and Region 2 containing Fairfield and New Haven counties. County population size and poverty level were determined using several data sources such as the 2019 Connecticut total population estimate and census data. This information was then used to split the counties so that each region would contain approximately an equal number of income-eligible households.

Subgrantees implemented a Request for Proposals (RFP) for vendors in PY23. Pricing will be updated annually through a competitive pricing scheme.

DEEP will seek the input of the Policy Advisory Council (PAC) which is the Connecticut Low -Income Energy Advisory Board (LIEAB) on PY25 program implementation strategies. LIEAB is an independent body whose membership includes stakeholders such as Community Action Agencies, State Agencies, Nonprofits, and Quasi Public Organizations. These key stakeholders assess how to improve the delivery of services statewide in PY25. Through ongoing monitoring as well as training and technical assistance, Connecticut works to ensure that all Subgrantees maintain administrative, programmatic, and technical staff or vendors capable of operating a successful program.

V. 3 Priorities

Weatherization Clients determined eligible for the program through LIHEAP or other means tested application processes are served on a first come first serve basis. If a waitlist develops, then an eligible client is added to a waitlist to receive weatherization services. Once on a waitlist, priority is given to the most vulnerable households, defined by DOE as being households with:

- High energy use (Defined in 10 CFR § 440.3)
- High energy burden (Defined in 10 CFR § 440.3)
- Elderly occupants (60 years of age or older)
- Disabled occupants
- Young children occupants (under age 6).

Once the most vulnerable clients have been served, priority is given to clients who have been on the waitlist the longest. All clients are required to reapply on an annual basis to ensure they are still eligible to receive services and no application on the wait list is older than one year. Subgrantees should keep a record of the first time the client applied for weatherization to ensure that a client does not lose their place on the waitlist when reapplying for weatherization services.

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

CT WAP will continue to refine the prioritization process to better facilitate cooperation with the utility partners and leverage non-DOE resources to best serve WAP households.

Definition of High Energy Burden Utilized in Connecticut

Consistent with Operation Fuel's definition of high energy burden in *Home Energy Affordability in Connecticut: The Affordability Gap*, CT WAP considers households spending 6% or more of their household income on energy costs as High Energy Burden sites. Service delivery priority will be provided to those sites. Households with a High Energy Burden are tracked in the monthly reporting template provided to CT WAP by each Subgrantee which is completed utilizing data from the Weatherization Assistant Web 10.x software. This data is then aggregated quarterly and entered in the PAGE QPR.

Definition of High Energy User Utilized in Connecticut

Connecticut will continue to work with our utility partners and the Connecticut Low-Income Energy Advisory Board (LIEAB) to research and develop a definition of High Energy user that meets the DOE requirements. Service delivery priority will be provided to those sites. Households that are High Energy Users will be tracked in the monthly reporting template provided to CT WAP by each Subgrantee which is completed utilizing data provided by the utility service providers. This will then be aggregated quarterly and entered in the PAGE QPR.

V.4 Climatic Conditions

Connecticut WAP has implemented the use of the Weatherization Assistant 10.06.002 audit tool. Climatic conditions from Weather Stations closest to the weatherized home site will be used for all site-specific WAP analyses.

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

The Weatherization Assistant 10.06.002 Audit tool utilizes Hartford, CT as the only weather file located within Connecticut. CT WAP recognizes Hartford, CT as the city which best represents the average climate conditions within Connecticut at 5,737 heating degree days. All site-specific audits conducted within Connecticut will utilize Hartford, CT as the selected weather file.

In accordance with WPN 22-7 Table of Issues, where heating system repair or replacement is required when there is a documentable threat to the occupants' health and safety, those costs are allowable as H&S expenses, unless the SIR is greater than or equal to one (1.0), then the measure shall be installed as an ECM.

Heating degree days were calculated with NOAA Climatic Data (<https://www.weather.gov/wrh/climate>) for a period of twenty-nine (29) calendar years from 1991 through 2024.

Based on this information:

- The central part of the State averaged 5,737 heating degree days.
- The southeastern part of the state averaged 5,528 heating degree days.
- The northeast part of the State averaged 6,317 heating degree days.
- The northwest part of the state averaged 6,970 heating degree days.

