

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007931		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF MONTANA 1400 CARTER DRIVE HELENA, MT 596202956		4. Program/Project Start Date 07/01/2019	5. Completion Date 06/30/2021

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Department of Energy-2019 & 2020 WAP Formula Funds	81.042	\$ 62,534.00		\$ 5,933,474.00		\$ 5,996,008.00
2.						
3.						
4.						
5. TOTAL		\$ 62,534.00	\$ 0.00	\$ 5,933,474.00	\$ 0.00	\$ 5,996,008.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRA TION	(2) SUBGRANTE E ADMINISTRA	(3) GRANTEE T&TA	(4) SUBGRANTE E T&TA	
a. Personnel	\$ 162,872.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 162,872.00
b. Fringe Benefits	\$ 48,600.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 48,600.00
c. Travel	\$ 0.00	\$ 0.00	\$ 51,264.00	\$ 0.00	\$ 51,264.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 0.00	\$ 551,922.00	\$ 480,534.00	\$ 514,000.00	\$ 5,648,072.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 14,400.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 14,400.00
i. Total Direct Charges	\$ 225,872.00	\$ 551,922.00	\$ 531,798.00	\$ 514,000.00	\$ 5,925,208.00
j. Indirect Costs	\$ 70,800.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 70,800.00
k. Totals	\$ 296,672.00	\$ 551,922.00	\$ 531,798.00	\$ 514,000.00	\$ 5,996,008.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 62,534.00	\$ 0.00	\$ 5,933,474.00	\$ 0.00	\$ 5,996,008.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 162,872.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 48,600.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 51,264.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 3,369,956.00	\$ 579,121.00	\$ 110,539.00	\$ 42,000.00	\$ 5,648,072.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 14,400.00
i. Total Direct Charges	\$ 3,369,956.00	\$ 579,121.00	\$ 110,539.00	\$ 42,000.00	\$ 5,925,208.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 70,800.00
k. Totals	\$ 3,369,956.00	\$ 579,121.00	\$ 110,539.00	\$ 42,000.00	\$ 5,996,008.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0007931, State: MT, Program Year: 2019)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Action for Eastern Montana (Glendive)	\$574,389.00 47
Confederated Salish and Kootenai Tribes (Pablo)	\$254,915.00 25
District IV HRDC (Havre)	\$423,907.00 36
District IX HRDC (Bozeman)	\$436,245.00 40
District VI HRDC (Lewistown)	\$172,926.00 14
District VII HRDC (Billings)	\$679,735.00 59
District XI HRC (Missoula)	\$678,501.00 55
District XII HRC (Butte)	\$401,328.00 33
Northwest Montana Resource Council (Kalispell)	\$537,170.00 47
Opportunities Incorporated (Great Falls)	\$699,561.00 60
Rocky Mountain Development Council (Helena)	\$308,861.00 24
Total:	\$5,167,538.00 440

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	440
Rewatherized Units	0

Note: Planned units by quarter or category are no longer required, no information required for persons.

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	440
C	Total Units Reweatherized	00
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	440
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	\$3,369,956.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	440
H	Average Program Operations Costs per Unit (F divided by G)	\$7,658.99
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$7,658.99

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IV.3 Energy Savings

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	440	29.3	12892
Prior Year Estimate	211	29.3	6182
Prior Year Actual	224	29.3	6563
Method used to calculate savings description: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>			

IV.4 DOE-Funded Leveraging Activities

The Grantee does not anticipate utilizing weatherization funds for leveraging.
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IV.5 Policy Advisory Council Members

☐ Check if an existing state council or commission serves in this category and add name below

Former Energy Programs Bureau Chief	Type of organization: Other Contact Name: Kane Quenemoen Phone: 4069335391 Email: Chokecherry@Q.com
Former HRDC XII Weatherization Program Director	Type of organization: Local agency Contact Name: Dan Wood Phone: 4065590512 Email: pintlaralpacas@gmail.com
NorthWestern Energy	Type of organization: Utility Contact Name: Pamela Hanson Phone: 4064973343 Email: pamela.hanson@northwestern.com
Opportunities Incorporated	Type of organization: Non-profit (not a financial institution) Contact Name: Karla Seaman Phone: 4067610310 Email: karlas@gfoppinc.org
Public Service Commission	Type of organization: Unit of State Government Contact Name: Tina Shorten Phone: 4064446190 Email: tshorten@mt.gov

IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

Date Held	Newspapers that publicized the hearings and the dates the notice ran
02/19/2020	A legal Public Comment advertisement ran from February 19, 2020 through February 28, 2020 in the Helena Independent Record, the Butte Standard, the Great Falls Tribune, the Billings Gazette, the Missoulian, the Bozeman Chronical, the Miles City Star, the Lewistown News Argus and the Kalispell Interlake.
03/26/2020	A legal Public Hearing advertisement ran from March 17, 2020 through March 26, 2020 in the Helena Independent Record, the Butte Standard, the Great Falls Tribune, the Billings Gazette, the Missoulian, the Bozeman Chronical, the Miles City Star, the Lewistown News Argus, and the Kalispell Interlake. On March 26, 2020 a public hearing was conducted, via a Webinar only, on the 2020 DOE State Plan Application. The Presiding Officer's report and official transcript are attached.

IV.7 Miscellaneous

Recipient Business Officer: Sara Loewen sloewen@mt.gov
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(Grant Number: EE0007931, State: MT, Program Year: 2019)

(406) 447-4265

Recipient Principal Investigator:

Marcia Lemon
mlemon@mt.gov
(406) 447-4276

II.8 Policy Advisory Members

Association Affiliation

Tina Shorten	Montana Public Service Commission Consumer Affairs Representative
Karla Seaman	Executive Director, Opportunities, Inc.
Pamela Hanson	Northwestern Energy
Kane Quenemoen	Former Energy Programs Bureau Chief
 Dan Wood	 Former HRDC XII Weatherization Program Director

All members represent elderly, native american and the handicapped as well as the low income population of Montana in their respective positions and daily duties. The PAC responds to Department requests concerning low income energy policy, the LIEAP, LIWAP, and Universal Systems Benefit (USB) programs as issues arise. The PAC committee members advocate for the low income, elderly, native americans and the handicapped as a daily course of business. Each of the members is busy with their respective duties and as such the PAC meets on an ad-hoc basis.

Montana's ACSI action plan is attached.

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

INCOME – Annualized gross income means net income from self-employment added to all non- excluded income before deductions, including but not limited to wages, salaries, commissions, tips, profits, interest or dividends, retirement pay, workers’ compensation, and unemployment compensation received by all members of the household in the six (6) months immediately preceding the month of application. The six-month figure will be annualized by multiplying that figure by two to arrive at the household’s annual income. Sale of a primary residence is excluded from income under capital gains. (See Income Section 3.14) W2’s may be used to calculate income on LIEAP applications received in the month of January.

Montana's Low Income Energy Assistance Program (LIEAP) guidelines are used to determine eligibility for Weatherization. Households whose incomes are at or below 200 percent of poverty or categorically eligible for assistance under the Low Income Home Energy Assistance Act of 1981 are automatically eligible for weatherization assistance. Household members applying for these programs must meet the following eligibility criteria:

1. income is at or below 200 percent of the poverty level;
2. all members of the household receive cash assistance payments under the Supplemental Nutritional Assistance Program (SNAP) or are eligible to received SNAP;
3. all members of the household receive Title IV of the Social Security Act (Temporary Assistance for Needy Families) or Title XVI of the Social Security Act (Supplemental Security Income) or;
4. in accordance with applicable state or local law during the determination of eligibility for weatherization/fuel assistance.

Weatherization applicants must re-certify every year.

In order to ensure that no dwelling unit is weatherized without documentation that the unit is an eligible dwelling unit all households must complete an annual application for services. The link to the Low Income Energy Assistance (LIEAP) Policy and Procedure manual is <http://dphhs.mt.gov/hcsd/energyassistance>.

Describe what household eligibility basis will be used in the Program

Applicants complete an application for Home energy assistance under the Low Income Energy Assistance Program (LIEAP). Eligibility for weatherization and fuel (energy) assistance is based on household income and resources. To be eligible for LIEAP, the household must make no more than 60 percent of estimated Montana state median income for 2020, if the household consists of eight or fewer members or 150 percent of the 2020 federal poverty level for households with more than eight members. If the household receives benefits from Supplemental Nutritional Assistance Program (SNAP), Supplemental Security Income (SSI), or the Temporary Assistance to Needy Families (TANF) program, the household may qualify automatically for weatherization and fuel assistance.

