

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

(Grant Number: EE0009892, State: CT, Program Year: 2022)

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Income means cash receipts earned and/or received by the applicant before taxes. Income does not include the exclusions identified in Department of Energy (DOE) Weatherization Assistance Program (WAP) guidance, WPN 22-3. Gross income should be used to determine eligibility, not net income. 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:

1. 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,
2. 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
3. Who is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200% percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

Consistent with 10 C.F.R. § 440.22(a), CT WAP considers a household eligible for WAP once they are determined eligible for assistance for the Low-Income Energy Assistance Program (LIHEAP) under the Low-Income Energy Assistance Act of 1981. Administered by DSS, LIHEAP limits program participation to households at or below 60% of state median income. Once a household has been deemed eligible for LIHEAP assistance through the Connecticut Energy Assistance Program (CEAP), the household is also considered automatically eligible for WAP, subject to confirmation of LIHEAP eligibility by DEEP.

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

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

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

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

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

Subgrantees are required to verify home ownership by contacting the local assessor's office for a copy of the deed. After review, if the client is not listed on the deed or if there are individuals on the deed who are not listed on the application materials, further review by the Subgrantee is required. This additional review may take the form of a client interview in conjunction with a request for back-up documentation verifying the information obtained in the interview. See § 203.6, Proof of Ownership, CT WAP Operations Manual. 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 through for CEAP eligibility must be verified by CT WAP staff to confirm eligibility. See §§ 201.3, 202, 202.2, CT WAP Operations Manual.

Describe Reweathering compliance

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

CT WAP maintains an electronic database of all homes that have been weatherized under DOE WAP, LIHEAP, HUD and USDA fifteen or more years ago. Subgrantees are provided controlled access to this information for lookback purposes. The Grantee limits and monitors the number of such dwellings that each Subgrantee may re-weatherize and authorizes re-weatherization on a case-by-case basis.

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

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

Describe how Rental Units/Multifamily Buildings will be addressed

Connecticut WAP, in accordance with 10 C.F.R. § 440.22(b)(3), has established procedures to ensure that benefits of weatherization assistance in rental units accrue primarily to the low-income tenants residing therein. Connecticut WAP will review and consult with DOE regarding any eligible structure brought under consideration for weatherization.

Connecticut WAP is currently conditionally approved by DOE to weatherize manufactured homes and single-family housing (8/27/2020) and will spend PY22 acquiring accreditations and specialized staff to deploy American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Level II audits in multi-family housing.

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Weatherization Agreement

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

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

Describe the deferral Process

When conditions warrant, it may be necessary to defer work in a dwelling, postponing until the problem(s) can be resolved.

All serious health and safety (H&S) problems encountered that will either prevent or delay weatherization service delivery is documented on the "Notice of Postponement of Services" form, along with possible solutions. The client is asked to sign this form, which is then signed and dated by a Community Action Agency (CAA) representative. If the client is a renter, a copy is also sent to the landlord. Clients remain eligible, without eligibility reverification, for weatherization services if all H&S concerns triggering deferral are addressed within sixty (60) days of receipt. Should remediation take longer than that, eligibility must be reverified in accordance with State and Federal policy. Work must be completed within 12 months of the original eligibility determination date of the client.

Connecticut WAP will implement the DOE Deferral Tracking Tool in PY22 to assist with deferral tracking. Deferral conditions may include any of the following situations:

- The client has known health conditions that would be impacted by the installation of insulation or other measures;
- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent, and the conditions cannot be resolved cost-effectively;
- The building has sewage/other sanitary problems that may endanger client/weatherization workers if weatherization work were performed;
- The building has been condemned or electrical, heating, plumbing or other equipment has been "red tagged" by local or State building officials or utilities;
- Moisture and drainage problems are so severe they cannot be resolved under existing guidelines;
- Dangerous conditions exist due to high carbon dioxide levels in combustion appliances, high levels of formaldehyde or other pollutants and volatile organic compounds (VOCs), and cannot be resolved under existing guidelines;
- The extent and condition of lead-based paint in the building would potentially create further H&S problems;
- The client is uncooperative, abusive or threatening to auditor/crew/subcontractors or others who must work in/visit dwelling;
- In the weatherization auditor's judgment, any condition exists which may endanger H&S of work crew or subcontractor (e.g., extremely unsanitary conditions) ;
- In the weatherization auditor's judgment, illegal activities are taking place on the property;
- Infestation of pests cannot be reasonably removed or creates H&S concern for weatherization workers;
- Client exhibits sign(s) of hoarding behavior that prevents the installation of weatherization measures necessary to improve the home's efficiency;
- Radon levels or the perception of radon-related conditions at the site prevent weatherization activities to be permitted by the client.

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Buildings deferred due to H&S reasons may be targeted for Weatherization Readiness Funds (WRF) or be routed to the Statewide Weatherization Barrier Remediation Program (WxBRP) before weatherization commences. In PY21, WxBRP was created by CT DEEP in conference with key stakeholders and members of EnergizeCT's Energy Efficiency Board (EEB) as a comprehensive strategy to remove H&S barriers such as, mold, lead and asbestos to ensure that direct benefits of energy efficiency improvements delivered by CT WAP are received by targeted beneficiaries.

If at any point after an applicant has been selected from the waiting list the case is denied, Subgrantees must provide a written denial notice to the applicant. The denial notice must clearly state:

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

Appeals received after the fifteen-day period should be returned with a notice stating that it will not be considered as it was submitted beyond the deadline.

