

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0007935		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Executive Office of the State of New Hampshire Office of Strategic In 107 Pleasant Street Concord, NH 033013834	4. Program/Project Start Date 07/01/2019		
	5. Completion Date 06/30/2022		

**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 2019 & 2020 &2021 WAP Formula Funds	81.042	\$ 174,636.00		\$ 5,688,504.00		\$ 5,863,140.00
2.						
3.						
4.						
5. TOTAL		\$ 174,636.00	\$ 0.00	\$ 5,688,504.00	\$ 0.00	\$ 5,863,140.00

**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	\$ 145,346.00	\$ 0.00	\$ 160,553.00	\$ 0.00	\$ 305,899.00
b. Fringe Benefits	\$ 73,195.00	\$ 0.00	\$ 106,105.00	\$ 0.00	\$ 179,300.00
c. Travel	\$ 500.00	\$ 0.00	\$ 18,800.00	\$ 0.00	\$ 19,300.00
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	\$ 437,752.00	\$ 297,475.00	\$ 347,100.00	\$ 5,118,746.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 41,646.00	\$ 0.00	\$ 39,634.00	\$ 0.00	\$ 81,280.00
i. Total Direct Charges	\$ 260,687.00	\$ 437,752.00	\$ 622,567.00	\$ 347,100.00	\$ 5,704,525.00
j. Indirect Costs	\$ 71,268.00	\$ 0.00	\$ 87,346.00	\$ 0.00	\$ 158,614.00
k. Totals	\$ 331,955.00	\$ 437,752.00	\$ 709,913.00	\$ 347,100.00	\$ 5,863,139.00
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		\$ 174,636.00	\$ 0.00	\$ 5,688,504.00	\$ 0.00	\$ 5,863,140.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3)	(4)	
a. Personnel	\$ 0.00	\$ 0.00			\$ 305,899.00
b. Fringe Benefits	\$ 0.00	\$ 0.00			\$ 179,300.00
c. Travel	\$ 0.00	\$ 0.00			\$ 19,300.00
d. Equipment	\$ 0.00	\$ 0.00			\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00			\$ 0.00
f. Contract	\$ 3,881,948.00	\$ 154,471.00			\$ 5,118,746.00
g. Construction	\$ 0.00	\$ 0.00			\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00			\$ 81,280.00
i. Total Direct Charges	\$ 3,881,948.00	\$ 154,471.00			\$ 5,704,525.00
j. Indirect Costs	\$ 0.00	\$ 0.00			\$ 158,614.00
k. Totals	\$ 3,881,948.00	\$ 154,471.00			\$ 5,863,139.00
7. Program Income	\$ 0.00	\$ 0.00			\$ 0.00

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**WEATHERIZATION ANNUAL FILE WORKSHEET**

(Grant Number: EE0007935, State: NH, Program Year: 2019)

**IV.1 Subgrantees**

Subgrantee (City)	Planned Funds/Units
Community Action Program Belknap-Merrimack (Concord)	\$795,665.00 81
Southern New Hampshire Services, Inc. (Manchester)	\$1,868,189.00 200
Southwestern Community Services, Inc. (Keene)	\$719,504.00 74
Strafford County Community Action Committee, Inc (Dover)	\$412,929.00 42
Tri-County Community Action Program, Inc. (Berlin)	\$1,024,984.00 107
<b>Total:</b>	<b>\$4,821,271.00</b> <b>504</b>

**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="504"/> 504
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	504
C Total Units Reweatherized	0
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	504
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	\$3,881,948.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	504
H Average Program Operations Costs per Unit (F divided by G)	\$7,702.28
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J Total Average Cost per Dwelling (H plus I)	\$7,702.28

**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	504	29.3	14767
Prior Year Estimate	228	29.3	6680
Prior Year Actual	192	29.3	5626
<b>Method used to calculate savings description:</b>			
<div>The method used to estimate energy savings is the DOE WAP algorithm, which is based upon national Weatherization Assistance Program evaluations to</div>			

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**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

estimate energy savings per dwelling unit. This method estimates 29.3 MMBTU for total annual energy savings for each weatherized dwelling unit.

The actual total estimated savings, based on an average cost per unit of \$7,700 and a total of 504 weatherized dwelling units completed over the course of the three program years which are incorporated into PY19 Rev 2, is 14,767 MMBTU.

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

In PY19 Rev 2, New Hampshire will not be devoting any DOE funds to seeking out additional leveraged funding sources.