To be eligible for weatherization only assistance, the applicant must make no more than 200 percent of the 2020 federal poverty level. Both homeowners and renters may apply for these programs.

Resource limits also apply.

Applicants are required to recertify annually to have their weatherization eligibility documentation updated.

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

It is the responsibility of the applicant to provide Social Security Number, verification of citizenship, proof of lawful permanent residency (LPR), or qualified alien status. To verify Lawful Entry into the United States as a “Qualified Alien” the following documents are obtained:

Certificate of Naturalization (DHS Forms N550 or N570); Certification of U.S. Citizenship (DHS Forms N560 or N561); Certification of Birth Abroad of a U.S. Citizen (Form FS240 or FS545); U.S. Citizen Identification Card (Form I197); Alien Registration Receipt Card (Form I551); Arrival Departure Record (Form I94); Temporary Resident Card (Form I688); or other proof of Qualified Alien status as provided by the Department of Homeland Security. This verification must be requested and provided.

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The social security number of each household member is electronically submitted to the social security administration for verification.

Individuals of households who refuse to submit social security numbers, proof of citizenship, proof of lawful permanent residency (LPR), or qualified alien status will be deemed ineligible members of the household.

An ineligible household member of legal age may apply for benefits on behalf of eligible household members.

In households consisting of eligible and ineligible household members, the income of all household members (eligible and ineligible) will be counted when determining eligibility. Only the eligible household members will be counted toward the total "number in the household" when counting the number of household members for benefit calculation purposes. However, the total number of combined eligible and ineligible members will be considered for weatherization purposes. All members of the household are counted for weatherization due to the ASHRAE requirements.

Marriage to a U.S. citizen has no effect on an ineligible member's eligibility for weatherization. A person does not automatically become a lawful permanent resident or a U.S. citizen by marrying a U.S. citizen. The marriage has no effect on the person's weatherization eligibility.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Households must be Low Income Energy Assistance Program (LIEAP) eligible or "Weatherization Only" eligible to receive weatherization services. Dwellings must be on the priority list supplied by the Grantee, or the subgrantee must determine the weatherization priority.

Prioritization for weatherization services is based on energy burden (defined as energy cost/income) with special consideration for households comprised of elderly persons, or persons with disabilities, and families with children. Households with the same energy burden are prioritized by highest usage.

A household which is otherwise LIEAP eligible but does not meet the LIEAP income eligibility may be eligible for "Weatherization Only" services. To be eligible, an otherwise "LIEAP qualified" household whose income is no more than 200% of the Federal Poverty Level would be eligible for "Weatherization Only" services.

Tribal weatherization households must be determined eligible for the Tribal Low Income Home Energy Assistance Program (LIHEAP). Tribal Indian Households are defined in the Memorandum of Understanding (MOU) between the State of Montana and the Tribe as residing within the boundaries of the reservation. Indian households on the reservation may be eligible for weatherization through the Grantee.

Agencies that provide weatherization services for Tribal clients must use information provided by the Tribal Low Income Energy Assistance Program to determine the priority for weatherization services.

Weatherization client files must include a priority number or reason for deviating from the priority list. The priority number is proof that the household is eligible for weatherization services.

The subgrantee is required to notify every household of their rights to a Fair Hearing.

CIRCUMSTANCES UNDER WHICH FAIR HEARINGS ARE GRANTED – Any claimant who is aggrieved by any action of the Department is entitled to a Fair Hearing, including all rights to review and appeal provided by the Fair Hearing process.

Describe Reweatherization compliance

A home can be reweatherized if the home was previously weatherized on September 30, 1994 or earlier. Each reweatherized dwelling unit receives a new energy audit which takes into account any previous energy conservation improvements to the dwelling. The weatherization dates are tracked using Montana's Computerized Energy Audit (CEA).

To qualify a unit for reweatherization, the household must reapply and be determined eligible for assistance. A new energy audit must be completed to determine which measures and materials should be installed based on current standards.

Describe what structures are eligible for weatherization

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Agencies will perform weatherization services on single family, site built, manufactured, and four-unit dwellings where the occupants (owners or renters) have been determined eligible for the Low Income Energy Assistance Program (LIEAP) and/or weatherization program.

Agencies may weatherize four-unit buildings from the weatherization priority list if not less than 50% of the dwellings in the building are eligible dwelling units. Each dwelling unit must be entered as a separate audit in the Computerized Energy Audit (CEA).

Agencies must receive permission from the Department of Energy to weatherize buildings larger than four (4) units.

Agency Owned Dwellings: All agency owned dwelling units to be weatherized require department oversight and pre-approval in order to ensure that no conflict of interest is present. The Department will review eligibility and approve weatherization measures prior to work being done.

1. The Department will review the LIEAP application of tenants in agency owned dwellings to verify weatherization eligibility.
2. Once weatherization eligibility is confirmed, the department will review and approve the proposed weatherization measures. Documentation of approval will be provided via the pre-approval process already established in CDS Energy Audit. The pre-approval reason is "Agency Owned Dwelling".

Note: The tenants will not be subject to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed.

Agencies may weatherize shelters or group homes. The number of dwellings that exist in a shelter or group home is based upon either eight hundred (800) square feet of the shelter/group home as a dwelling unit or each floor of the shelter/group home.

When shelter or group home residents are residing in the shelter or group home for reasons associated with being low income and the mission or purpose of the shelter or group home is to serve low income people, there is no requirement for application for weatherization. As long as the subgrantee documents that the shelter or group home meets this criteria, the shelter or group home can be weatherized.

For shelters or group homes that do not meet the above criteria, agencies must determine eligibility for weatherizing the shelter or group home based upon the occupants at the time of application. Each occupant must complete an application for assistance, including the manager if the manager lives in the dwelling. Eligibility is based upon the application and verification provided by each occupant.

Weatherizing of shelters or group homes will be discussed with and approved by the DOE Project Officer prior to weatherization.

Ineligible Homes

The building structure is in such a state of failure or imminent failure and the conditions cannot be cost effectively resolved. Homes with building structure and roofing conditions that require more than an Incidental Repair Measure (IRM) or Health and Safety Minor Repair limit of \$500 are not allowable. Monitor approval to exceed the \$500 Minor Repair limit may be granted on a case by case basis. Building rehabilitation is beyond the scope of the Weatherization Assistance Program.

The weatherization of nonstationary RV campers and trailers are not eligible for weatherization with any DOE funding because of the mobility of the dwelling.

Properties greater than 50 years old are considered for Historic Preservation. Historic Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of a historic property. Prior to the expenditure of federal funds to alter any structure or site, the subgrantee is required to comply with Section 106 of the National Historic Preservation Act (NPA). Section 106 applies to historic properties or sites that are listed on or eligible for listing on the National Register of Historic Places.

In order to fulfill the requirements of Section 106, the subgrantee must contact the State Historic Preservation Officer (SHPO) to coordinate the Section 106 review as set forth in 36 C.F.R. Part 800.

The SHPO agreement between the U.S. Department of Energy, the Montana Department of Public Health and Human Services and the Montana State Historic Preservation Office regarding WAP undertakings was extended to December 31, 2020. SHPO agreement is attached to the plan.

Describe how Rental Units/Multifamily Buildings will be addressed

If at least 50 percent of the units in a duplex or a four-unit building are eligible for weatherization, and one of the units is prioritized high enough to be scheduled for service, all the units in the building, including units not eligible for weatherization, will be weatherized to avoid nonproductive costs.

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No weatherization work will begin on a dwelling until the occupant and/or owner of the rental unit completes the DPHHS-EAP-013: Montana Weatherization Assistance Program(s) Access Agreement". Copies of the signed DPHHS-EAP-013 must be provided to the occupant and/or owner of the dwelling and the original signed copy must be maintained in the subgrantee's weatherization file. The DPHHS-EAP-013 form is intended to:

1. Grant permission to enter the dwelling and install weatherization measures.
2. Assure the primary beneficiary of the weatherization shall be the low income tenant or any successor tenant.
3. Inform the landlord that the amount of rent shall not be raised within five (5) years of the weatherization work because of any increase in value due to weatherization assistance. The amount of rent charged the tenant may, however, be raised to reflect matters other than the weatherization work performed.
4. Assure the landlord will not evict, terminate, or institute any court action for possession against any covered tenancy following the completion of work except in accordance with Montana law.
5. Ensure that no undue or excessive enhancement shall occur to the value of the dwelling unit.