Connecticut's average of 5,975 heating degree days justifies heating system repairs or replacement as a H&S measure. Cooling Degree Days are not used in PY25 analyses, but CT WAP will work to develop a plan to address the replacement of cooling systems in collaboration with DOE starting

in August 2025. The goal will be to develop a clear process and plan for including cooling system replacements in the PY25 program.

All National Energy Audit Tool (NEAT) and Manufactured Home Energy Audit Tool (MHEA) site-specific audits will reference Hartford, CT weather files to complete audits.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

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

Note: *All work performed and reported as completed must follow DOE WPN 22-4 and the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide Standard Work Specifications (SWS) Aligned Edition Version, The CT WAP Operations Manual and the current Year State Plan/Master File.*

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

In accordance with WPN 22-4, CT WAP will provide Subgrantees and/or contractors with technical requirements for fieldwork including, but not limited to field guide(s), building diagnostic and combustion safety procedures, audit/testing policy and procedures; installation of energy conservation measures (ECM), H&S, incidental repair measures (IRM), and Final Inspections.

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

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

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

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

confirms Subgrantee and/or contractor's receipt, cognizance, and confirmation of communicated materials as referenced above. All work performed by CT WAP Subgrantees and/or contractors must be consistent with CT WAP SWS aligned Field standards and SWS aligned Field Guides.

Connecticut WAP has provided electronic links on the program webpage to the Connecticut WAP Quality Work Plan, Connecticut Weatherization Field Guide SWS Aligned Edition, the CT WAP Operations Manual Edition, and the Current year State Plan/Master File as part of the executed agreement between the Grantee and Subgrantee and the Subgrantee and direct hire contractors.

<https://portal.ct.gov/DEEP/Energy/Weatherization/Subgrantee-Documents-for-Connecticut-Weatherization-Assistance-Program>

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

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

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

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

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

Additional Program Information

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

- Up to \$10,000 on ECMs, including Ancillary and Incidental Repair Measures and Program Support Costs, or submit a request for prior Grantee Approval.
- Up to \$2,500 for H&S Measures or submit a request for prior Grantee approval.
- Up to \$2,500 for Incidental Repair Costs or submit a request for prior Grantee approval.

Definitions of allowable repairs are as follows:

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

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

Minor Repairs are defined as repairs that may be considered Incidental Repair measures, equal to or less than \$750. These may include cut and finish, access to attics and knee walls, siding repairs, and minor repairs associated with windows, doors, flashing, and masonry moisture infiltration points.

In all cases, the WAP client file must provide clear documentation of the need for the repairs and the relationship with the energy conservation measures that are enhanced or protected directly related to the repair. Documentation must include pictures and detailed descriptions of the repairs and invoiced costs presented by the contractor.

Note: See *WAP Operations Manual Section 311 and Section 702*.

Example contract language used in all Subgrantee contracts:

“All work performed must be in compliance with the DOE and CT WAP guidance, the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide SWS Aligned Edition, and the current CT WAP State Plan, available on DEEP’s webpage.”

Field guide approval dates

Single-family (includes 2-4 units multifamily structures) : 8/13/2021

Manufactured Housing: 8/13/2021

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-family

Audit Name: Other (specify)

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

Approval Date: 8/27/2020

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

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

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

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

Comments

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

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

Connecticut WAP is currently working with Hancock Software Inc. to implement a weatherization database management system.

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

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

Multifamily: For WAP Formula funds, multifamily refers to 2–4-unit structures. Any structures with 5 or more units will be weatherized using WAP IIJA, formerly known as WAP BIL, funds. CT WAP will work with our Subgrantees to ramp up small multifamily (2-4 unit) building service over multiple PYs. CT WAP will determine a reasonable ramp up rate through conversations with the Subgrantees. It is estimated that multi-family households will represent 20% or less of the eligible holds served by CT WAP in PY 2025. For 2–4-unit multifamily units, DEEP will utilize the NEAT software for energy audits.

V 5.3 Final Inspection

The CT WAP mechanism for adjusting Quality Control Inspector (QCI) Final Inspection and QCI In-Process Monitoring rates is based on results and information captured within the Connecticut WAP Quality Control Inspection Report (QCI, QWP23) and the Connecticut WAP Inspection Tracker PY24 Spreadsheets. Within those documents are activity rates stated as percentages, as well as action levels for increased QCI Final Inspection and QCI In--Process monitoring.