**IV.5 Policy Advisory Council Members**

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

Belknap Merrimack Community Action Agency, Inc.	Type of organization: Non-profit (not a financial institution) Contact Name: Chris Vought Phone: 6032253295 Email: <a href="mailto:cvought@bm-cap.org">cvought@bm-cap.org</a>
Community Action Partnership of Strafford County	Type of organization: Non-profit (not a financial institution) Contact Name: Bob Arnold Phone: 6034352550 Email: <a href="mailto:barnold@straffordcap.org">barnold@straffordcap.org</a>
Eversource	Type of organization: Utility Contact Name: Frank Melanson Phone: 6036342890 Email: <a href="mailto:frank.melanson@eversource.com">frank.melanson@eversource.com</a>
Liberty Utilities	Type of organization: Utility Contact Name: Matt Minghella Phone: 6032163573 Email: <a href="mailto:Matthew.Minghella@libertyutilities.com">Matthew.Minghella@libertyutilities.com</a>
NH Community Loan Fund	Type of organization: Non-profit (not a financial institution) Contact Name: Tara Reardon Phone: 6032246669 Email: <a href="mailto:treardon@communityloanfund.org">treardon@communityloanfund.org</a>
NH Electric Cooperative	Type of organization: Utility Contact Name: Phil LaMoreaux Phone: 6035368856 Email: <a href="mailto:lamoreauxp@NHEC.com">lamoreauxp@NHEC.com</a>
NH Governor's Commission on Disability	Type of organization: Unit of State Government Contact Name: Louise McBride Phone: 6032712773 Email: <a href="mailto:louise.mcbride@nh.gov">louise.mcbride@nh.gov</a>
NH Housing Finance Authority	Type of organization: Other Contact Name: Gloria Paradise Phone: 6033109315 Email: <a href="mailto:gparadise@nhhfa.org">gparadise@nhhfa.org</a>
NH Legal Assistance	Type of organization: Non-profit (not a financial institution) Contact Name: Stephen Tower and Ray Burke Phone: 6032062214 Email: <a href="mailto:stower@nhla.org">stower@nhla.org</a>
NH Office of the Consumer Advocate	Type of organization: Unit of State Government Contact Name: James Brennan Phone: 6032711172 Email: <a href="mailto:James.Brennan@oca.nh.gov">James.Brennan@oca.nh.gov</a>
Southern NH Services, Inc.	Type of organization: Non-profit (not a financial institution) Contact Name: Ryan Clouthier Phone: 6036688010 Email: <a href="mailto:rclouthier@snhs.org">rclouthier@snhs.org</a>
	Type of organization: Non-profit (not a financial institution)

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
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**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

Southwestern Community Services, Inc.	Contact Name: Gabriel Leonard Phone: 6037194286 Email: <a href="mailto:gleonard@scshelps.org">gleonard@scshelps.org</a>
The Resilient Buildings Group	Type of organization: Non-profit (not a financial institution) Contact Name: Dana Nute Phone: 6032261009 Email: <a href="mailto:dnute@resilientbuildingsgroup.com">dnute@resilientbuildingsgroup.com</a>
Tri-County Community Action, Inc.	Type of organization: Non-profit (not a financial institution) Contact Name: Gerald Miliken Phone: 6037527001 Email: <a href="mailto:jmiliken@tccap.org">jmiliken@tccap.org</a>
Unitil	Type of organization: Utility Contact Name: Ben Stephenson Phone: 6032945172 Email: <a href="mailto:stephenson@unitil.com">stephenson@unitil.com</a>

**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

04/26/2021 The Public Hearing was held on April 26, 2021 and advertised in the NH Union Leader on Thursday, April 15, 2021 and posted on the OSI website at the same time. Meeting minutes are attached to this application as well as proof of posting.

**IV.7 Miscellaneous**

Recipient Business Officer:

Jane Lemire

Business Director

NH Office of Strategic Initiatives

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(603) 271-1098

[Jane.Lemire@osi.nh.gov](mailto:Jane.Lemire@osi.nh.gov)

Recipient Principal Investigator

Kirk Stone

Weatherization Program Manager

NH Office of Strategic Initiatives

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107 Pleasant Street

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**U.S. Department of Energy**  
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Allocation Formula for Distribution of Funds to Subgrantees

The establishment of a process for allocating WAP dollars to Subgrantees is done at the Grantee level and communicated in the State Plan. In PY21 OSI is using the same formula to allocate funds among the five NH Subgrantees that we have used for several years. The formula determines base grant, T&TA, and administrative allocations for OSI and for the Subgrantees.

The allocation formula includes these three variables:

- The number of certified Fuel Assistance Program (FAP, funded by LIHEAP) applications, by county, in the prior year;
- Each county's percentage of the state's population with incomes below 200% of the Federal Poverty Guideline (using the most recent American Community Survey estimates of individuals below the poverty line); and
- Each county's percentage of the state's average heating degree days (HDD) from 1981-2010 (we do not yet have access to results from the 2020 census so will continue to rely on 2010 data).