If the total material and labor costs to perform a weatherization measure brings the individual Savings-to-Investment Ratio (SIR) below 1.0, the landlord can "buydown" or cost share to bring the SIR up to a 1.0 or greater cost effectiveness.

A SINGLE DWELLING UNIT WITHIN A MULTIFAMILY BUILDING:

A single family unit within a multifamily building can only be weatherized in consultation with the Department of Energy's Project Officer in instances where the following conditions are met:

- The unit is self contained, without sharing an attic or basement with adjacent units, and has its own individual heating and cooling systems,
- The unit has been audited with a current, approved energy audit tool and protocol that is able to adequately address a single unit within a larger structure, and
- The scope of work is specific to allowable measures within the eligible unit(s).

MULTIFAMILY

BUILDINGS OF FIVE OR MORE UNITS:

In situations involving multifamily dwellings consisting of more than four units, Montana's Computerized Energy Audit and separate engineering analyses will be submitted to DOE on a case by case basis and utilized to acquire DOE permission prior to initiating DOE funded weatherization work.

Any single rental unit in a multifamily building occupied by an eligible tenant, who does not meet the above criteria, may be weatherized by a subgrantee but work on the building must be limited to the one unit.

When fewer than 100% of the units in a multifamily housing complex are to be weatherized, an individual audit (Montana's Computer Energy Audit) must be completed on each unit unless some units have similar construction and square footage, then one audit is acceptable for each type of similar construction. If all units in a multifamily housing complex are to be weatherized, a single audit (Montana's Computer Energy Audit) of the entire building is adequate if appropriate to the situation.

Rental units may not be weatherized without first obtaining the written permission of the owner or authorized agent. The Weatherization Assistance Program Landlord Agreement (available from the Grantee upon request), includes provisions that rents will not be raised because of the increased value of the unit due solely to weatherization assistance, that tenants will not be evicted for the purpose of collecting higher rents, and that the present tenant or any successor tenant is the intended beneficiary of the agreement and shall have a right of enforcement. No undue or excessive enhancement to the value of the unit shall result through this program.

HUD assisted dwellings are treated the same as other multi-family units. The subgrantees follow the Grantee supplied priority list.

Complaints and Administrative Relief: Eligibility notices contain instructions on how to apply for an administrative review or a fair hearing. Administrative Rules of Montana (ARM) at 37.71.106 allow any person aggrieved by an adverse department action to request a fair hearing. ARM 37.71.602 adopts and incorporates by reference 10 CFR 440, the department's Weatherization Assistance Program (WAP) Policy Manual and National Renewable Energy Laboratory (NREL) Standard Work Specifications effective July 1, 2019.

Describe the deferral Process

The weatherization of a dwelling can be deferred (postponed until a later date) by the Subgrantee if providing weatherization services would pose a threat to the

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health and safety of the occupants, Subgrantee staff or contractors. The weatherization will be postponed until the conditions that pose a threat to health and safety have been resolved.

Household eligibility must be verified and current prior to weatherization proceeding after deferral.

Health and safety circumstances that justify the deferral of weatherization services include, but are not limited to:

- The occupant has a known health condition that prohibits the installation of insulation or other weatherization materials.
- The building structure or the mechanical systems within the dwelling, including electrical and plumbing, are in such a state of failure or imminent failure and the conditions cannot be cost effectively resolved. (Building integrity creates an inability to practically or effectively weatherize.)
- The dwelling has sewage or other sanitary problems that would further endanger occupants, Subgrantee staff or contractors if weatherization work was performed.
- The dwelling has been condemned or electrical, plumbing or other equipment has been condemned ('red-tagged') by local or state building officials or utilities.
- There are moisture problems in the dwelling that are so severe they cannot be cost-effectively resolved under existing health and safety measures or minor energy-related repairs.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances within the dwelling which cannot be resolved under existing health and safety measures.
 - It is recommended that the Subgrantee address the high carbon monoxide levels or provide the client with information on how to address the issue.
 - If the Subgrantee identifies high carbon monoxide levels during the "end of the day CAZ depressurization and spillage test", the Subgrantee must address and resolve the high carbon monoxide issues.
- The occupant/owner is uncooperative, abusive or threatening to Subgrantee staff and/or contractors who must visit the dwelling to perform weatherization related measures or services.
- The extent and condition of lead-based paint, mold or asbestos located in the dwelling would potentially create further health and safety risks.
- In the judgment of the Grantee or weatherization Subgrantee, any condition exists which may endanger the health and or safety of the occupant, Subgrantee staff or contractor.
- Partial weatherization of a dwelling is not allowable. All measures identified in the audit as being cost effective must be able to be done. Client must agree to meeting ASHRAE 62.2 requirements.

The reasons for the deferral of a weatherization project must be documented in the weatherization case file. The Subgrantee must provide the occupant/owner with a copy of a completed DPHHS-EAP-020 Subgrantee Health and Safety Walk Away or Deferral Notice. This form lists the health and safety conditions that must be addressed by the occupant or owner prior to weatherization work beginning or continuing the dwelling. The form requests that the Subgrantee be notified when these conditions have been corrected. A copy of this completed form is given to the occupant, a copy to the owner and a copy is retained in the weatherization case file.

Any charges incurred on a deferred dwelling may be charged to the DOE grant, but the deferred dwelling will not be counted as a completion.

V.1.3 Definition of Children

Definition of children (below age): **18**

V.1.4 Approach to Tribal Organizations

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

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

There are seven Indian reservations in Montana. The Flathead Reservation will receive U.S. Department of Energy funds from the grantee. Weatherization services on the Fort Belknap, Northern Cheyenne, Fort Peck, Rocky Boy's, Blackfeet and Crow Reservations will be provided by Human Resource Development Councils. Low Income Native Americans, who are enrolled tribal members, residing on the reservations will receive weatherization benefits equivalent to the assistance provided to other low income persons within Montana.

V.2 Selection of Areas to Be Served

Funds for the operation of Weatherization Assistance Programs will be allocated to Human Resource Development Councils (HRDC's) in the Governor's

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twelve (12) Planning Districts and to one (1) Indian Reservation. The DOE funds are allocated to the subgrantees using multi-year demographics information from the American Community Survey.

Criteria for selection of subgrantees include:

- Experience and performance in weatherization.
- Experience in assisting low-income persons in the area to be served.
- Ability to provide timely and effective weatherization services.
- Preference may be given to HRDC's or other nonprofit or public entities which are currently administering an effective program under Title II of the Economic Opportunity Act of 1964.

All eleven (11) subgrantees selected currently manage effective Weatherization Programs. All subgrantees have received comprehensive program reviews, demonstrating ability to administer programs in compliance with State and Federal Rules and Regulations. The grantee has received no adverse comment at public hearings or request for consideration of new subgrantees.

The service areas of the eleven (11) subgrantees encompass the entire State of Montana. Each county within a subgrantee service area receives weatherization services proportional to the ratio of its low-income residents relative to the population of low-income residents in the service area.

V.3 Priorities

Households must be on the priority list supplied by the grantee, or the subgrantee must determine the weatherization priority. In determining which eligible households will receive weatherization services and in what order, households in each of the governor's substate planning districts will be ranked according to priority based on the following:

1. The highest priority is given to households with the highest energy burden.
 - a. When calculating the energy burden of households containing any of the following the energy usage shall be multiplied by 1.25:
 - i. an elderly household member (age 60 or older);
 - ii. a disabled household member; or
 - iii. a household with a member who is a child under age 18.
2. Households with the same energy burden are prioritized by highest usage.
3. If the household has a primary space heat or primary water heat emergency, they may be moved to the top of the current priority list. The emergency must be documented in the client file.

Note: The weighted average energy burden for the 2019-2020 program year was 8.14% this corresponds with the fiscal year 2019 LIHEAP Performance Data reflecting Annual Energy Burden of 8.8%.

Agencies that provide weatherization services for Tribal clients must use information provided by the Tribal Low Income Energy Assistance Program to determine the priority for weatherization services.

Households can apply for summer weatherization-only services during the non-LIEAP heating season (May 1 – September 30). These households will not be reflected on the grantee generated priority list but the sub-grantee can determine the weatherization priority using the factors described above.