Connecticut WAP policy maintains that Subgrantee QCI final inspections will be conducted on 100%

of all completed units. Connecticut WAP policy maintains that Grantee QCI final inspections will be conducted on at least 10% of all completed units.

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

Note: *All Final QCIs conducted on work performed and reported as DOE completed CT WAP sites must be in compliance with 10 CFR§ 440.21, DOE WPN 22-4, DOE WPN 24-4 section 2, the Connecticut WAP Quality Work Plan requirements, Connecticut WAP Weatherization Field Guide SWS Aligned Edition, and the current program year’s State Plan/Master File.*

Subgrantees that fail to achieve certification beyond that point are required to make arrangements with their respective agencies regarding additional training and testing costs as soon as possible, contingent upon CT WAP approval. Failure of any person to achieve QCI Certification will result in a temporary suspension from additional “comprehensive” training opportunities.

Connecticut WAP has developed specific policies and tracking documents to address DOE prescribed QCI policy for administering quality control inspections. Please see attached Connecticut WAP Quality Control Inspection Report and 2025 Connecticut WAP Quality Work Plan.

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

An Auditor/ AQ CI is the Auditor who performs the initial audit and creates the work order. They may also perform the final QCI inspection, although it is preferred for these to be two separate individuals. The auditor cannot be involved in actual installation of measures at the site.

Note: *When subgrantees use the Auditor/QCI model, CT WAP will require quality assurance monitoring on a minimum of 10% of all completed units. In addition, Connecticut WAP will conduct ongoing quality assurance monitoring to ensure that the individual serving as both the Auditor and the Inspector is able to effectively and consistently perform both tasks on a regular basis.*

During PY25, CT WAP anticipates an increasing volume of unit completions throughout the PY. CT WAP will assess the need for additional auditors and/or QCIs to ensure complete program coverage.

For additional information see the response to V.8.4 Training and Technical Assistance Approach (PY 2025 Comprehensive Training and Technical Assistance Plan).

Connecticut WAP will provide specific tracking to evaluate the QCI Inspection process to document the range of controls outlined in WPN 22-4. Each CT WAP QCI Inspection Certificate identifies relationships of Auditor, Auditor/QCI, and/or Independent QCI. Projected monitoring and Final QCI Inspection goals have been created and funds allocated to respond to increased needs as determined necessary.

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

- Level 1: Subgrantee and or Subcontractor has routinely responded to corrective actions 100% effectively. No action necessary.
- Level 2: Subgrantee or Subcontractor has had marginal or insufficient results responding to corrective actions on initial responses. Subgrantee or Subcontractor ultimately addresses all concerns and demonstrates improvement/ The Subgrantee or Subcontractor may be subject to increased monitoring and/ or inspections.
- Level 3: Subgrantee or Subcontractor has failed to address corrective actions and or deficiencies repeatedly. This can result in temporary suspension and disallowed costs.
- Level 4: Indefinite suspension, defunding of Subgrantee, and Subcontracted resources.

V.6 Weatherization Analysis of Effectiveness

All Connecticut analyses of effectiveness will be conducted in compliance with 10 CFR § 440.14(c)(6)(i), DOE WPN 22-4 and the CT WAP Quality Work Plan (2025) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition, and the current year State Plan/Master File. There is an ongoing evaluation process used to determine the overall effectiveness of each subgrantee. This is done through the annual monitoring processes that are outlined in DOE WPN 24-4 and through an ongoing review process including a mid-year assessment of program implementation, as well as:

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

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

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

The Grantee also reviews Subgrantee procurement practices of both materials and subcontracting to assure costs are fair and relatively consistent across the state at the time of procurement as part of continuous monitoring.

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

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

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

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

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

The State is continuously improving its management of WAP by attending NASCSP conferences and orientations, participating in Regional NASCSP conference calls, learning best practices from other states, and leveraging the help and knowledge of the DOE WAP program managers.

Connecticut WAP is continually working with in-state utility partners to evaluate installed

measures costs and to utilize a streamlined approach to deliver effective and quality weatherization and energy efficiency services to the Connecticut low-income community. The utility administered Home Energy Solutions – Income Eligible (HES-IE) program serves approximately 7,800 income eligible homes per year. CT DEEP and the utilities are continuously working to standardize requirements between the service delivery models. Additionally, CT WAP is working on coordinating with our utility partners to analyze the realized energy savings of the installed weatherization measures more comprehensively.