Data weights:

County percentage of total number of statewide certified FAP applications: 60%

County poverty percentage of total state poverty population: 20%

County average HDD percentage of the HDD average total for all counties: 20%

Example:

Using actual statewide data for a previous year:

Total prior year certified FAP applications: 29,791

Total population at or below 200% of designated FPG: 260,257

Total average heating degree days: 77,026

Hypothetical Subgrantee: Weighted average

Number of certified FAP applications:  $4,500 / 29,791 = .15$   $.15 \times .6 = .090$

Population at designated FPG:  $34,000 / 260,257 = .13$   $.13 \times .2 = .026$

County average HDD:  $8,500 / 77,026 = .11$   $.11 \times .2 = .022$

Example Total Subgrantee allocation 13.8%

The formula results in the following NH Subgrantee allocation percentages:

CAP Belknap-Merrimack Counties, Inc. 16.5%

Community Action Partnership of Strafford County 8.6%

Southern New Hampshire Services, Inc. 38.7%

Southwestern Community Services, Inc. 14.9%

Tri-County Community Action Program, Inc. 21.3%

TOTAL: 100.0%

Allocation Formula Update

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

The numbers in the allocation formula are generally updated annually. OSI uses the most recent prior year's certified FAP application data, along with updated FPG population data using the most recent 5-year data from the American Community Survey. OSI updates Heating Degree Day data after each decennial census.

**Miscellaneous Rules Regarding Allocation Management**

1. After the initial allocation, the NH Office of Strategic Initiatives (OSI) may, at any time during the program year, reduce or eliminate funding available to a Subgrantee as a result of:
  - a). Failure to meet, without adequate explanation, quarterly goals for two (2) consecutive quarters when compared to approved production schedules and budgets (specifically variances in excess of 20%);
  - b). Significant and/or repeated deficiencies discovered during field inspections or Subgrantee on-site monitoring;
  - c). Repeated poor quality and/or ineffective workmanship documented but not corrected as directed;
  - d). Evidence suggesting that a Subgrantee may be operating the program without adequate safeguards to minimize the risk of inefficiencies, waste, fraud, or abuse of DOE funds; or
  - e). Failure to comply with federal or state program requirements including 10 CFR 440, 2 CFR 200 and other relevant federal, state, or program rules and regulations.
2. OSI may redistribute grant funds that have been retracted from a Subgrantee, and/or funds which have been determined to be in excess of OSI's required budget necessary to manage the program, at its discretion but within Program regulations, after the initial allocation has been made.
3. A Subgrantee that has been fully defunded within a program year as a result of documented actions or activities that are contrary to the Program requirements may lose eligibility for future funding. In this circumstance, OSI may seek an alternate Subgrantee(s) to provide weatherization services in the affected areas or solicit bids from qualified contractors.
4. In the event of a reduction in New Hampshire's PY21 federal funding, OSI may, after calculating Subgrantee allocations, further negotiate final funding allocations with all Subgrantees.
5. If a Subgrantee is not funded for any portion of PY21, that Subgrantee will be considered for funding in the next program year if deficiencies have been addressed and OSI is satisfied that remedial measures have been implemented.

**NH WAP: Three major collaborations:**

14. Home Energy Assistance (HEA) program of the NH regulated utilities
14. NH LIHEAP
14. Lead Hazard Control and Healthy Homes Program of the NH Housing Finance Authority

Collaboration with utility funding: The NH Weatherization Assistance Program works in parallel with the larger low-income weatherization program managed by the state's electric and gas utilities under the supervision of the New Hampshire Public Utilities Commission. The budget for the ratepayer-funded Home Energy Assistance (HEA) program has recently been five to seven times larger than the WAP program budget and continues to grow each year. Both programs rely on New Hampshire's Community Action Agencies (our Subgrantees) for service delivery, and the Subgrantees have become expert at combining these two funding sources, and others, to maximize the number of low-income households served across the state. The two programs rely on each other; WAP funding alone would reach far fewer households than is possible by collaboration. When a WAP-approved energy audit has been conducted on a home, and when that home has received at least one energy conservation measure paid for at least partially with WAP dollars (meaning that the energy conservation measure has met the savings to investment ratio test), then the entire job (using HEA or other dollars), once it has been inspected and declared complete by a BPI-certified QCI, may be considered a WAP completion.

Because OSI does not manage the utility-administered program or have any jurisdiction over the ratepayer funds, these leveraged funds are part of a budget entirely separate from OSI.