Determine the household's energy usage priority by using the household's energy burden. If there is a household member who is age sixty (60) or older, disabled (determined under the federal Social Security Administration (SSA) Title II or Title XVI criteria) or a child under age eighteen (18), the energy usage is multiplied by 1.25. This gives a priority number preference to households that contain an elderly, a member with a disability or a child under age eighteen (18).

Example: A household with a member who has a disability has an annual energy consumption of \$2,500 with an annual income of \$12,000.

Annual Energy Consumption x 1.25 because of the household member with a disability= \$3,125

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$$\$2,500 \times 1.25 = \$3,125$$

$$\text{Annual Energy Consumption} \div \text{Annual Income} = \text{Energy Burden}$$

$$\$3,125 \div \$12,000 = .26$$

Twenty-six percent (26%) is the household's energy burden. The household would receive the priority number just after the household with a twenty-seven percent (27%) energy burden.

The subgrantee then must compare the calculated priority number to the grantee generated priority list to determine when the household will be weatherized.

A household on the priority list will remain eligible for weatherization services until the new priority list is generated by the grantee. The subgrantee priority list is generated for eligible LIEAP households' a couple times per program year. Households must be weatherized in order of priority. Subgrantees can move a household up on the priority list based upon an emergency, travel considerations (e.g., subgrantee's next weatherization project is out of town; another dwelling with a lower priority number in the same area would also be weatherized by the subgrantee during the program year; both dwellings can be weatherized by the subgrantee to save on travel costs).

Tribal subgrantees will prioritize households for weatherization services at the time of eligibility determination. Tribal subgrantees will prioritize eligible households based on energy burden (defined as energy cost/income) with special consideration for households comprised of elderly persons, or persons with disabilities, and families with children. Households with the same energy burden are prioritized by highest usage.

Montana does not give additional priority points for "high residential energy users" and "households with high energy burdens".

V.4 Climatic Conditions

Climatic conditions vary considerably from region to region in Montana. The western portion of the State is mountainous. The eastern half of Montana consists of vast area of prairie, farm, and ranch land. Most communities in the State are situated in valleys and along river bottoms where the climate is somewhat more moderate. Annual precipitation ranges from eleven (11) inches in portions of Eastern Montana, to twenty-five (25) inches in the west and northwest. The table that follows indicates heating degree days (HDDs) in select areas within each subgrantee service area.

An averaged HDD amount is available for each agency's service area based upon a 30 year average compiled by the National Oceanic and Atmospheric Administration (NOAA).

Heating Degree Day (HDD) information entered on each individual computerized energy audit is used in the cost effectiveness calculations for that dwelling. The weatherization case file must contain the documentation for the use of the HDD information.

Dist. I, II, and III Heating Degree Days

Glasgow 8,560

Glendive 8,029

Miles City 7,620

Average 8,237

Dist. IV

Harlem 8,505

Havre 8,250

Chinook 8,729

Chester 8,629

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Average	8,532
Dist. V	
Great Falls	7,828
Valier	7,891
Ft. Benton	7,143
Average	8,161
Dist. 6	
Lewistown	8,413
Roundup	7,044
Stanford	7,710
Average	8,032
Dist. VII	
Billings	7,006
Big Timber	7,503
Red Lodge	8,357
Crow Agency	7,774
Hardin	6,825
Average	7,554
Dist. VIII	
Helena	7,975
Townsend	7,446
Boulder	8,436
Average	8,167
Dist. IX	
Bozeman	7,929
W. Ystn	10,934
Livingston	7,979
Average	9,131
Dist. X	
Kalispell	8,193

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Libby	7,379
T. Falls	6,496
Average	7,890
Dist. XI	
Missoula	7,622
Hamilton	7,494
Superior	6,816
Average	7,795
Action, Inc.	
Butte	9,399
Philipsburg	8,734
Dillon	8,194
Average	8,701
Blackfeet Reservation	
Browning	9,137
Northern Cheyenne Reservation	
Colstrip	7,313
Lame Deer	7,763
Salish Kootenai Reservation	
St. Ignatius	7,064
Arlee	7,072
Polson	7,092
Average	7,279
Fort Peck Reservation	
Poplar	8,395
Wolf Point	8,361
Average	8,237
Fort Belknap Reservation	
Harlem	8,505

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Average 8,532

Rocky Boys' Reservation

Average 8,532

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

The Montana Weatherization Policy Manual serves as a guide for weatherization policy and procedural requirements and can be viewed at:
<http://dphhs.mt.gov/hcsd/energyassistance.aspx>.

Montana has adopted and incorporated the Standard Work Specifications (SWS) tool on the National Renewable Energy Laboratory (NREL) web site. The link to the NREL web site is: <https://sws.nrel.gov/>. Prior to adoption, the Montana Weatherization Technical Committee members comprised of representatives from the state weatherization monitoring staff, the Weatherization Training Center, subgrantee weatherization program managers, and weatherization workers undertook an extensive review of the SWS for Single Family Homes. The SWS review identified several specifications for which Montana's installation procedures vary. The variances are outlined in the attached 2019 Quality Work Plan.

The WAP subgrantee contracts (Attached) have been modified to require the subgrantee provide the assurances outlined in the Quality Work Plan (QWP). The assurances include the acknowledgement that all work funded by DOE will be accomplished as specified in the SWS; that all workers, including contractors have been advised of the requirements; and that any contract initiated for the completion of weatherization work will require the work comply with the SWS. The MT Weatherization Assistance Program subgrantee contract states all work is being performed in accordance to the DOE approved energy audit procedures and 10 CFR 440 Appendix A. The subgrantee acceptance and signature on the contract which provides the DOE funding to the subgrantee serves as proof of receipt of the SWS and the updated MT Weatherization Policy Manual. Excerpts from the subgrantee Department of Energy contract are:

Section 2 Purpose:

"The weatherization activities shall be done in accordance with the DOE approved energy audit procedures and 10 CFR, Part 440 Appendix A.

Section 5 Services to be provided:

"(C) The contractor shall: (5) ensure every home funded entirely or in part by the Department of Energy, will undergo a final inspection performed and signed off by a Building Performance Institute (BPI) certified Quality Control Inspector (QCI). Final Inspections will verify the weatherization job has been accomplished in a manner consistent with the SWS and the Montana Weatherization Policy and Procedures."

"(F) The contractor shall ensure that all persons and entities, including its employees and approved subcontractors that will provide services under this Task Order, have been advised of the SWS requirements; will complete weatherization work in accordance with the SWS; and have been appropriately trained, licensed, certified and credentialed as required by the Department of Energy and law. "

"(G) The contractor shall ensure any contract/agreement initiated by the subgrantee agency for the completion of weatherization work, must include the requirement that the worker(s) will complete weatherization installations in accordance with the SWS."

Signature Page:

Acceptance of and signature on the contract providing DOE PY2020 funding to the subgrantee agency, will serve as proof of receipt of the SWS and the updated Montana Weatherization Policy and Procedure guidance.

The Montana Weatherization Training Center has developed a user friendly Manufactured Homes field guide and a Single Family field guide. These field guides include the most common measures performed on manufactured housing and single family homes in the State of Montana as well as photographic guidance supporting those measures.

The Montana Field Guides (Single Family and Manufactured Home) have been approved by DOE along with several variance requests that have been incorporated into the Field Guides. The Manufactured Home Guide was distributed at the Weatherization Roundtable and a supply of the Single Family Guide was sent to each subgrantee in September of 2018. Both guides (Single Family and Manufactured Home) are available upon request from the Weatherization Training Center or the State of Montana.

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Montana isn't planning on developing a field guide for multifamily units with 5 units or more at this time. Historically, Montana has not weatherized multifamily units with 5 or more units. The subgrantees have been instructed to use the Standard Work Specification on the NREL site for multifamily units with 5 units or more as needed. DOE approval will be obtained before any multifamily units with 5 units or more are weatherized.

All Montana weatherization activities are categorically excluded from further National Environmental Policy Act (NEPA) review.