A continuous improvement approach is used to monitor the Subgrantee(s). DEEP is committed to monitoring the effectiveness of the Subgrantee(s) to improve service delivery.

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

DOE adheres to the transparency requirements placed in these and other government financial assistance programs instituted by the administration. DOE will work diligently with any state WAP or local service provider to gather the required information and provide it to the requester. In compliance with 2 CFR § 200.338 retention requirements for records: “No federal awarding agency may place restrictions on a non-federal entity that limit public personally identifiable information (PII) or when the federal awarding agency can demonstrate that such records will be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 USC 552) or controlled unclassified information pursuant to Executive Order 13556 if the records had belonged to the federal awarding agency. The Freedom of Information Act 95 USC 552 (FOIA) does not apply to those records that remain under a non-federal entity's control except as required under 2 CFR § 200.315. If the records had belonged to DOE. DOE would be legally required pursuant to 5 USC 552(b)(6), of the Freedom of Information Act, to keep confidential any specifically identifying information related to an individual's eligibility application for WAP, or the individual's participation in WAP, such as name, address, or income information.” Thus, CT DEEP and the local weatherization service providers will extend that same protection to their client records for WAP. States may release information about recipients in the aggregate which does not identify specific individuals such as the number of recipients in a county, city, or a zip code that does not compromise the privacy of recipients.

V.7 Health and Safety

Connecticut WAP has implemented policies and procedures to address health and safety considerations that are in compliance with 10 CFR § 440.16, 10 CFR § 440.18, 10 CFR § 440.21, WPN 22-7 and WPN 19-5. These are included in the 2025 Connecticut WAP Health and Safety Plan, CT WAP Operations Manual: Sec. 400 Health and Safety, and QWP 2025 as attachments to this application. CT WAP tracks and budgets Health & Safety funds separate from Program Operations.

Please see the attached PY 2024 Grantee Health & Safety Plan found in the Section V.10 - Miscellaneous of this application for a comprehensive overview of Health and Safety as well as the Operations Manual, CT WAP Forms, Hazard Identification forms and Operations manual found at the following link: [Subgrantee Documents for Connecticut Weatherization Assistance Program](#)

V.8 Program Management

V.8.1 Overview and Organization

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

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

DEEP also has oversight of the ratepayer-funded utility program Home Energy Solutions – Income Eligible (HES-IE). This energy program serves the same low-income population as WAP in Connecticut and currently cost shares many measures reported on DOE WAP units. The program administrators of WAP and HES-IE are collaborating to align these two programs to more effectively serve the low-income population of Connecticut. The goal of aligning these two programs is to offer low-income residents a more comprehensive list of both health and safety and energy saving measures.

DEEP does not administer the Connecticut Energy Assistance Program (CEAP). CT's Department of Social Services (DSS) is responsible for administering CEAP. DEEP works closely with DSS due to the simultaneous intake of clients into both programs and is developing the integration of some services with LIHEAP services.

BETP administers the State Energy Program (SEP) grant. Housing and Urban Development (HUD) and other housing programs are administered through the Connecticut Department of Housing.

V.8.2 Administrative Expenditure Limits

Not more than 15 percent of any grant made to a State may be used by the Grantee and Subgrantees for administrative purposes in carrying out duties. Not more than 7.5 percent may be used by the State for such purposes and not less than 7.5 percent must be made available to Subgrantees by States. In its annual plan, a State may provide up to an additional 5 percent for administrative costs to recipients of grants of less than \$350,000. To do so, the State must determine that such recipient requires additional funding to effectively implement the administrative requirements established by DOE pursuant to 10 C.F.R. § 440.18 (e) and 10 CFR § 440.18(d).

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

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

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

V.8.3 Monitoring Activities

Connecticut’s monitoring approach will include an administrative review of documents and reports related to the organization, operation, and performance of service delivery.