The Average Cost per Unit, however, does reflect how the program works on the ground. More than 90 percent of WAP projects have blended funding streams (WAP, HEA, and often other sources, including local funds, CDBG funds, and some LIHEAP funds transferred to weatherization). In PY21, OSI is using \$7,700 as the ACPU for determining the number of homes that each of the Subgrantees will be expected to complete over the course of the year using at least some DOE funds. We estimate that by the end of PY21, using that \$7,700 average WAP cost per unit, the total number of units that will have been completed with at least some WAP money over the three-year period of this State Plan will be 504. A very few of these will be projects entirely funded by WAP, typically in communities

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

with municipal utilities which do not participate in the Home Energy Assistance program. Completing these homes with only WAP funds tends to raise the ACPU. And there are, of course, many more homes completed by the CAPs using only HEA funding.

The collaboration between WAP and other programs works remarkably well and ensures that the Department of Energy's exacting quality control measures apply to far more jobs than would be the case if Subgrantees did not combine funding streams when possible.

The collaboration between WAP and HEA also ensures that the spending of training and technical assistance (T&TA) money, which is available through both programs, is planned for and coordinated together as much as possible, for the benefit of Subgrantee personnel and their crews and contractors. PY21 will see a ramping up of cooperative training activities across the state and among all of the Subgrantees. HEA and WAP T&TA dollars complement each other well: HEA money is particularly valuable for training that needs to take place on relatively short notice, due to a need in the field, or to the availability of an instructor, or to some other reason that may not have been known about in time for DOE money to become involved.

Some minor challenges arise from this collaboration, however, including "counting" the number of units completed and administering what amounts to two separate inspection and reporting structures. In PY21 OSI anticipates continuing the work toward obtaining a state-wide WAP management software system to address some of the coordination challenges faced in our work with the state's utility programs, while also improving our ability to track and report on program implementation at all levels.

Collaboration with LIHEAP funding: The New Hampshire Weatherization Assistance Program also benefits from an important collaboration and leveraging of resources with the New Hampshire Fuel Assistance Program (FAP). FAP receives its funding through the Low-Income Home Energy Assistance Program (LIHEAP) which is managed nationally by the US Department of Health and Human Services (HHS). NH FAP has, for many years, annually provided funds to WAP Subgrantees for weatherization purposes. These funds were traditionally targeted at repair or replacement of residential heating systems, reducing the need to use WAP funds for those purposes. Starting in PY19, however, the uses to which LIHEAP funds transferred to WAP could be put was expanded so that heating repairs and replacements were still addressed, but the funding – called the Building Weatherization Program (BWP) – also became available to support broader, whole house, weatherization measures. Continuing in PY21, OSI will allocate BWP funds to NH WAP Subgrantees using the same allocation formula that determines the WAP allocation. OSI anticipates using at least \$550,000 in FAP money for this purpose in PY21, the same as in PY20.

OSI's FAP allocation for New Hampshire from the Department of Health and Human Services has always been needed and used almost entirely for low income fuel assistance benefits across New Hampshire. However, OSI annually evaluates the possibility of using more of New Hampshire's LIHEAP allocation to augment the Weatherization Assistance Program and its long-term improvements to low-income housing stock. DHHS rules allow states to move up to 15% of LIHEAP funding into weatherization work. For PY21, the three most likely ways in which NH WAP may benefit from NH LIHEAP dollars are:

- 1). The transfer of a standard base amount of funds from LIHEAP use to the WAP-managed Building Weatherization Program (BWP) for addressing deficiencies in all areas of low income home energy efficiency, including especially space and water heating systems.
- 2). The possible additional transfer of unspent LIHEAP dollars into BWP work if the NH LIHEAP Manager determines that those dollars will be unable to be spent as FAP benefits before the close of the LIHEAP funding period.
- 3). WAP client eligibility screening is accomplished at the same time as FAP eligibility is assessed, so any one client is not required to undergo two screenings. WAP is entirely dependent upon FAP (LIHEAP) eligibility screening for the discovery of eligible WAP clients, which amounts to a sizable personnel and financial savings for the Subgrantee WAP budgets.

Collaboration with the Lead Hazard Control and Healthy Homes Program of the NH Housing Finance Authority (NHHFA): Midway through PY19, the NH Weatherization Assistance Program began a collaboration with the NH Housing Finance Authority's Lead Hazard Control and Healthy Homes Program to identify dwellings which may qualify for lead hazard mitigation and removal attention. That collaboration will continue in PY21. WAP rules define and limit the type and scope of weatherization-related work which may be done on homes which contain lead hazards. The collaboration with the Lead Hazard Control and Healthy Homes Program will provide two important benefits. 1) Training support will be available for weatherization installers to ensure that they have the knowledge and certifications to safely accomplish weatherization work when lead paint is present; 2) A direct line of communication will be established between workers in the field, who may encounter buildings containing significant lead hazards, and the Agency in the state responsible for evaluating lead risk in buildings where children under 6 years of age and pregnant women reside and then informing the owner where to get information regarding mitigation and abatement services.