Field guide types approval dates

Single-Family: 8/16/2018
Manufactured Housing: 5/9/2018
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: CDS (Montana)
Approval Date: 3/23/2016

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
Montana Computerized Energy Audit was approved on March 23, 2016. In accordance with WPN 13-5 the Montana WAP submitted the request to DOE for reapproval of the Montana Computerized Energy Audit in February 2016.
Approval Date: 3/23/2016

Audit Procedure: Multi-Family
Audit Name: Other (specify)
Montana will obtain DOE approval for weatherization work on any multi-family project larger than four units. Montana does not have an approved audit for multi-family units over 4.
Approval Date:

Comments

The Montana Computerized Energy Audit was last approved by DOE on March 23, 2016. In accordance with WPN 13-5 the Montana WAP submitted the request to DOE for re-approval of the Montana Computerized Energy Audit. The request followed requirements outlined in WPN 13-5.

Montana's approved CDS Energy Audit tool is approved for single family units, which includes dwellings with 4-units. Montana doesn't weatherize multi-family dwellings over 4 units without DOE approval. An estimated 9% of the dwellings weatherized are multi-family units of 4 units or less.

V.5.3 Final Inspection

Every home reported to DOE as a "completed unit" will receive a final inspection performed by a BPI- certified Quality Control Inspector to ensure that all work meets the specifications outlined in the SWS.

The Quality Control Inspector will certify the unit has received a final inspection and that all work meets the SWS by signing the final inspection form. The final inspection form must be included in the client file.

The final inspection must include review and assessment of the original audit to confirm the measures performed were those appropriate for the home and were completed in accordance with the Montana Energy Audit protocols.

Montana subgrantees will utilize a combination of methods to ensure each completed unit funded by DOE receives a final inspection performed by an

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independent BPI certified QCI. The larger subgrantees across Montana have one or more individuals who have been certified by BPI as Quality Control Inspectors (QCI's).

For the smaller subgrantees whose weatherization program consists of one or two individuals the subgrantee may contract with another subgrantee or an independent quality control inspector for the performance of the final inspections. This will allow these subgrantees to ensure the final inspection has been performed by an independent QCI. Montana has two final inspection forms one for stick-built homes and one for manufactured homes, both the final inspection forms are an attachment to the plan.

Appendix A of the Quality Work Plan (QWP) contains the 'Quality Control Inspector Agency Planning Sheet' indicating the plan for each subgrantee with regard to the number of BPI-certified Quality Control Inspectors.

V.6 Weatherization Analysis of Effectiveness

Analysis of subgrantee weatherization productivity and effectiveness is conducted using a combination of the following methods:

- Annual program monitoring of all subgrantees.
 - Monitors for the state which possess BPI certification as quality control inspectors (QCI) perform inspection of up to 10% of DOE completions.
 - The monitoring process is designed to ensure production goals are effectively reached and training and technical assistance activities are appropriately designed and delivered.
 - The monitoring of the sub-grantees is the principal method by which areas of potential improvement are identified.
 - All required recommendations, findings, repeat findings, corrective actions, and serious deficiencies for improvement are discussed with the sub-grantee on site, during the exit interview with the subgrantee director and in writing as part of the monitoring report.
- Monthly desk reviews of subgrantee program status reports to ensure subgrantee production and expenditures are on schedule and within budget;
- Annual survey of subgrantees to assess training and technical assistance activities and ensure training and technical assistance needs are addressed; and
- Ongoing energy savings evaluations to assess the effectiveness of energy conservation measures, energy audit calculations and procedures, and training and technical assistance activities.
- The Grantee incorporates monitoring feedback during the periodic Weatherization Roundtable meetings and in the written subgrantee monitoring reports.

Montana has a Weatherization Desk Monitoring report that is used to compare energy savings, blower door CFM reductions, and weatherization measures Subgrantee to Subgrantee and Subgrantee to state wide data.

One management mechanism that is being implemented to affect improvement is to track weatherization expenditures and completions quarterly. Subgrantees will be required to spend 40% of the funds at 50% of the contract period and 70% of the funds at 75% of the contract period. Subgrantees who are not spending the funds and submitting completions timely may need to submit reasonable justification or the funds will be reallocated.

V.7 Health and Safety

The Weatherization Health and Safety Plan and Implementation Guidance documents are included as separate attachments to the SF-424 in PAGE.

V.8 Program Management

V.8.1 Overview and Organization

DOE's Weatherization Assistance Program for Montana is situated in the Energy and Community Assistance Section of the Intergovernmental Human Services Bureau (IHSB) which is part of the Human and Community Services Division (HCSD). (The HCSD IHSB Organizational Chart is attached.) The Human and Community Services Division is one of nine divisions within the Montana Department of Public Health and Human Services. Program activities within the Human and Community Services Division include public assistance, Medicaid eligibility, employment and training, Supplemental Nutritional Assistance Program (SNAP), emergency solutions, commodities distribution, energy assistance and weatherization assistance.

The Intergovernmental Human Services Bureau consists of the Food Distribution Section; the Energy and Community Assistance Section; and the AmeriCorps Volunteers In Service to America (VISTA). Food Distribution Section programs include Food Distribution on Indian Reservations, Nutrition for the Elderly,

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Emergency Food Assistance, and Charitable Institutions. In addition to the Weatherization Assistance Program the Energy and Community Assistance Section's responsibilities include the Community Services Block Grant Program, the Low Income Energy Assistance Program, Housing Opportunities for People With Aids (HOPWA), and Emergency Solutions Grants Program. Weatherization activities are provided in Montana's single congressional districts.

V.8.2 Administrative Expenditure Limits

The grantee shall use no more than five (5) percent of U.S. Department of Energy funds for administrative purposes. To effectively implement administrative requirements established by DOE, subgrantees receiving less than \$350,000 of DOE funds will be provided up to an additional five (5) percent of their sub-grants for grant administration.

V.8.3 Monitoring Activities

Two (2) Field Monitors are responsible for subgrantee compliance with U.S. Department of Energy and State of Montana rules and regulations. The Field Monitors are programmatic, administrative, financial and technical monitors. These staff members are paid out of the Grantee Training and Technical Assistance budget category.

Both of the Field Monitors are Certified Renovators and are certified BPI Quality Control Inspectors.

In addition, there are two (2) monitors who monitor the Montana Weatherization Training Center.

The intent of monitoring is to identify training and technical assistance needs; assure that measures contained in Montana's Computerized Energy Audit reflect the State's housing stock, and climate; and assure that programs are in full compliance with applicable rules. This in turn, contributes to the grantee and subgrantee's ability to provide effective and timely weatherization assistance to eligible households in Montana.

Monthly desk monitoring is an important component of quality control in Montana. Desk monitoring will include routine analysis of the computerized energy audits, energy audit summary reports and Quarterly Energy Conservation Programs Status Reports. Information contained in these reports will enable the grantee to ensure the statewide average cost per home does not exceed U.S. Department of Energy funding source limits.

A minimum of one (1) onsite review of each subgrantee is conducted during the program year (see the monitoring schedules contained at the bottom of this section). Additional field reviews may be conducted to address potential problems and ensure compliance with required corrective actions. Monitoring will also address subgrantee program administration and production. The review of program administration will cover financial management, personnel management, property management, inventory control, record keeping, client file documentation, labor and materials procurement, and reporting and compliance documentation.

At a minimum, the Field Monitor, Fiscal Officer, Program Manager, and Bureau Chief review the annual audits for the ten Human Resource Development Council's and one Tribe. Any audit recommendations, findings, repeat findings, corrective actions and/serious deficiencies are reviewed and discussed to determine the appropriate action (e.g. additional monitoring of specific areas, additional internal controls needed, etc.).

The review of program production will cover energy audit procedures, quality of workmanship and adherence to Standard Work Specifications (SWS), compliance with ASHRAE 62.2.2016, verification that final home inspection was conducted by a BPI-certified Quality Control Inspector (QCI), review of program support expenditures, production goals, compliance with State and Federal material standards, monitoring of prices paid for labor and materials by subgrantees, and monitoring of the accuracy of subgrantee pre- and post-work inspections.

The Montana Weatherization Monitoring tool (attached to the plan) will be used during the annual onsite reviews.

Each on-site monitoring review will consist of the following elements:

1. Telephone contact will be made with the subgrantee director or designee.
2. A letter of confirmation will be sent informing the subgrantee of arrival and departure times.
3. An entry conference will be held informing subgrantee staff of the scope of the review.
4. The Field Monitor will verify BPI Quality Control Inspector(s) credentials before or during the annual monitoring visit.