Subgrantees may use their own official procedure for hearing and appeals decisions. Appealed decisions are to be decided by an Subgrantee staff person, at least one level higher than the person who made the decision on the case eligibility. That person's decision should be communicated to the appellant in writing, no later than ten (10) business days following the receipt of the appeal. If the Subgrantee fails to meet this deadline, the appeal must be automatically forwarded by the Subgrantee to DEEP for action. The appeal decision notice must clearly state the acceptance or denial of the appeal. If accepted, the weatherization process continues where it was left off.

If the appeal is denied, the notice must state:

- That the appeal has been reviewed and denied.
- That the appellant has a right to a final appeal to DEEP.
- That the appellant has an additional ten (10) business days from the date of the second letter to appeal to DEEP; and,
- The procedure for further appeal to DEEP. When the appeal is received at DEEP, DEEP will review the case. DEEP may request case file materials and speak personally to Subgrantee staff or the appellant. The appellant and Subgrantees will be notified of DEEP's decision within ten (10) business days of its receipt of the appeal. After DEEP decision is issued, no other administrative appeal steps will be available to the denied applicant. Nothing in this process is to be construed as limiting an applicant's right to seek additional legal and judicial remedy.

CT WAP uses form 14: Notice of Postponement, to comply by the above requirements.

If a deferral is resolved, the project is returned to the queue in the order in which it was initially received and is subject to verification of current income eligibility requirements.

Note: For further reference please see CT WAP Operations Manual 2022 Section(s) 204, 204.1, 204.2, 204.3, 424.1, 205, 205.1, 205.2, 205.3, 308.5, 312.4, 313.1, 400, 401, 406, 406.3, 407, 408.2, 408.3, 410.1, 411, 412, 414, 416, 417.1, 417.2, 417.3, 417.4, 417.6, 417.9, 418, 419, 420, 421, 424, 424.1, 425, CT WAP Guidance #3, CT WAP Form # 14, and CT WAP PY22 Health and Safety Template.

V.1.3 Definition of Children

Definition of children (below age): 6

V.1.4 Approach to Tribal Organizations

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

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

Tribal organizations shall not be treated as local applicants. Rather, in accordance with 10 C.F.R. § 440.11, low-income members of an Indian tribe will receive benefits equivalent to the assistance provided to other low-income persons within Connecticut. Connecticut law recognizes five Indian tribes: (1) Golden Hill 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. § 440.15 to deliver services as Subgrantees (subcontractors), which entities have demonstrated experience and performance in weatherization or housing renovation activities; experience in helping low-income persons in the area to be served; and capacity to undertake a timely and effective weatherization program.

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

In Program Year 2022 (PY22), DEEP will continue to work with Subgrantees, the Community Renewal Team (CRT) and New Opportunities, Inc. (NOI), 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. Specifically, to ensure equitable geographic distribution, Connecticut will include target unit production goals by region in Subgrantee contracts. Regional production goals and budgets are based upon a demographic formula used to deliver WAP services in previous years. Connecticut believes this approach is necessary to ensure the delivery of services to WAP clients statewide.

Economic shocks caused by COVID-19 have exponentially increased the cost of materials, time and labor in construction. Existing Subgrantees will be required to implement a Request for Proposals (RFP) for new vendors in PY22 in order to refresh unit cost pricing that was established three years ago.

In PY22, Connecticut WAP will implement an RFP to identify and select additional Subgrantees for PY23 participation to account for the increase in the scale of operations from servicing multi-family housing and from additional federal funding pursuant to the (Infrastructure Investment Jobs Act (IIJA). IIJA funds have been allocated to Connecticut WAP totaling \$46,215,781 and will be disbursed over the course of five years.

Connecticut DEEP will seek the input of the Policy Advisory Council (PAC) which is the Connecticut Low-Income Energy Advisory Board (LIEAB). LIEAB is an independent body who's membership includes stakeholders such as Community Action Agencies, State Agencies, Non-Profits, and Quasi-Public Organizations. These Key stakeholders assess how to improve the delivery of services statewide in PY22. Former Subgrantees and subcontractors are not precluded from seeking to provide services in PY22 if they can demonstrate the technical and programmatic capacity and financial stability needed to implement the program. Through ongoing monitoring as well as training and technical assistance, Connecticut works to ensure that all Subgrantees maintain administrative, programmatic, and technical staff or vendors capable of operating a successful program.

V.3 Priorities

Clients determined eligible through LIHEAP procedures receive, with their notice of eligibility, weatherization information which they complete and return if they are interested in receiving weatherization services. Priority is given to clients most vulnerable, including households with a member who is elderly (60 years and older), disabled, or younger than six (6). Priority consideration is also given to households with high energy use (annual heating costs exceeding \$2,500 or 6% of household income). DSS provides to DEEP, by region, the list of households eligible for LIHEAP.

High Energy Burden Priority

Consistent with Operation Fuel's definition of high energy burden in *Home Energy Affordability in Connecticut: The Affordability Gap*, CT WAP considers households spending 6% or more of their household income on energy costs as High Energy Burden sites. Service delivery priority will be provided to those sites. Households with High Energy Burden are tracked in the monthly reporting template provided

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to CT WAP by each Subgrantee which is completed utilizing data from the Weatherization Assistant 8.9.1 software. This data is then aggregated quarterly and entered in the PAGE QPR.