In addition, collaboration with NHHFA may provide access to unoccupied homes in the state where weatherization training and certification testing could be done. Currently, New Hampshire-based training for some weatherization positions is limited or unavailable due to the lack of appropriate in-state housing in which to provide the necessary training and testing to certification standards. NHHFA has offered to help with the search for appropriate homes for these purposes.

Subgrantee critiques of OSI: ACSI results in 2016 and 2019 and OSI's activities to improve Program management and Subgrantee satisfaction

In New Hampshire's WAP PY16, US DOE utilized the American Customer Satisfaction Index (ACSI) to survey WAP Subgrantees all around the country for the first time. The survey provided Subgrantees the opportunity to give DOE and its Grantees constructive feedback on various aspects of Grantee management of program operations and to identify opportunities for improvement. And as a result, OSI developed action items to address the issues and opportunities raised by



**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

the Subgrantees. Those action items included agreement that improvements would be sought over the next two to three years in two primary areas:

14. The provision of additional training by third-party WAP professionals.
14. The improvement of communication in two key areas:
  - o Better, more useful, feed-back regarding work plans, performance, and monitoring.
  - o Improved communication about WAP policies, procedures, and regulations.

In PY19, those action items committed OSI to:

14. Provide, or point out opportunities for, professional third party WAP training on WAP topics that appear in the results of our T&TA needs assessment survey.
14. Encourage our QCI-certified T&TA contractors – one currently providing “roving mentor” services to all Subgrantees on a variety of technical practices needed in the field, and the other providing technical monitoring assistance to OSI – to continue work begun in PY17 providing direct and professional feedback to Subgrantee employees and contractors regarding auditing, TREAT modeling, work plan development and communication to the installers, final inspections, program compliance, monitoring issues, contractor management techniques, etc.
14. Increase the frequency of communications to the Subgrantees on issues relating to both national and local WAP policies, procedures, and regulations. This included: forwarding of DOE and NASCSP communications, newsletters, and notices; better use of OSI’s existing “Subgrantee Notices” process for disseminating Program information, changes to policies, procedures, and practices; etc.
14. Provide an opportunity approximately halfway through the program year for Subgrantees to informally evaluate OSI on these improvements and to suggest additional changes that would enhance Subgrantee participation in and understanding of the Weatherization Assistance Program’s operation in the local, state, and national arenas.
14. Encourage participation in the follow-up PY19 ACSI survey, administered by the US DOE and its survey contractor, to see if work since the PY16 survey contributed to program improvements.
14. Re-establish, after many years of inactivity, the NH Weatherization Technical Committee, to provide a regular and expected venue for evaluating and making recommendations about technical issues and protocols.

Early in the course of PY19, DOE administered the second round of the American Customer Satisfaction Index (ACSI) survey, seeking a follow-up evaluation of Grantees (like OSI) by Subgrantees (like the NH CAPs) all over the country. The results of the PY19 survey were released in September, 2019, and the NH Weatherization Assistance Program was found to be improved in almost all areas covered.

14. NH’s overall index number went up 11 points over the outcome in the first evaluation, from 78 to 89, which the administrators of the ACSI called “significant.” That score put NH in the first quartile of all states.
14. The most significant “driver” of satisfaction in NH is deemed to be communication, and NH’s score in this category was also up a “statistically significant” amount over the earlier evaluation (when it was already considered to be good).

The outcome of this second survey indicated that NH’s Program needs improvement primarily in:

14. Training provided by third parties, and in
14. Distribution of funds

For PY21, the work to provide more training utilizing third parties, which was planned for PY20 but had to be significantly reduced in scope due to the pandemic, will continue. Training provided by third parties will be a significant factor in implementing the PY21 T&TA plan. NH is seeking to develop a more comprehensive and long-term strategic T&TA plan, to guide our training choices in a more organized way, such as in looking out over a number of years to be sure that third party training becomes a cyclical and recurring feature of the state’s training effort, coordinated with the utility programs, periodic needs assessments, etc.