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

Note: *All Monitoring activities will be conducted in compliance with DOE Guidance WPN 22-4, WPN 24-4, the Connecticut Weatherization Assistance Program Quality Work Plan (2025) requirements, Connecticut Weatherization Assistance Program Weatherization Field Guide Standard Work Specifications Aligned Edition, and the current year State Plan/Master File. For further information refer to the CT WAP Operations Manual sections 300, 400, 500, 600, and 700.*

CTWAP recognizes DOE’s Guidance and references the following CTWAP documents regarding specific monitoring activities:

Programmatic and Management Monitoring:

- The CTWAP Operations Manual Sections 300, 400, 500, 600, and 800
- The CTWAP SWS-aligned Field Guide.
- WPN 22-4: Subgrantee Monitoring – Attachment 1 “Updated Checklists and Operations Manual”

Note: *During the current program year, CTWAP will continue to adjust monitoring activities commensurate with the quality of work and the progress demonstrated by the subgrantee. Subgrantee monitoring will accept WPNs 22-4, WPN 24-4, and all other applicable DOE Guidance. CTWAP will perform comprehensive monitoring of Subgrantees on an annual basis. Records reviews at the subgrantee's office may involve multiple visits and may be focused on regions of the state, resulting in separate annual monitoring events according to region.*

In alignment with WPN 24-4, more frequent monitoring of Subgrantees that have been identified as having significant deficiencies will be conducted. The individual monitoring activities are structured as follows:

- Annual Comprehensive Administrative/ Fiscal Monitoring based on the current program year’s allocation.
- Technical Site Visit Monitoring of at least 10% of all completed units,
- Desk Monitoring, which consists of a file review of at least 10% of all completed units.

Note: *While this exceeds DOE minimum standards, the recent audit tool implementation and QWP-25 standards compliance warrant additional activities to ensure the best outcomes. Actual program year totals may be adjusted to DOE minimum levels if mid-year assessments indicate consistent acceptable performance at any Subgrantee.*

CTWAP will utilize contracted Technical Advisory services via a T&TA Subgrantee to conduct quality control inspections of at least 10% of all completed units. As part of our contract(s) with the Subgrantee(s) and as a part of our annual monitoring visit(s), CTWAP can require the Subgrantee to submit their most recent 2 CFR 200 Financial Audit. These financial audits will be reviewed and approved by DEEP's Business Office. CTWAP will continue to contract technical monitoring services with T&TA funds to complete all state level QCIs, field monitoring, and desk monitoring services. The provider(s) of these services will continue to provide monitoring and support

services under the direction of WAP program administrators. CT WAP anticipates that Subgrantees will utilize components of the DOE prescribed standard options to conduct QCIs as defined in WPN 22-4.

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

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

Contracted resources:

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

Weatherization State Team Members and their responsibilities for monitoring:

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

Position	Research Analyst
Office	Office of Affordable Housing Energy

	Retrofits (AHER)
Responsibilities	Programmatic performance and compliance
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

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

Position	Grants and Contract Specialist
Office	Office of Affordable Housing Energy Retrofits (AHER)
Responsibilities	Fiscal monitoring and contracting
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

Position	Supervising Accountant
Office	Central Business Office/Federal Grants Division
Responsibilities	Fiscal monitoring and compliance
Compensation	State Funding
Travel/Training Funding	100% Federal funding

Annual Administrative/Fiscal Monitoring is performed via a team approach made up of Technical and Fiscal Monitoring personnel utilizing the DOE WAP Onsite Monitoring Field/Subgrantee Checklist as well as the following instruments prepared specifically for use in Connecticut:

- CT Subgrantee Programmatic Monitoring Tool
- CT Subgrantee Fiscal Monitoring Tool
- CT File Review Form and onsite Field Review CT WAP Field Visit Form

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

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

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

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

- Consistent production of substandard workmanship, with no measurable improvement.
- Inadequate fiscal and/or management policies, procedures, enforcement, or controls.
- Failure to improve current management systems within State mandated time frames and/or implementation of corrected policy, procedures, and practices.

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

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

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

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

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

CT WAP routinely and systematically reviews monthly reports and conducts desk reviews of Building Weatherization Reporting to identify any potential monitoring needs. The contracted Technical Monitoring Compliance Consultant(s) may also review these reports to aid CT WAP in identifying specific training and/or monitoring needs.

The contracted Technical Monitoring Compliance Consultant(s) select(s) projects in various stages of completion and for specific measures to further evaluate Subgrantee's effectiveness and training needs.