V.4 Climatic Conditions

Connecticut WAP has implemented the use of the Weatherization Assistant 8.9 audit tool. Climatic conditions from Weather Stations in closest proximity 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 8.9 Audit tool utilizes Hartford, CT as the only weather file located within Connecticut. Connecticut WAP recognizes Hartford, CT as the city which best represents the average climate conditions within Connecticut at 5,278 heating degree days. All site-specific audits conducted within Connecticut will utilize Hartford, CT as the selected weather file.

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.

Heating degree days were calculated through BizEE Degree Days software tool www.degreedays.net for a period of two (2) calendar years from 2020 through 2021.

Based on this information:

- The central part of the State (Hartford) averaged 5,513 heating degree days.
- The southeastern part of the state (Bridgeport) averaged 4,754 heating degree days.
- The northeast part of the State (Windham) averaged 5,686 heating degree days.
- The northwest part of the state (Waterbury) averaged 5,747 heating degree days.
- The southcentral part of the state (New Haven) averaged 4691 heating degree days.

Connecticut's average of 5,278 heating degree days justifies heating system repairs or replacement as a H&S measure. Cooling Degree Days are not used in PY22 analyses but will be considered in future program year analyses.

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 Connecticut WAP is performed in accordance with the DOE-approved, energy audit procedures and 10 C.F.R. § 440 (Appendix A).

Note: All work performed and reported as completed must be in compliance with DOE WPN 22-4 and the CT WAP Quality Work Plan requirements, CT WAP Weatherization Field Guide Standard Work Specifications (SWS) Aligned Edition Version (083021), The CT WAP Operations Manual (Revised 2022) and the current Year State Plan/Master File.

Link: <https://portal.ct.gov/-/media/DEEP/energy/weatherization/Connecticut-Weatherization-Assistance-Program-Field-Guide-2021.pdf>

[2022-Connecticut-Weatherization-Assistance-Program-Operations-Manual.pdf](#)

In PY22, DEEP will overhaul the existing Connecticut WAP Operations Manual to reflect the increase in the scale of operations to accommodate servicing multi-family buildings across the State.

In accordance with WPN 22-4, Connecticut WAP will provide Subgrantees and/or contractors with technical requirements for fieldwork including, but not limited to, audit/testing policy and procedures; installation of energy conservation measures (ECM), H&S, and incidental

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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 Connecticut WAP Subgrantees and/or contractors must be consistent with Connecticut WAP SWS aligned Field standards and SWS aligned Field Guides.

Connecticut WAP has provided electronic links on the program webpage to the Connecticut WAP Quality Work Plan, Connecticut Weatherization Field Guide SWS Aligned Edition (083021) and the Connecticut WAP Operations Manual (Revised 2022) Edition and the Current year State Plan/Master File as part of the executed agreement between the Grantee and subgrantee and the subgrantee and direct hire contractors.

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

Connecticut WAP has produced work quality standards that continuously align with DOE WPN 22-4, The CT WAP Quality Work Plan, CT Weatherization Field Guide SWS Aligned Edition (083021), and the current year State Plan/Master File.

Connecticut WAP Monitoring shall conduct an ongoing assessment of Subgrantee staff and contracted resources to ensure that all personnel engaged in installed measures are aware and practicing work standards in compliance with DOE WPN 22-4, The Connecticut WAP Quality Work Plan (2022), The Connecticut Weatherization Field Guide SWS Aligned Edition (083021), The Connecticut WAP Operations Manual (Revised 2022) Edition and the current year State Plan/Master File.

Connecticut WAP Monitoring shall ensure that 100% of weatherized homes are inspected in compliance with DOE WPN 22-4, The Connecticut WAP Quality Work Plan (2022), The Connecticut WAP Weatherization Field Guide SWS Aligned Edition (083021), The CT WAP Operations Manual (Revised 2022) Edition and the current year State Plan/Master File.

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

Additional Program Information

During PY22 spending limits have been established as follows:

- Up to \$10,000 on ECMs, including Ancillary and Incidental Repair Measures and Program Support Costs, or submit a request for prior Grantee Approval.
- Up to \$1,500 for H&S Measures or submit a request for prior Grantee approval.
- Up to \$2,500 for Incidental Repair Costs or submit a request for prior Grantee approval.

Definitions of allowable repairs are as follows:

Major Repairs: 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: 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: Repairs that may be considered Incidental Repair measures, under \$500 may include cut and finish, access to attics and knee walls, siding repairs, and minor repairs associated with windows, doors, flashing, and masonry moisture infiltration points.

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

Note: See WAP Operations Manual Section 311 and Section 702

Example contract language used in all Subgrantee contracts:

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

Field guide types approval dates

Single-Family: 8/13/2021

Manufactured Housing: 8/13/2021

Multi-Family:

V.5.2 Energy Audit Procedures

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

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.

Approval Date: 8/27/2020

Audit Procedure: Multi-Family

Audit Name: Other (specify)

CT WAP is exploring implementing the use of Mul-TEA audit tool for multi-family buildings in the coming year.

Approval Date:

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.

State-level Experts continue to closely monitor the NEAT audit tool proficiency of all Subgrantees. SWS aligned QWP-22 Setup libraries will be distributed by July 15, 2022.

* Multifamily: During Program Year 2022, CT WAP will continue to direct Subgrantees to refer all large multifamily weatherization requests to the state's utility-based weatherization programs, which can provide comprehensive weatherization services to these sites. CT WAP will submit to DOE for approval any multifamily project deemed eligible for services.