On the “distribution of funds” topic, the NH WAP work is managed from a state executive agency and must function under the rules and procedures established for all fiscal planning and transactions in the state, which includes the requirement that all contracts in excess of \$10,000 must be approved by a vote at a meeting of the Governor and Executive Council. Getting on the agenda of one of those meetings is a long and involved process, requiring time and care to ensure that documentation will pass the stringent reviews undertaken by the state’s Department of Justice and Department of Administrative Services over approximately the one month time period prior to the meeting. However, OSI is moving to better anticipate those meetings, attempting to bring WAP funding into the process as soon as the contract amounts with the CAPs can be calculated but prior to the money actually being in-hand at the state level. We hope, by these efforts, to get WAP contracts in front of the Governor and Executive Council by the end of each June so that approval is achieved even before the start of the new WAP program year on July 1, and sometimes before the money has been received by the state. OSI cannot distribute the money before it has been received, but we hope that an earlier start will mean that OSI is ready and approved to do the distribution as soon as the money is available.

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

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

For the purpose of determining client eligibility in the NH Weatherization Assistance Program, the definition of "low income" is as follows:

The NH Weatherization Program determines income eligibility under the Low Income Home Energy Assistance Act of 1981 and uses the NH Fuel Assistance application to determine eligibility. Eligibility takes into consideration income and family size in accordance with criteria established by the Director of the Office of Management and Budget (OMB). Income eligibility for the WAP program is set at a maximum of 200% of the federal poverty guideline (FPG).

It is anticipated, however, that in PY21 OSI will be able to increase that eligibility ceiling so that it becomes equal with the income eligibility ceiling in place for the Fuel Assistance Program, or FAP, with funding from LIHEAP. Currently, the FAP ceiling is set at 60% of the state median income (SMI), an amount considerably higher than 200% FPG. And the other important low-income programs in NH, like the utilities' HEA, and the Public Utilities Commission's Electric Assistance Program (EAP), also serve clients with incomes no greater than 60% SMI. The difference between those programs and WAP means that there are FAP and HEA and EAP-eligible clients served by our Subgrantees who are not also eligible for WAP services. We plan to address this discrepancy promptly.

Describe what household eligibility basis will be used in the Program

The current WAP income guidelines are available at: <http://www.nh.gov/oepp/energy/programs/fuel-assistance/eligibility.htm>

Eligibility to receive weatherization services through the WAP is based on five (5) requirements:

1. The household's primary residence must be in New Hampshire;
2. The household income level must not exceed 200% FPG;
3. The household size must be reported accurately;
4. The physical dwelling must not have benefited from weatherization services more recently than 15 years prior to the anticipated start date for additional services.
5. The housing structure's eligibility must be evaluated and found acceptable (see section 2.5 of the NH Policies and Procedures Manual, and Section V.1.2 in this Plan).

Final determination of eligibility for the WAP does not take place until either: 1) a home energy audit has been completed by a properly credentialed Weatherization Program Energy Auditor or a Building Analyst; or 2) the home energy auditor determines from visual inspection and/or interaction with the client that a home energy audit need not be done because the house cannot be weatherized until significant improvements, beyond the scope of WAP funding, are completed, or other causes for a deferral decision are addressed (see section on deferral process below).

So determining eligibility for weatherization takes place in two steps: first, eligibility of the client household based on the FAP application, and second, eligibility of the dwelling structure following an assessment by the Energy Auditor.

Based on the American Community Survey data for PY19, individual population eligibility at or below 200% FPG is identified below by New Hampshire county:

Coos County: 29,467 people

Grafton County: 83,815 people

Carroll County: 48,386 people

Sullivan County: 42,539 people

Cheshire County: 71,554 people

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

(Grant Number: EE0007935, State: NH, Program Year: 2019)

Belknap County: 60,639 people

Merrimack County: 144,948 people

Hillsborough County: 408,711 people

Rockingham County: 305,969 people

Strafford County: 120,467 people

State-wide total: 1,316,495 people

The American Community Survey identifies approximately 247,658 people in New Hampshire, or approximately 19 percent of the population, who live at or below 200% of the Federal Poverty Guideline.

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

NH Fuel Assistance applications are used for determining client eligibility for WAP. The Fuel Assistance Program (FAP) has procedures in place to ensure that Non-Qualified Aliens do not receive benefits, which ensures that WAP also complies with these requirements.

An individual with Qualified Alien status is counted as a household member when determining FAP eligibility. Income from a Non-Qualified Alien household member must be documented and included as household income, but the Non-Qualified Alien is not counted as a household member. All information must be documented in the client file by the Subgrantee.

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

Procedures to determine that units weatherized have eligibility documentation

The Subgrantee determines when a unit is eligible for weatherization and documents that determination process in the client file.

The NH Policies and Procedures Manual (NH PPM) includes a list of the information and documents that must be maintained in the client file. This includes, but is not limited to, the client's initial application, client priority scorecard, electronic audit report, auditor's project notes, work orders, and final inspection notes and report. OSI's monitoring inspection of Subgrantee performance always includes a review of these client files to ensure that Subgrantees are properly determining and documenting unit eligibility.