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

- CT WAP Audit Checklist
- CT WAP Installer Checklist
- CT WAP Client File Review Form
- CT Field Monitoring Tools (Final Field, In-Progress, and Desk Monitoring)
- DOE WPN 22-4

Note: *All Technical Compliance Monitoring will be conducted in compliance with DOE WPN 22-4 and the CT WAP Quality Work Plan (2025) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition, and the current year State Plan/Master File and US DOE WPN 22-7 Health and Safety Guidance.*

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

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

Written monitoring reports delivered to the Subgrantee(s) will contain specific details for corrective actions and response times not to exceed 30 days of receipt of notifications. Any response directed to the Subgrantee(s) fiscal management that fails to address corrective action requests within the given time limits will result in disallowed costs of any stated discrepancy. Any disallowed cost will be deducted from subsequent monthly invoices until resolved to the satisfaction of CT

WAP management. Furthermore, a Subgrantee's failure to respond to a corrective action plan for significant findings will result in an increased number of monitoring visits and an increased frequency of visits until the corrective action is resolved and the State is fully satisfied.

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

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

Significant findings such as waste, fraud, or abuse will be reported to DOE immediately.

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

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

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

V.8.4 Training and Technical Assistance Approach and Activities

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

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

Although many of the core competencies and job classifications identified are universal, not all the core competencies will be appropriate for the job classifications identified in every state. For

instance, testing, repairing, or replacing heating and cooling systems in Connecticut requires certification or licensing from the State. Therefore, the auditor or weatherization installer may not be able to conduct this work. In Connecticut, work on heating and cooling systems must be subcontracted to a licensed contractor outside of WAP. However, just because a heating, ventilation, and air conditioning (HVAC) contractor is licensed by the state does not mean they possess the competencies required. Additional training for these contractors may be required or someone at the local agency must be competent in specifying what work the contractor must complete and to verify that the completed work complies with WAP's technical standards.

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

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

Connecticut is committed to increasing the WAP network's expertise. Numerous program training opportunities and hands-on workshops have been conducted with the goal of maximizing energy savings, minimizing production costs, improving the quality of work, and fostering management expertise. In Connecticut, T&TA funds are primarily used to train state weatherization staff on program operations, management, and technical topics. Staff members receive training at national and regional conferences, regional and state training centers, state and Subgrantee provided workshops, and in the field. In PY23 and PY24, CT WAP received feedback from DOE through technical and programmatic monitoring and has incorporated recommended trainings and technical support within the PY25 proposed T&TA plan (see Attachment "Training & Reporting Template" of the T&TA Plan).

Quality Control Inspection personnel must complete DOE- approved Comprehensive Training and possess the knowledge, skills, and abilities listed in the National Renewable Energy Laboratories Job Task Analysis and become certified by the Building Performance Institute (BPI) as a Home Energy Professional Quality Control Inspector. Supervision must be provided to all personnel who do not possess the proper certifications by an individual who currently holds the necessary certifications.

CTWAP recognizes DOE WPN 22-4 and will implement enhanced training, planning, and tracking that defines training and certification intervals for new hires and the incumbent workforce that are aligned

with current NREL Home Energy Professional (HEP) certifications and the position for which the worker is employed.

All comprehensive training is to be provided through an IREC accredited service provider. DEEP currently holds an existing contract with Green Jobs Academy through which CT WAP will strive to ensure that each Subgrantee will have a minimum of two Energy Auditors and two Quality Control Inspectors to weatherize the expected number of units each program year.

V.9 Energy Crisis and Disaster Plan

Energy Crisis

For this plan, an energy crisis is defined as a significant disruption or shortage in the supply of energy resources, which might lead to widespread shortages and/or increased prices.

The primary energy crisis that low-income households face in CT is an inoperable heating system during the heating season defined as October 1 - April 30. WAP-eligible households with inoperable heating systems will receive priority service delivery. Service providers will conduct a site-specific health and safety audit, energy efficiency assessment, and heating system diagnostic test. If the home is eligible for a heating system repair or replacement, the Subgrantee will solicit proposals from contractors for the repair or replacement. CT WAP Subgrantees will ensure that appropriate actions are taken to address heating-related crises in a timely manner and deliver high-quality and comprehensive weatherization to all sites receiving emergency heating services. Any emergency replacements that cannot be addressed by WAP shall be referred to DSS's Connecticut Energy Assistance Program (CEAP).