V.5.3 Final Inspection

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The Connecticut 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, QWP22) and the Connecticut WAP Inspection Tracker PY22 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 **10%** of all completed units.

Connecticut WAP policy maintains that QCI In-Process Monitoring will be conducted on 10% of all production units as well. CRT and NOI complete QCI's on all homes reported to our office.

Note: All Final QCI Inspection conducted on work performed and reported as DOE completed ConnecticutWAP sites must be in compliance with DOE WPN 22-4 and the Connecticut WAP Quality Work Plan requirements, Connecticut WAP Weatherization Field Guide SWS Aligned Edition (083021), and the current year State Plan/Master File.

Attendees 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 Connecticut WAP approval.

Failure of any person to achieve QCI Certification will result in a temporary suspension from additional "comprehensive" training opportunities. Please see attached Connecticut WAP Quality Control Inspection Report (QCI QWP-22) and Connecticut WAP Quality Work Plan.

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

- Independent QCI: This individual has no direct involvement in the prior work on the home either as the Auditor or as a member of the installation crew. A Grantee or DOE-approved representative or third-party QCI will perform at least 5% of all completed units.
- Independent Auditor/QCI: The Auditor who performs the audit and creates the work order also performs the final QCI inspection. The auditor cannot be involved in actual installation of measures at the site.

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

During PY22, Connecticut WAP anticipates an increasing volume of unit completions throughout the PY. The existing Subgrantee staffing provides two dual role Auditor/Inspector(s). The ConnecticutWAP Training Plan for PY2022 includes training to ensure an additional two Auditor/Inspector(s). Connecticut WAP will monitor the program at a minimum of 10% of all completed units and assess inspection quality and capacity throughout PY22.

For additional information see the response to V.8.4 Training and Technical Assistance Approach (PY 2022 Comprehensive Training).

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.

A simple rating system has been developed to quantify the extent of the failed QCI Inspections as related to local agency Inspections and installed measures.

- One (1) asterisk * is noted for any missed opportunity or single installed measure deficiency.
- Two (2) asterisks ** are noted for any singleH&S missed opportunity or deficiency in addressing H&S issues found at the site.
- Three (3) asterisks *** are noted for any combination of deficiencies found to require immediate corrective actions.

Note: Scoring will be compiled both before and after corrective actions have been undertaken.

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

- Level 1: Subgrantee and or Subcontractor has routinely responded to corrective actions 100% effective.
- Level 2: Subgrantee or Subcontractor has had marginal or insufficient results responding to corrective actions on initial responses.

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Subgrantee or Subcontractor ultimately addresses all concerns and demonstrates improvement (subject to increased monitoring and inspection).

- Level 3: Subgrantee or Subcontractor has failed to address corrective actions and or deficiencies repeatedly. (Resulting in temporary suspension and disallowed costs).
- Level 4: Indefinite suspension, defunding of Subgrantee, and Subcontracted resources.

V.6 Weatherization Analysis of Effectiveness

All Connecticut analyses of effectiveness will be conducted in compliance with DOE WPN 22-4 and the CT WAP Quality Work Plan (2022) requirements, CT WAP Weatherization Field Guide SWS Aligned Edition (083021), and the current year State Plan/Master File. There is an 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 20-4, 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 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; and jobs are tracked regionally to ensure adequate and fair coverage across the entire State.

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

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

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 town or serving Subgrantee, is expected to receive the same quality service. The State reserves the right to terminate or alter the service area of any subgrantee that cannot meet statewide standards.

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

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

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

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

Connecticut WAP is continually working with in-state utility partners to evaluate installed 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 services 16,000 - 20,000 income-eligible homes per year, and CT DEEP and the utilities are continuously working to standardize requirements between the service delivery models.

A continuous improvement approach is used to monitor the Subgrantee(s) in the context of limited capacity that has been demonstrated by a relatively small number of community action agencies actively involved in weatherization assistance programs in the state. CT DEEP is committed to monitoring the effectiveness of the Subgrantee(s) to improve service delivery.

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V.7 Health and Safety

Connecticut WAP has implemented policies and procedures to address health and safety considerations. These are included in the CT WAP Operations Manual: Sec. 400 Health and Safety (QWP 2022) (WPN 22-7).

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

Connecticut WAP has begun to develop Training and Technical Assistance Planning to address the post-COVID-19 workplace challenges. As federal and state policy is implemented, Connecticut WAP will respond as needed to remain in compliance with all authorities governing WAP service delivery, the current T&TA budgets have been reviewed and allowances have been made for Health and Safety training specific to this demand and will be tracked accordingly.

V.8 Program Management

V.8.1 Overview and Organization

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

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

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

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

BETP administers the State Energy Program (SEP) grant, generally by the same office that administers WAP.

HUD/ housing programs are administered through the Connecticut Department of Housing.

V.8.2 Administrative Expenditure Limits

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

For PY22, CT WAP will be distributing the Administrative allocation as follows:

- DEEP – 5%
- Community Renewal Team – 5%

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- New Opportunities, Inc. – 5%

V.8.3 Monitoring Activities

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

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

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

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

Programmatic and Management Monitoring

- The CT WAP Operations Manual (2022) Sections 300, 400, 500, 600, and 800 and the CT WAP SWS-aligned Field Guide (2022). WPN: 22-4

Subgrantee Monitoring

- The CT WAP Operations Manual (2022) Sections 100, 300, 400, 500, 600, and 700 and the CT WAP SWS-aligned Field Guide (2022).