A qualified dwelling is eligible for weatherization services if it:

1. Is occupied by an eligible household or will become an eligible dwelling unit within one hundred eighty (180) days under a federal, state, or local government program for rehabilitating the building or making similar improvements to the building (the 180-day rule only applies to rentals, not to owner-occupied units); and
2. Has not received weatherization services more recently than 15 years prior to the anticipated start date for additional work; and
3. Does not require deferral (deferral does not necessarily prevent the building from receiving WAP services in the future if all deferral conditions are satisfied prior to receiving WAP services).

Describe Reweatherization compliance

Generally, WAP services are provided only once for each dwelling unit. However, DOE regulations allow that units may be reweatherized under certain conditions. To be re-weatherized, a unit must meet all the criteria for "normal" weatherization: both the client and the building must be found to be eligible, a new audit must be conducted using the DOE-approved audit tool, the work plan must be implemented properly, and a final inspection by a BPI-certified Quality Control Inspector must declare the project complete. Units that are reweatherized will be counted toward the per-unit average cost but must be tracked separately from newly weatherized units.

Section 1011(h) of the federal Energy Act of 2020, amended 42 U.S. Code § 6865(c)(2) and removed the former reweatherization date, September 30, 1994,

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

to create a “rolling” option.

Dwelling units weatherized (including dwelling units partially weatherized) under the Weatherization Assistance Program, or under other Federal programs (such as LIHEAP, HUD, or USDA), must not receive further financial assistance for weatherization until arrival of the date that is 15 years after the date on which such previous weatherization work was completed.

Previously weatherized dwelling units are not precluded from receiving some WAP assistance and services, including the provision of information and education services to assist with energy management and evaluation of the effectiveness of installed weatherization materials, but additional weatherization energy conservation measures may not be installed in these dwellings using WAP or other federal funds until the 15-year waiting period has elapsed. Use of non-federal funds is not precluded.

In New Hampshire, the responsibility for tracking previously weatherized dwellings belongs to the Subgrantee in whose service territory the previously weatherized dwellings are located. Each Subgrantee’s tracking system is slightly different, and each will need to be modified in order to meet the new requirement to also track the spending of LIHEAP, HUD, and USDA money on dwellings in those territories. OSI will initiate a process to ensure that NH WAP Subgrantees are equipped to track these additional streams of federal money. OSI also supports all efforts to revise the language in this legislation so that only WAP dollars need to be tracked by entities managing WAP allocations.

It is important to keep in mind that it is possible for a particular homeowner/renter to receive WAP services more than once inside the 15-year time frame if those services are delivered at different dwelling sites.

New Hampshire allows no more than 10% of a Subgrantee’s annual production quota to include reweatherized units.

Describe what structures are eligible for weatherization

A dwelling must be a structure, which may include a stationary manufactured home, an apartment, a group of rooms, or a single room occupied as separate living quarters, a single-family or multi-family building (including historic properties), and qualified shelters or other group facilities. The dwelling must have a physical address in New Hampshire.

Government institutions, halfway houses, nursing homes, recreational vehicles (RVs), cars, trucks, or tents are not eligible dwellings and are not eligible for weatherization services. Properties having only a commercial use are also not eligible for weatherization.

Describe how Rental Units/Multifamily Buildings will be addressed

Subgrantees that identify multi-family buildings for weatherization should refer as many tenants as possible to the Fuel Assistance Program and encourage them to complete a FAP application. This can increase the number of eligible units in the building and maximize available funding for the building.

Within the constraints of the program, a Subgrantee shall provide services to buildings that have rental dwelling units occupied by eligible program participants, or which have dwelling units that are expected to be occupied by eligible program participants within one hundred eighty (180) days of completion of the weatherization work. A Subgrantee shall weatherize the entire multi-family building when the building is eligible; individual units are not eligible for weatherization.

The owner/agent’s permission to perform weatherization services must be obtained through the use of the New Hampshire WAP Landlord-Tenant Agreement prior to the start of any weatherization work (including the energy audit) on all rental property. The New Hampshire WAP Landlord-Tenant Agreement must be signed by the appropriate parties including all tenants, and copies must be retained in Subgrantee client files. The benefits of weatherization are intended for and expected to accrue primarily to the low-income tenants residing in such units. This Agreement contains a one-year rent protection feature that prohibits landlords from raising rent based on weatherization-related improvements/costs. Tenants are encouraged to contact the appropriate Subgrantee if they believe that the provision has been violated.

No undue enhancement shall occur to the value of the rental unit.