All BPI Quality Control Inspectors are entered into CDS Energy Audit along with the date the inspector's credentials expire. The QCI must sign off on any DOE funded completion. The Energy Audit system will not allow a QCI to sign off on a completion if the BPI QCI's credentials have expired. In addition, the

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BPI QCI's Credentials will be validated by:

1. Searching http://www.bpi.org/individual_locator.aspx for certified Home Energy Professionals by name or state.
2. Obtaining a copy of the BPI QCI certificates from the Weatherization Training Center or
3. Obtaining a copy of the BPI QCI certificates while onsite monitoring.
4. Referencing the Training Spreadsheet maintained by the Grantee.

The Grantee requires that all weatherization subgrantees have staff or contractors who are BPI QCI certified to perform all final DOE inspections.

5. The Field Monitor will verify Renovation, Repair and Painting certifications before or during the annual monitoring visit. The Training spreadsheet tracks the weatherization workers who need to recertify their Certified Renovator credentials.
6. The Field Monitor will verify OSHA 10 certifications before or during the annual monitoring visit. The Training spreadsheet tracks the weatherization workers who need OSHA 10 training.
7. The following will be reviewed during the onsite monitoring visit to ensure the subgrantee is performing quality control inspections in an impartial and complete manner during the annual monitoring visit. The Grantee requires that all weatherization subgrantees have staff or contractors who are BPI certified QCI to perform all final DOE inspections.
 - Describe the individuals performing the quality control inspections
 - If the individuals are independent QCI?
 - The QCI is an individual that is not involved in the prior work on the home either as the auditor as a member of the crew. The Grantee or an DOE approved representative (for example, a certified QCI employed by a third-party)
 - A Field Monitor who is a BPI certified QCI or BPI certified QCI employed by a third-party will review at least five percent (5%) of all completed Department of Energy (DOE) Units.
 - The QCI will be tracked on each audit via the CDS Energy Audit.
 - If the individual audits the home:
 - The auditor performs the audit, creates the work order, and performs the final quality control inspection. The auditor is not involved in any of the actual work on the home.
 - This model does not allow for an independent review of the audit on every home, a Field Monitor who is a BPI certified QCI or a BPI certified QCI employed by a third-party must inspect at least ten percent (10%) of all completed Department of Energy (DOE) Units.
 - The Field Monitor will ensure the individual who is functioning as both the auditor and the QCI is able to consistently perform both tasks.
 - The QCI will be tracked on each audit via the CDS Energy Audit.
 - If the individual worked on the crew:
 - The quality control inspection was not performed in an impartial and complete manner.
 - The Field Monitor will implement disciplinary action.
 - The QCI will be tracked on each audit via the CDS Energy Audit.
 - The Field Monitor or a BPI certified QCI employed by a third-party will perform the QCI inspections including diagnostic testing.
 - All dwellings monitored by the Grantee will have two quality control inspection forms in the client file one for each quality control inspection.
8. Determine if the subgrantee installed all weatherization measures using the approved Standards Work Specifications via a client file review, work order review and inspection of the dwelling.
9. Every DOE WAP client file has a final inspection (completed by a QCI) that certifies that the unit had a final inspection and that all work met the required standards.
10. All the weatherization measures, including Health and Safety, called for in the work order were appropriate and were in accordance with the CDS Energy Audit.
11. Monitors will periodically monitor in progress work to ensure safe work practices are being followed.
12. Subgrantee financial management, personnel management, inventory control, property management, procurement, and compliance documentation will be reviewed. This section of the monitoring includes a review of fiscal expenditures, items procured, travel claims and timesheets.
13. An exit interview will be held to inform subgrantee staff of recommendations, findings, repeat findings, corrective actions and serious deficiencies.
14. If any Health and Safety issues are found during the visit that places the occupants in danger, the subgrantee is directed to resolve the issue immediately.
15. A written monitoring report will be prepared outlining recommendations, findings, repeat findings, corrective actions and serious deficiencies.

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16. Copies of the monitoring report will be sent, within 30 days of the onsite visit, to the subgrantee and appropriate funding agencies.
17. All recommendations, findings, repeat findings and corrective actions are tracked by the Field Monitor until final resolution.
18. Recommendations, findings, repeat findings, corrective actions, and serious deficiencies are detailed on the Montana Weatherization Monitoring tool for cumulative and long-term analysis.

Corrective Actions for Failure to comply with Weatherization Program Requirements

Based on routine State monitoring, reviews, or investigations related to specific complaints or allegations, the Field Monitor may determine that an agency has failed to comply with the terms of an agreement or a State plan, or to meet a Weatherization Program requirement. The Field Monitor's determination may be based on the subgrantee's failure to provide services, or to meet appropriate standards, goals, and other requirements established by the State, including Quality Control Inspections. The Field Monitor will document the basis for such determination and the specific finding, repeat finding, corrective action, or deficiency that must be corrected.

Communication of Findings, Repeat Findings, Corrective Action Requirements and Deficiencies

When a Field Monitor has determined that an subgrantee has a specific finding, repeat finding, corrective action, or deficiency, the Field Monitor must communicate the finding, repeat finding, corrective action or deficiency to the subgrantee and require the subgrantee to correct. To establish compliance with the requirements of the Weatherization Program, records of correspondence or other communications related to a finding, repeat finding, corrective action or deficiency are maintained.

Corrective Action Plan

If the Field Monitor determines that a subgrantee needs to develop and implement a corrective action plan, the Field Monitor will allow the subgrantee to develop and implement their plan within 60 days after being informed of a repeat finding, or corrective action requirements. The corrective action plan should identify actions that will be taken to correct the repeat finding or corrective action requirements within a reasonable period as determined by the Field Monitor. The Field Monitor will review the corrective action plan and issue a decision on whether the plan is approved as quickly as possible. If the Field Monitor does not accept the plan, the Field Monitor must specify the reasons why the proposed plan cannot be approved. The Field Monitor may exercise discretion based on the specific circumstances. The Field Monitor will increase the frequency and depth of monitoring.

Serious Deficiency

The Field Monitor will consider the seriousness of the deficiency and the time reasonably required to correct the deficiency. Examples of Serious Deficiencies may include, but are not limited to the following:

- A deficiency for which a subgrantee has previously instituted a corrective action plan and has repeated findings;
- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing and therefore presents a risk requiring immediate action.

Training and Technical Assistance to Correct Deficiencies

The State of Montana will ensure that weatherization activities are performed by properly trained workers who have received comprehensive training that is aligned with DOE's Job Task Analysis (JTA's).

The Field Monitor will offer training and technical assistance, if appropriate, to help a subgrantee correct identified findings, repeat findings, corrective actions or deficiencies. Technical assistance may be offered concurrently with the notification of a finding, repeat finding, corrective action or deficiency and should focus on the specific issues of the subgrantee to the extent possible.

The Field Monitor may determine that training and technical assistance are not appropriate. The Field Monitor will document reasons that training and technical assistance are not appropriate. Some examples of situations in which a Field Monitor may determine that training and technical assistance are not appropriate may include, but are not limited, to the following:

1. A finding, repeat finding, corrective action or deficiency for which the subgrantee has the expertise and skills available within the organization to make correct without assistance;
2. A finding, repeat finding, corrective action or deficiency for which a Field Monitor has previously provided training and technical assistance;
3. Multiple, widespread, findings, repeat findings, corrective actions and/or serious deficiencies that cannot feasibly be addressed through training and technical assistance;
4. A finding, repeat finding, corrective action or deficiency that involves evidence of fraud, waste and abuse of funds, or other evidence of criminal

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wrongdoing.

5. Repeated failure of a Quality Control Inspector or adequately inspect weatherization jobs using the DOE approved field guide.

Quality Improvement Plan

The Field Monitor will consider the seriousness of the finding, repeat finding, corrective action or deficiency and the amount of time required to reasonably resolve.

Examples of instances in which a Field Monitor may exercise discretion on whether a corrective action plan is appropriate or necessary may include, but are not limited to the following:

- A finding, repeat finding, corrective action or deficiency that has not been resolved.
- Failure of a Quality Control Inspector to adequately inspect weatherization jobs using the DOE approved field guide.
- A finding, repeat finding, corrective action or deficiency that involves evidence of fraud waste and abuse of funds, or other evidence of criminal wrongdoing.