CT WAP utilizes WPN 20-4, 22-4, and attachment 1 updated Checklists and Operations Manual content specific Subgrantee monitoring activities.

Note: During the current program year, Connecticut WAP will continue to adjust monitoring activities commensurate with the quality of work and the progress demonstrated by the subgrantee. Subgrantee monitoring will accept WPN 20-4 and 22-4 Guidance and all other applicable DOE Guidance. Connecticut WAP will perform comprehensive onsite monitoring statewide on an annual basis. Records reviews at the subgrantee's office will involve multiple visits and may be focused on regions of the state, resulting in separate annual monitoring events according to region. At a minimum, there will be a total of at least 12 days of onsite monitoring.

In alignment with WPN 20-4 and 22-4, more frequent monitoring will be conducted at Subgrantees that have been identified as having significant deficiencies. The individual onsite monitoring activities are structured as follows:

- Comprehensive Administrative/ Fiscal Monitoring (annual) based on PY22 allocation.
- Technical Site Visit Monitoring (minimum of 10% of completed units and a minimum of 20% file review of completed units)

Note: While this exceeds DOE minimum standards, the recent audit tool implementation and QWP22 standards compliance warrant additional activities to ensure the best outcomes. Actual program year totals may be adjusted to DOE minimum levels if midyear assessments indicate consistent acceptable performance at any Subgrantee.

Connecticut WAP will utilize contracted QCI services via a T&TA Subgrantee to conduct QCI inspection of at least 10% of all reported DOE completed units. As part of our contract(s) with Subgrantees and as a part of our annual monitoring visit, Connecticut WAP requires the Subgrantee to submit their most recent 2 CFR 200 Financial Audit. These audits are reviewed and approved by DEEP's Business Office. Connecticut WAP will continue to contract the services of a Technical and Monitoring Compliance Consultant via a T&TA Subaward(s) to provide all Quality Control Inspections and field monitoring services. A dedicated, fulltime, Technical Monitor, employed or contracted by DEEP will continue to provide monitoring and support services under the direction of Weatherization Program Management. Connecticut WAP anticipates that Subgrantees will utilize components of the DOE prescribed standard options to conduct Quality Control Inspections as defined in WPN 22-4.

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

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

Contracted resources:

- Two (2) Contractors who serve as Quality Control Inspector/Technical Monitoring Compliance Consultant/Technical Support
- Full time, 40 hours/week
- 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	Workforce development and outreach
Compensation	State and Federal funding
Travel/Training Funding	100% Federal funding

Position	Associate Research Analyst
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 instruments prepared specifically for use in Connecticut. Technical monitor(s) possess BPI EA/QCI certifications.

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

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 five regions being reviewed for a complete statewide review.

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

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

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

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

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

- Consistent production of substandard workmanship, with no measurable improvement within 90 days of notification.
- Inadequate Fiscal and or Management policy, procedures, enforcement or controls.
- Failure to improve current Management systems within stated notification time frames and or implementation of corrected policy, procedures, and practices.

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

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

By consolidating multiple site visits and file review visits, DEEP estimates that 12 onsite visits will be needed statewide. Overnight stay is not required to conduct Subgrantee site visits in CT.

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

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

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

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

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

- CT WAP Audit Checklist
- CT WAP Installer Checklist
- CT WAP BWR Review form
- CT Field Monitoring Tool for Field and OnSite Field Review
- CT WAP Field Visit Form
- DOE WPN 20-4 and 22-4

Note: All Technical Compliance Monitoring will be conducted in compliance with DOE WPN 224 and the CT WAP Quality Work Plan (2022) requirements, CT WAP Weatherization Filed Guided SWS Aligned Edition (083021), and the current year State Plan/Master File and USDOE WPN 227 Health and Safety Guidance.

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

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

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

Written Monitoring reports delivered to Subgrantee will contain specific details for corrective actions and response times not to exceed 30 days of receipt of notifications. Any response directed to Subgrantee fiscal management that fails to address corrective act on requests within the given time limits will result in disallowed costs of any stated discrepancy. Any disallowed cost will be deducted from subsequent monthly invoicing until resolved to the satisfaction of CT WAP Monitoring. Further, a Subgrantee's failure to respond to a corrective action plan for significant findings will result in an increased number of monitoring visits and an increased frequency of visits until the corrective action is resolved and the State is fully satisfied.

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

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

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

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

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

V.8.4 Training and Technical Assistance Approach and Activities

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

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

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

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

Lead Safe Weatherization (LSW) training for all workers (Optional)

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

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

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

Connecticut WAP Recognizes DOE WPN 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.

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

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Percent of overall trainings

Comprehensive Trainings:	60.0
Specific Trainings:	40.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	25.0
Percent of budget allocated to Crew/Installer trainings:	50.0
Percent of budget allocated to Management/Financial trainings:	25.0

V.9 Energy Crisis and Disaster Plan

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

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

The State acknowledges that the use of WAP funds during a disaster is limited, as outlined in WPN 12-7.

The primary energy-related crisis facing low-income households in CT is an inoperable heating system during the heating season defined as (October 1 - April 30). WAP eligible households will receive priority service delivery to conduct comprehensive site-specific health, safety, and energy efficiency assessments and initiate heating system diagnostics and repair or replacement proposals. Connecticut WAP Subgrantees will ensure that appropriate actions are taken to address heating-related responses in a timely manner and deliver high-quality comprehensive weatherization to all sites receiving emergency heating services.