Disaster Planning

Connecticut has developed a State Response Framework (SFR) that outlines the roles and interactions of the State government with Federal, Local, Tribal, Non-Governmental, and Private Entities as well as the media and public in implementing emergency response and recovery functions in times of crisis. The framework describes actions to be taken and general responses to disasters that require statewide action. The current framework does not identify WAP as a resource for disaster response.

For weatherization purposes, a disaster is determined by a Presidential or Gubernatorial order declaring a Federal or State Emergency. The disaster may be caused by natural or man-made hazards and generally involves at least three phases: the crisis itself, the clean-up, and the rebuilding of the affected area.

In the event of a Federal or State-declared disaster, Subgrantees may continue to use DOE WAP funds to support typical weatherization activities. The Subgrantee can prioritize households that are in the in the Federal or state-declared disaster area as long as they meet one of the previously established prioritization criteria (Section V.3) for the program and as long as the household is free and clear of any insurance claims or other forms of compensation resulting from the disaster.

Please note that the following programmatic requirements still apply:

- ACPU limit(s)
- Allowable uses for WRF, as outlined in the Grantee Plan
- Requirements around incidental repairs (See 10 CFR 440.14(c)(6)(viii) for more details)
- Use of agency weatherization vehicles and/or equipment.
- Priority assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16(b)).

Allowable measures are limited to those contained within:

- 10 CFR 440
- DOE WPN 22-7
- DOE WPN 25-1

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

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

V.10 Miscellaneous Section

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CT WAP's Public Advisory Committee (PAC) is the Low-Income Energy Water Advisory Board (LIEWAB). This board meets on the first Wednesday of alternating months.

The Notice of Public Hearing and Notice of Opportunity for Written Comments (Notice) for the CT WAP public hearings provides the public with detailed information including the date, time, and location of the hearings regarding the CT WAP State Plan. The Notice also makes clear that these hearings are an opportunity to provide verbal or written comments on the State Plan. Information regarding where to access and review the State Plan is also included in this Notice. The Notice itself is distributed to the public via multiple avenues. It is posted on the CT WAP webpage, the Secretary of State's public agency calendar, and on DEEP's Energy Filings website. In addition to this, the Notice was sent out via email to the LIEWAB distribution list. LIEWAB is CT WAP's designated PAC, so many key WAP stakeholders are members of this distribution list.

The State of Connecticut established the Low-Income Energy Water Advisory Board (LIEWAB), in accordance with Connecticut General Statutes Sec. 16a-41b. The purpose of LIEWAB is to assist the Office of Policy and Management (OPM) and the Department of Social Services (DSS) in the planning, development, implementation, and coordination of energy-assistance-related programs and policies such as the Low-Income Home Energy Assistance Program. The Board advises the Department of Energy and Environmental Protection (DEEP) regarding the impact of utility rates and policies and the Low-Income Weatherization Assistance Program.

In PY25, CT WAP will apply to DOE to perform fuel switching and to install alternative energy efficiency measures (such as LEDs, heat pump water heaters, etc.). Converting heating systems to all-electric heat pumps can improve the energy efficiency of a home's HVAC system. However, due to different prices for different energy sources a home's heating and/or cooling bills may or may not be reduced with a conversion to a heat pump. Therefore, DEEP commits to working with DOE and the WAP Subgrantees to determine WAP program rules that will ensure conversions to

heat pumps are only recommended when bill reductions are reasonably assured. CT WAP will follow the submittal requirements for fuel switching approval detailed in WPN 23-6 Attachment 5 and for alternative measure approval detailed in WPN 23-6 Attachment 6. To attain fuel switching approval, CT WAP will pursue the second option laid out in WPN 23-6 Attachment 5 as a policy administered by the Grantee. CT WAP will work with the selected subgrantees of the formula and IIJA, formerly known as BIL, allocations to determine how best to incorporate fuel switching into the programs and to submit the required submission documents to DOE. CT WAP will ensure that utility bill impacts are evaluated prior to recommending fuel switching to a program participant. In PY25 CT WAP will also work with the Subgrantees to explore incorporating solar PV, as allowed by WPN 23-6, into the formula program. CT WAP will use the information gathered during this exploration process to determine if applying for approval from DOE to incorporate solar into the program is appropriate in future program years.