If the Field Monitor determines that an agency needs to develop and implement a corrective action plan, the Field Monitor will allow the subgrantee to develop and implement their plan within 60 days after being informed of a repeat finding, corrective action requirements or deficiency. The corrective action plan should identify actions that will be taken to correct the repeat finding, corrective action requirements or deficiency within a reasonable period of time as determined by the Field Monitor which may include:

Notification of increase in frequency and depth of monitoring.

- Final notice for demonstrating improvement and metrics defined with timeframe.
- De-certification from performing Final Inspections, Remedial training, written reprimand, and on the job training/oversite by a qualified QCI until such time as the disqualified QCI can demonstrate proficiency and be recertified (retake QCI Certification).
- Notification to BPI, employer and/or other impacted parties (Sub-grantee, State and/or Contractor) that despite remedial training efforts and repeated warnings, QCI has failed to perform with will be prohibited from performing any final inspections within the state's current Weatherization program for the remainder of the grant period or one (1) year, whichever is less; or permanently depending on the circumstances.

The Field Monitor will review the corrective action plan and issue a decision on whether the plan is approved as quickly as possible. If the Field Monitor does not accept the plan, the Field Monitor must specify the reasons why the proposed plan cannot be approved. The Field Monitor may exercise discretion based on the specific circumstances.

The status of a subgrantee can improve, or decline based on how the agency complies with repeat findings, deficiencies and corrective action plan requirements. Once repeat findings, deficiencies or a corrective action plan has been resolved the agency's status can be restored.

Quality Improvement Sequence:

1. Recommendation: Training and Technical Assistance; and Best Practices
2. Finding: Required Action; Training and Technical Assistance and Go-backs
3. Repeat Finding: Training and Technical Assistance; Required Action; Corrective Action Plan; and Increase in frequency and depth of monitoring
4. Corrective Action Plan: Training and Technical Assistance; Required Action; Corrective Action Plan; Increase in frequency and depth of monitoring; Metrics defined with timeframe; and Final notice for demonstrating improvement
5. Serious Deficiency: Funding Reduction; Contract Termination; and Notify Sub-Grantee of failure to perform

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Action for Eastern Montana – Glendive: During the 2019 program year the Subgrantee completed 14 DOE dwellings. The Subgrantee provided weatherization services to the Northern Cheyenne and Fort Peck Reservations. The Subgrantee achieved average annual energy savings of \$784 (70%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

District IV Human Resource Development Council – Havre: During the 2019 program year the Subgrantee completed 15 DOE dwellings. The Subgrantee provided weatherization services to the Rocky Boy's and Fort Belknap Reservations. The Subgrantee achieved average annual energy savings of \$411 (55%). The Subgrantee was monitored during the 2019 program year and all program deficiencies are being addressed.

Opportunities Incorporated - Great Falls: During the 2019 program year the Subgrantee completed 28 DOE dwellings. The Subgrantee provided weatherization services to the Blackfeet Reservation. The Subgrantee achieved average annual energy savings of \$449 (56%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

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District 6 Human Resource Development Council – Lewistown: During the 2019 program year the Subgrantee completed 6 DOE dwellings. The Subgrantee achieved average annual energy savings of \$480 (44%). The Subgrantee was monitored during the 2019 program year and all program deficiencies have been addressed.

District VII Human Resource Development Council – Billings: During the 2019 program year the Subgrantee completed 35 DOE dwellings. The Subgrantee provided weatherization services to the Crow Reservation. The Subgrantee achieved average annual energy savings of \$281 (24%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

Rocky Mountain Development Council – Helena: During the 2019 program year the Subgrantee completed 9 DOE dwellings. The Subgrantee achieved average annual energy savings of \$419 (47%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

District IX Human Resource Development Council – Bozeman: During the 2019 program year the Subgrantee completed 21 DOE dwellings. The Subgrantee achieved average annual energy savings of \$422 (40%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

Community Action Partnership of Northwest Montana – Kalispell: During the 2019 program year the Subgrantee completed 33 DOE dwellings. The Subgrantee achieved average annual energy savings of \$454 (26%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions are being addressed.

District XI Human Resource Council – Missoula: During the 2019 program year the Subgrantee completed 25 DOE dwellings. The Subgrantee achieved average annual energy savings of \$437 (23%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

Action, Inc. – Butte: During the 2019 program year the Subgrantee completed 14 dwellings. The Subgrantee achieved average annual energy savings of \$691 (65%). The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

Salish and Kootenai Tribe – Pablo: During the 2019 program year the Subgrantee completed 12 DOE dwellings. The Subgrantee achieved average annual energy savings of \$676. The Subgrantee was monitored during the 2019 program year and all program deficiencies and corrective actions have been addressed.

2020-2021 Technical and Administrative Monitoring Schedule:

July 2020 - Community Action Partnership Northwest Montana, Kalispell

August 2020 - Opportunities Inc. including Blackfeet Reservation, Great Falls

September 2020 - Salish Kootenai, Pablo and District IX HRDC, Bozeman

October 2020 District 6 HRDC, Lewistown; and District VII HRDC, including Crow Reservation, Billings

March 2021 District IV HRDC, including Ft. Belknap Reservation and Rocky Boy's Reservation, Havre

April 2021—Action Inc., Butte

May 2021— District XI HRC, Missoula; and Action for Eastern Montana, including Northern Cheyenne Reservation and Fort Peck Reservation, Glendive

June 2021 - Rocky Mountain Development Council Helena

V.8.4 Training and Technical Assistance Approach and Activities

Training and technical assistance funds will be used by the grantee and subgrantees to maintain and improve the overall efficiency, quality and effectiveness of the Weatherization Program at all levels. Activities are designed to increase energy savings, ensure the safety of clients and workers, minimize production costs, improve program management, improve crew/contractor quality of work, and reduce the potential for waste, fraud, abuse, and mismanagement. The training

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and technical assistance needs of subgrantees are assessed annually and during periodic weatherization round tables, onsite monitoring visits, and desk reviews of local programs.

QCI Certification:

Workforce credentials are tracked using the computerized energy audit and the Weatherization Training Center. All BPI Quality Control Inspectors are entered into CDS Energy Audit along with the date their credentials expire. The QCI must sign off on any DOE funded completion. The Energy Audit system will not allow a QCI to sign off on a completion if the BPI QCI credentials have expired. In addition, the BPI QCI Credentials will be validated by:

1. Searching http://www.bpi.org/individual_locator.aspx for certified Home Energy Professionals by name or state.
2. Obtaining a copy of the BPI QCI certificates from the Weatherization Training Center.
3. Obtaining a copy of the BPI QCI certificates while onsite monitoring.
4. Referencing the Training Spreadsheet maintained by the Grantee.

The Grantee requires that all weatherization subgrantees have staff or contractors who are BPI QCI certified to perform all final DOE inspections.

All training and technical assistance activities are evaluated by the grantee and trainees to assure that training and technical assistance funds are being expended efficiently and effectively. Training and technical assistance evaluations are maintained on file by the Weatherization Training Center and tracked by the Grantee.

The grantee delivers training and technical assistance activities through the framework of the continuing education/certification programs developed by the Montana State University Extension Service, Weatherization Training Center (WTC). The WTC is an IREC-accredited Weatherization Training Center. The WTC is a partner in the WAP initiative to standardize and teach home energy upgrade skills. Core courses taught at the WTC are based on the WAP standardized curricula and train students to the industry knowledge and procedures covered in the NREL developed Job Task Analyses.

Montana Weatherization Training Center provides training for all 4 NREL Job Task Analyses developed by DOE.

- Home Energy Professional – Crew Leader
- Home Energy Professional – Energy Auditor
- Home Energy Professional – Retrofit Installer Technician
- Home Energy Professional – Quality Control Inspector

To ensure that all employees in the WAP program have been trained to the Job Task Analysis (JTA) required for their job designation, Montana State University Weatherization Training Center (WTC) has been charged with the task of reviewing training records and evaluating students for performance. The Grantee tracks training received by each individual worker via the Training Spreadsheet. The sub-grantees are required to report trainings completed by each employee annually. Sufficient classes are offered to accommodate new employees throughout the year. Specific Training (previously called “Tier 2 training”) are also scheduled throughout the year. Additional Specific Training will be offered should continual monitoring of the program necessitate it or, should a Subgrantee specifically cite a valid need.

2020 Planned Training Activities:

All Comprehensive Training (previously called “Tier 1 Training”) and Specific Training (previously called “Tier 2 Training”) courses include discussion and/or demonstration of SWS appropriate to the topic(s) of the course. Classes specifically focused on review of the SWS are also being offered.