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

Allowable expenditures are limited to measures as defined in:

- 10 CFR 440.16 (b)
- 10 CFR 440.18 (D) (15)
- DOE WPN 22-7
- The Current CT WAP State Plan/Master File

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

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

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

Connecticut WAP will also provide longterm (90-180 day) guidance with respect to the use of DOE WAP training and technical assistance funds for the purpose of maintaining the integrity and capacity of the Connecticut WAP service delivery network at the State and Local agency levels and report all costs within the respective program year.

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IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Community Renewal Team, Inc. (Hartford)	\$1,588,602.00 134
New Opportunities, Inc. (Waterbury)	\$1,400,240.00 123
Total:	\$2,988,842.00 257

IV.2 WAP Production Schedule

Planned units by quarter or category are no longer required, no information required for persons.	
Weatherization Plans	Units
Total Units (excluding reweatherized)	<input type="text" value="257"/> 257
Rewatherized Units	<input type="text" value="0"/> 0
Average Unit Costs, Units subject to DOE Project Rules	
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B Total Units Weatherized	257
C Total Units Reweatherized	0
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	257
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	\$2,054,129.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	257
H Average Program Operations Costs per Unit (F divided by G)	\$7,992.72
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J Total Average Cost per Dwelling (H plus I)	\$7,992.72

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	257	29.3	7530
Prior Year Estimate	1095	29.3	32084
Prior Year Actual	326	29.3	9552

Method used to calculate savings description:

Connecticut utilizes the DOE Algorithm from the ORNL/TM-2014/338 national evaluation.

IV.4 DOE-Funded Leveraging Activities

In previous program years DOE funds were set aside for leveraging with non-federal resources to replace heating systems for DOE eligible homeowners whose present heating systems needed replacement. Since leveraging funds are not to be used for the payment of weatherization materials installed in a

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home, Connecticut ceased setting aside funds for this activity. The state will now replace heating systems in eligible owner occupied homes if an SIR of one or more is achieved or under the Health and Safety category. The utility companies will still continue to pay a portion of the replacement cost.

IV.5 Policy Advisory Council Members

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

Connecticut AARP	Type of organization: Non-profit (not a financial institution) Contact Name: Nora Duncan Phone: 8602957279 Email: nduncan@aarp.org
Connecticut Association for Community Action	Type of organization: Non-profit (not a financial institution) Contact Name: Deb Polun Phone: 86083294341 Email: deb@cafca.org
Connecticut Commission on Women, Children, Seniors, Equity, and Opportunity	Type of organization: Unit of State Government Contact Name: Steven Hernandez Phone: 8609005800 Email: steven.hernandez@cga.ct.gov
Connecticut Energy Marketers Association	Type of organization: Non-profit (not a financial institution) Contact Name: Christian A. Herb Phone: 8606132041 Email: chris@ctema.com
Connecticut Natural Gas Corp.	Type of organization: Utility Contact Name: Lisa Rosso Phone: 8605248361 Email: lrosso@berkshiregas.com
CT Local Administrators of Social Services	Type of organization: Non-profit (not a financial institution) Contact Name: Joy Hollister, Vice Chairman Phone: 8608703128 Email: jhollister@ellington-ct.gov
Department of Energy and Environmental Protection	Type of organization: Unit of State Government Contact Name: Victoria Hackett Phone: 8608272687 Email: victoria.hackett@ct.gov
Dept. of Social Services	Type of organization: Unit of State Government Contact Name: Cassandra Norfleet-Johnson Phone: 8604245408 Email: cassandra.norfleet-johnson@ct.gov
Eversource Energy (Electric)	Type of organization: Utility Contact Name: Theresa Washington Phone: 8002862000 Email: theresa.washington@eversource.com
Eversource Energy (Gas)	Type of organization: Utility Contact Name: Joanne Whistnant Phone: 8002862000 Email: joanne.whistnant@eversource.com
Legal Assistance Resource Center	Type of organization: Non-profit (not a financial institution) Contact Name: Wendy Wanchak Phone: 8604561761 Email: wwanchak@connlegalservices.org
Norwich Public Utilities	Type of organization: Utility Contact Name: Ruth Swift Phone: 8608872555 Email: ruthswift@npumail.com
Office of Consumer Counsel	Type of organization: Unit of State Government Contact Name: Tyra Peluso Phone: 8608272900 Email: tyra.peluso@ct.gov
	Type of organization: Unit of State Government

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Office of Policy and Management	Contact Name: Danielle Palladino Phone: 8604027576 Email: danielle.palladino@ct.gov
Operation Fuel, Inc.	Type of organization: Non-profit (not a financial institution) Contact Name: Brenda Watson Phone: 8602432345 Email: brenda@operationfuel.org
Public Utilities Regulatory Authority	Type of organization: Unit of State Government Contact Name: Frank Augeri Phone: 8608272611 Email: frank.augeri@ct.gov
Southern Connecticut Gas	Type of organization: Utility Contact Name: Jaime Soto Phone: 8662682887 Email: jaime.soto@uinet.com
The United Illuminating Company	Type of organization: Utility Contact Name: Kathleen Wasilnak Phone: 8007225584 Email: kathleen.wasilnak@uinet.com
United Way of Connecticut	Type of organization: Non-profit (not a financial institution) Contact Name: Lisa Tepper-Bates Phone: 8605717500 Email: lisa.tepperbates@ctunitedway.org

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

04/20/2022 The Public Notice for the Connecticut Weatherization Assistance Program (CT WAP) State Plan was issued on April 10, 2022 and was provided to US Department of Energy (DOE) and the Connecticut Association of Community Action (CAFCA). It was also sent to Connecticut's Public Advisory Council (PAC) Low-Income Energy Advisory Board (LIEAB) for distribution. The notice invited public comments through April 30, 2022, and announced a Public Hearing to be held April 20, 2022.

IV.7 Miscellaneous

Recipient Business Officer: Joe Stein

joseph.stein@ct.gov

(860) 424-3559

Recipient Principal Investigator: Kyle Ellsworth:

kyle.ellsworth@ct.gov

(860) 827-2856

The Low-Income Energy Advisory Board (LIEAB) is Connecticut's PAC. They meet on the first Wednesday of alternating months. At the April 2022 LIEAB meeting, Kenyetta Risser-Lovings, CT WAP Team Director, will present the 2022 application and solicit any feedback and recommendations from the Board.

The Notice of Public Hearing and Notice of Opportunity for Written Comments (Notice) for the CT WAP public hearings provided the public with detailed information including the date, time, and location of the hearings, notice of an opportunity to provide verbal and written comment on the CT WAP State Plan, and information stating that the State Plan could be reviewed and accessed on the CT WAP website. The Notice itself was distributed to the public using multiple methods. It was posted

U.S. Department of Energy
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WEATHERIZATION ANNUAL FILE WORKSHEET

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on the CT WAP website and on the Secretary of State public agency calendar. In addition, the Notice was posted on DEEP's energy filings website. Finally, the Notice was personally sent as an attachment to the Low Income Energy Advisory Board (LIEAB) distribution list. LIEAB is designated as CT WAP's PAC, and many of CT WAP's key stakeholders make up its membership.

The State of Connecticut established a Low-Income Energy Advisory Board, in accordance with Connecticut General Statutes Sec. 16a-41b, to assist the Office of Policy and Management and the Department of Social Services 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 regarding the impact of utility rates and policies and the Low-Income Weatherization Assistance Program.

CT WAP PY'22 Application WRF Narrative-Draft-5-2-22

1) Develop a WRF Plan for DOE approval. The Plan must describe how funds will be distributed and how households will be prioritized for WRF. Grantees must outline any restrictions related to the funding and describe how the Grantee will monitor WRF activities. Additionally, the WRF plan must include a maximum amount per home or identify the WRF Average Cost per Unit (WRF ACPU) specific to WRF budget category to be set by each Grantee. (WRF funds are outside WAP's historic ACPU.) Please submit your WRF plan in Section IV.7 Miscellaneous of the PY 2022 Annual File. DOE encourages Grantees to consult with Subgrantees and Policy Advisory Councils when setting this policy for statewide application.

Built off the success of a pilot program jointly implemented by CT DEEP and CT DSS in 2018, CT WAP will leverage Weatherization Readiness Funds (WRF) to deploy the H&S Audit Tool (Oakridge National Laboratory) across deferrals captured in PY21 lists. Deferred properties will be clustered into a "WRF Portfolio" of eighty-five (85) buildings (see attached deferral lists) to identify those measures for which weatherization work should be delayed until corrective actions are taken. CT WAP has determined that budgeting up to **\$2,310 per dwelling unit (\$196,386 ÷ 85)** will cover the cost to deploy the H&S Audit Tool and conduct additional assessments. The sampling, testing and reporting on observed environmental hazards are components of the WRF cost structure as well.

The prioritization of deferred properties will be determined before PY22 begins. CT WAP will use existing criteria for weatherization assistance to prioritize PY21 deferred properties and will refine prioritization parameters in view of the recent expansion of client eligibility pursuant to WPN 22-5.

CT WAP consulted with sub-grantees and technical consultants to understand the unique characteristics of the Program's H&S deferral lists from PY21. The Program discovered variances between sub-grantee lists, such as proposed H&S barriers to remediate and the geographic distribution of deferred properties within sub-grantee coverage areas. These variances emerged because the sequence of operations for how energy audits are conducted by sub-grantee organizations differ. Utilizing Oakridge National Laboratory's (ORNL) H&S Audit Tool will standardize the sequence of auditing steps, providing CT WAP with a more comprehensive understanding of energy opportunities for the entire building before remediation takes place.

Connecticut WAP is approved to service manufactured housing and single-family homes (1 to 4 units) and will focus on properties with these characteristics. PY21 deferred projects will be grouped in a WRF portfolio to track progress at PY and property levels. Grouping PY21 deferred properties in a portfolio will also prevent to use BIL funds with formula funds according to WPN 22-6.

2) Track these funds for each building and unit, and at a minimum, capture measures/repairs and associated costs, for reporting purposes. DOE WAP is subject to the Paperwork Reduction Act and final tracking requirements and data collection will follow the appropriate Information Collection Request (ICR) process to gain approval. DOE will solicit feedback from the WAP network. Weatherization Program Notice 22-6 3

CT WAP will utilize a combination of tools to track spend on WRF and to capture measures, repairs and

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WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0009892, State: CT, Program Year: 2022)

costs for reporting purposes and for continuous process improvement. CT WAP will operationalize the *DOE Deferrals Classification Guide Tracker* across the Program and will create a historical cost database to track trends in pricing for removing H&S barriers. Costs for measures and repairs also will be captured in the PY22 vendor procurement process for sub-grantees, and CT WAP will eventually automate the WRF tracking process with energy program delivery software.