Comprehensive Training: Comprehensive, occupation-targeted training which follows a curriculum aligned with the JTA for that occupation. Comprehensive Training is administered by the Montana Weatherization Training Center.

Retrofit Installer Technician:

- Retrofit Installer: Building Shell
- Retrofit Installer: Mechanic Systems
- Mobile Home Weatherization
- Renovation, Repair and Painting
- OSHA 10

Crew Leader:

- Mobile Home Weatherization
- Retrofit Installer: Building Shell
- Retrofit Installer: Mechanic Systems

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- Renovation, Repair and Painting
- Basic Furnace and Heat Pumps
- OSHA 10
- Weatherization Crew Leader- Advanced Skills

Energy Auditor:

- Mobile Home Weatherization
- Retrofit Installer: Building Shell
- Retrofit Installer: Mechanic Systems
- Renovation, Repair and Painting
- Basic Furnace and Heat Pumps
- OSHA 10
- Intro to Energy Auditing
- Energy Auditor & Written Exam

Quality Control Inspector:

- Mobile Home Weatherization
- Retrofit Installer: Building Shell
- Retrofit Installer: Mechanic Systems
- Renovation, Repair and Painting
- Basic Furnace and Heat Pumps
- OSHA 10
- Weatherization Crew Leader
- Intro to Energy Auditing
- Energy Auditor and Written Exam
- Quality Control Inspector

Specific Training: Short-term training to address acute deficiencies in the field, single-issue, training, conferences, and program management or leadership training is considered Specific Training since they do not encompass an entire JTA.

- Lead Inspector/Risk Assessor – Initial
- Lead Risk Assessor - Refresher
- Respiratory Protection/Fit Testing
- Insulation Systems and Applications
- Montana Asbestos Inspector Certification
- Adult First Aid, CPR and AED
- ASHRAE 62.2 Residential Ventilation
- Infrared Thermography
- Advance Furnace – Electric
- Advance Furnace Low Pressure Boilers
- Occupational Electrical Safety
- Digital Multimeters in Practice
- Whole House Assessment for Weatherization Professionals
- Home Energy Professional Skillset Review
- Advanced Pressure Diagnostics
- Advanced Combustion Testing
- Outfit Your Van or Truck: A Hands-On Workshop

The link to the Weatherization Training Center calendar is: <http://www.weatherization.org/calendar.html>.

Subgrantee staff must complete comprehensive energy auditor training prior to conducting energy audits. Subgrantee staff must also complete furnace training prior to inspecting completed furnace work and prior to prescribing furnace improvement or replacement measures. Subgrantee staff is also required to attend CDS Energy Audit training prior to being allowed to access the automated energy audit system.

Subgrantee staff may at the discretion of the respective program manager, attend training sessions more than once. Attendance at other training and technical assistance activities will be left to the discretion of field monitors and program managers.

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Other training and technical assistance activities undertaken by the grantee will include publishing client education information and improving and maintaining the computer audit and reporting systems. The grantee has allocated Department of Energy training and technical assistance funds to subgrantees with the recommendation that funds be used to ensure that conservation measures are understood and protected. Subgrantee training and technical assistance plans are submitted to the grantee for approval prior to subgrantee expenditure of these funds. Examples of acceptable subgrantee training and technical assistance activities include:

- Attend State and/or national training workshop.
- Contract for local training.
- Provide educational materials to low income families.
- Demonstrate weatherization techniques to low-income families, organizations, etc.
- Purchase materials for educational purposes or to enhance the technical capabilities of the program.
- Pursue nonfederal weatherization funds.
- Review weatherization and program management techniques utilized by other subgrantees.

The Grantee compares the effectiveness of each of the subgrantee weatherization programs by review of the energy savings achieved as detail on a report generated by the Computerized Database System. The report allows the Grantee to compare the statewide average of weatherization measures and energy savings with each individual subgrantee. The findings are reviewed with the subgrantee during monitoring reviews and at the Roundtable meetings. These comparisons are used to identify training and technical assistance needs and priorities. Some training and technical assistance is provided during the monitoring visits and during the weatherization Roundtables.

Montana has provided Comprehensive Training to weatherization staff and contractors across eleven (11) weatherization subgrantees. Montana will continue to send staff to Comprehensive Trainings as needed. Montana is prioritizing Comprehensive Training within the Energy Auditor job function as defined by the NREL Job Task Analysis to provide certifications for any staff seeking Auditor certifications. Additional courses will be prioritized for the Crew Leader and Retrofit Installer Technician job functions as training requirements for Energy Auditor are met.

The training center provides Energy Auditor training, as defined by NREL Job Task Analysis, to certify those seeking QCI certification for the first time or when renewing their QCI certification. The Weatherization Training Center has an in-house proctor for field exams.

Subgrantee staff are required to complete a minimum of 120 hours of IREC accredited Comprehensive Training for their specific job function. New staff hired will begin Comprehensive Training within 90 days of achieving permanent full-time employee status. Staff may not function unsupervised until training and certification requirements are met.

Subgrantee weatherization staff may not function unsupervised until 120 hours of training and certification requirements are met for Energy Auditor and Quality Control Inspectors. Weatherization staff hired as material installers and crew leaders will receive training, including on the job training, on Montana's material installation requirements and techniques.

Lead Training Certification

Renovator, Repair and Painting (RRP) training is required of all new hires within ninety (90) days of permanent employee status. All subgrantees must have at least two (2) EPA Certified Lead Renovators on staff. All contractors providing services with DOE funds must have at least one (1) EPA Certified Lead Renovator on staff to ensure compliance with current DOE guidance. RRP certifications need to be recertified every five (5) years. The field monitor will verify RRP certifications before or during the annual monitoring visit.

There are currently twenty-two (22) QCI-certified Inspectors in Montana's Weatherization network of eleven (11) subgrantees, two (2) state monitors and two (2) individuals at the Weatherization Training Center. In addition, most subgrantees have more than one (1) Quality Control Inspector. Three (3) subgrantees use contractors to complete their QCI inspections.

OSHA 10 Requirement:

The Department requires the OSHA 10 class for all weatherization workers. The Field Monitor will verify OSHA 10 certifications before and during the annual monitoring visit.

Training Assessment

Montana Weatherization Training Center will produce and maintain permanent training records for all subgrantee staff that includes date of hire, course work, course date and training provider. Weatherization Training Center will provide an updated subgrantee training inventory worksheet to DPHHS and the subgrantee's Weatherization Directors on a quarterly basis.

The subgrantees are required to submit T&TA work plans and budgets annually before T&TA funds can be expended. Training needs are outlined by the

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subgrantees in the required T&TA work plans. Subgrantees ensure in their budgets and work plans that all weatherization workers receive regular Comprehensive Training every 5 years.

Additionally, Training and Technical Assistance needs are noted and discussed during annual subgrantee on-site monitoring visits, meetings/conferences and upon request from subgrantees. Field monitors also provide individualized training during on-site reviews. These trainings are determined based on the needs identified during the monitoring process and specific requests from the coordinators, auditors and crews.

Training Priority Development

The State of Montana assesses subgrantee productivity on a quarterly basis. Any anomalies noted in energy audits will allow for additional individualized training in both the energy audit tool and in providing weatherization services to weatherization recipients.

The current priorities for training are as follows:

1. Once per year quality assurance reviews of participant files;
2. Annual review of trends observed during annual onsite monitoring;
3. Discussion of trends with Weatherization Manager network to share best practices and ensure standards and program guidance are implemented consistently throughout Montana; and
4. The WTC will also coordinate training and technical assistance events on an individual subgrantee basis, as deemed necessary based on monitoring results and/or at the subgrantee's request.

Client education is covered by the subgrantees' auditor, crews and final inspector beginning at the audit and ending at the final inspection. Client education includes reviewing required documents, discussion of the work to be completed and maintenance after the job is completed.

Percent of overall trainings

Comprehensive Trainings:	89.0
Specific Trainings:	11.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	32.0
Percent of budget allocated to Crew/Installer trainings:	57.0
Percent of budget allocated to Management/Financial trainings:	10.0

V.9 Energy Crisis and Disaster Plan

The State of Montana shall address energy crises through the crisis component of its Low Income Energy Assistance Program which is described in 37.70 Administrative Rules of Montana.