3) Monitor these funds as part of the Grantee's annual monitoring of Subgrantees, ensuring the funds are expended in accordance with the Grantee's WRF plan for the purposes approved by DOE, resulting in completed units.

CT WAP will ensure all monitoring activities will be conducted in compliance with DOE guidance and the CT Quality Work Plan requirements. CT WAP will utilize contracted QCI services to conduct on-site inspections of at least 10% of completed units. In addition, CT WAP will perform comprehensive file reviews on at least 20% of completed units throughout the program year. Fiscal monitoring will be conducted monthly as part of the normal monthly reporting review process as well as annually during the annual subgrantee monitoring. Any findings of waste, fraud, or abuse will be reported to DOE immediately.

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: CT Grant Number: EE0009892 Program Year: 2022

Name: **Community Renewal Team, Inc.**

Contact: Elizabeth Vinick, Weatherization Program Manager

UEI: JILMNQDSGLM6

DUNS: 077309516

Address: 555 Windsor St.
Hartford, CT 06120-0000

Phone: (860) 560-5635

Fax: (860) -

Email: vinicke@crtct.org

Counties served: NEW LONDON County
TOLLAND County
MIDDLESEX County
HARTFORD County
WINDHAM County

Tentative allocation: \$ 1,588,602.00

Planned units: 134

Type of organization: Local agency

Congressional
districts served:

CD
CT-05
CT-02
CT-01
CT-03

Source of labor: Contractors

Name: **New Opportunities, Inc.**

Contact: Joanne Balaschak

UEI: TALCJ8JEC8L4

DUNS: 010154367

Address: 232 North Elm Street
Waterbury, CT 06702-0000

Phone: (203) 575-4215

Fax: (203) 575-4235

Email: JBalaschak@newopportunitiesinc.org

Counties served: NEW HAVEN County
LITCHFIELD County
FAIRFIELD County

Tentative allocation: \$ 1,400,240.00

Planned units: 123

Type of organization: Local agency

Congressional
districts served:

CD
CT-04
CT-05
CT-03

Source of labor: Contractors

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009892		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Connecticut 79 Elm Street Hartford, CT 061065127		4. Program/Project Start Date 07/01/2022	5. Completion Date 06/30/2023

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. DOE 2022 WAP Formula Funds	81.042	\$ 0.00		\$ 3,608,954.00		\$ 3,608,954.00
2. STATE			\$ 0.00		\$ 0.00	\$ 0.00
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,608,954.00	\$ 0.00	\$ 3,608,954.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRA TION	(2) SUBGRANTE E ADMINISTRA	(3) PROGRAM OPERATIONS	(4) HEALTH AND SAFETY	
a. Personnel	\$ 76,679.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 76,679.00
b. Fringe Benefits	\$ 72,200.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 72,200.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 30,000.00
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	\$ 350,208.00	\$ 2,054,129.00	\$ 308,119.00	\$ 3,398,506.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 5,000.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 5,000.00
i. Total Direct Charges	\$ 153,879.00	\$ 350,208.00	\$ 2,054,129.00	\$ 308,119.00	\$ 3,582,385.00
j. Indirect Costs	\$ 26,569.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 26,569.00
k. Totals	\$ 180,448.00	\$ 350,208.00	\$ 2,054,129.00	\$ 308,119.00	\$ 3,608,954.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009892		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Connecticut 79 Elm Street Hartford, CT 061065127		4. Program/Project Start Date 07/01/2022	5. Completion Date 06/30/2023

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		\$ 0.00	\$ 0.00	\$ 3,608,954.00	\$ 0.00	\$ 3,608,954.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) LIABILITY INSURANCE	(2) FINANCIAL AUDITS	(3) GRANTEE T&TA	(4) SUBGRANTE E T&TA	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 76,679.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 72,200.00
c. Travel	\$ 0.00	\$ 0.00	\$ 30,000.00	\$ 0.00	\$ 30,000.00
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	\$ 20,000.00	\$ 10,000.00	\$ 409,664.00	\$ 50,000.00	\$ 3,398,506.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 5,000.00
i. Total Direct Charges	\$ 20,000.00	\$ 10,000.00	\$ 439,664.00	\$ 50,000.00	\$ 3,582,385.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 26,569.00
k. Totals	\$ 20,000.00	\$ 10,000.00	\$ 439,664.00	\$ 50,000.00	\$ 3,608,954.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009892		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Connecticut 79 Elm Street Hartford, CT 061065127		4. Program/Project Start Date 07/01/2022	5. Completion Date 06/30/2023

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		\$ 0.00	\$ 0.00	\$ 3,608,954.00	\$ 0.00	\$ 3,608,954.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) Weatherization Readiness	(2)	(3)	(4)	
a. Personnel	\$ 0.00				\$ 76,679.00
b. Fringe Benefits	\$ 0.00				\$ 72,200.00
c. Travel	\$ 0.00				\$ 30,000.00
d. Equipment	\$ 0.00				\$ 0.00
e. Supplies	\$ 0.00				\$ 0.00
f. Contract	\$ 196,386.00				\$ 3,398,506.00
g. Construction	\$ 0.00				\$ 0.00
h. Other Direct Costs	\$ 0.00				\$ 5,000.00
i. Total Direct Charges	\$ 196,386.00				\$ 3,582,385.00
j. Indirect Costs	\$ 0.00				\$ 26,569.00
k. Totals	\$ 196,386.00				\$ 3,608,954.00
7. Program Income	\$ 0.00				\$ 0.00