Project Approval Required for Some Multi-family Projects

Project approval from OSI is required when a Subgrantee intends to use DOE money to weatherize any single building that contains five or more units.

Subgrantees must submit to OSI a completed TREAT “. tpg” file, a narrative, and a Multi-Family Project checklist form. OSI will work with DOE to determine whether weatherization services may proceed on multi-family buildings of 5 units or more. Subgrantees must receive OSI’s written project approval, which will be passed along from DOE, prior to starting any weatherization work, other than the initial audit. on a multi-family project consisting of five units or more.

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

**Mixed Eligibility**

Production credit will be provided for all units weatherized within an eligible multi-family building. Units in a building with five units or more should be reported as multi-family units. Units in buildings of fewer than five units are also considered to be multi-family units but should be separately identified when reported as complete.

Building eligibility is dependent upon applicant eligibility and the building structure. Whole buildings qualify for weatherization when the following occurs:

- 1) 66% or more (50% or more for two to four-unit buildings) of the dwelling units in the building are occupied by eligible applicants; or
- 2) 66% or more of the dwelling units will be occupied by eligible households within one hundred eighty (180) days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building. Subgrantees must contact OSI to request permission to utilize this qualification process.

Due to the building-as-a-system principle, multi-family buildings which do not submit easily to the weatherizing of individual units, due to building structure or configuration, shall not have weatherization work undertaken on individual units. Weatherization shall not occur on any multi-family building or portion of a building, including individual eligible units, if minimum building eligibility requirements are not met.

**Describe the deferral Process**

The decision to defer work in a dwelling unit is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be deferred until the problem(s) creating the need for deferral are resolved and/or alternative resources are found to address the problem(s). Subgrantees should strive to work with applicants to resolve conditions where a deferral is necessary. Subgrantees should not defer service due to the presence of a hazard without pursuing reasonable options to identify other resources to address the identified hazard(s). Whenever appropriate, educational information on how to address the hazard should be shared with the occupant. An example of educational materials is the EPA booklet "Renovate Right."

When service is deferred, the owner or occupant must be notified in writing and should be given a reasonable time-frame to correct the problem. Examples of reasonable time-frames would be thirty (30) days for housekeeping concerns or ninety (90) days for major remodeling work. All correspondence relating to the decision to defer must be kept in the client file. On a deferred unit, pictures documenting the reason for deferral are required and must be maintained in the client file.

If a Subgrantee cannot or chooses not to weatherize a dwelling unit, the Subgrantee must, within 5 working days of this determination, notify the client and/or owner/authorized agent in writing using a descriptive letter, setting out the reason(s) for the deferral and the circumstances under which that deferral will be lifted.

Notification must be sent by certified mail. The notification must include the following information at a minimum:

- 1) The reason for the deferral and how the reason relates to the determination to not weatherize the unit.
- 2) Any corrective action required before weatherization services can be re-instated. The requirements for rectifying the deferral must be reasonable and appropriate to the severity of the situation being addressed.
- 3) A time limit for correcting problems so that weatherization services may be rescheduled. The expiration of the client's FAP eligibility must be kept in mind when setting deadlines.
- 4) A copy of the Subgrantee's dispute resolution procedure.

Any eligible applicant who complies fully with the requirements set out in the deferral letter shall be reinstated in the Subgrantee's work system so weatherization work can progress as soon as reasonably possible. There is no time extension on the client's eligibility period due to a deferral.

For PY21 (PY19 Rev 2), New Hampshire WAP has adopted the deferral guidance and tracking template developed by the US DOE and will maintain current tracking at each Subgrantee as well as an aggregated number at OSI. OSI will report to DOE on the status of this deferral tracking process using whatever schedule is preferred by DOE. A copy of the deferrals tracking template is attached to the SF-424.

OSI will identify deferral situations using the tracking template's guidance, but generally weatherization services are likely to be deferred when:

1. There is a question about the reported household size.

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

2. There is a question about the reported income.
3. There are health and safety issues or other barriers to serving a unit which are beyond the scope of the WAP to address and which prevent or impede the proper and complete installation of weatherization measures. In rare cases, Subgrantees may complete partial weatherization of structures with underlying health and safety problems, provided the work results in cost-effective energy efficiency gains.
4. The structural integrity of the dwelling is in a condition that prevents weatherization materials from being effectively installed.
5. The customer refuses to allow the installation of one or more energy conservation measures. Normally, in such instances, the auditor is able to explain the value of the measure to the customer's satisfaction and then proceed. If the customer still refuses, however, and the auditor determines that the customer's objections are legitimate, the auditor may direct the installation crew to skip the declined measure(s) and continue to complete the weatherization. In all such cases, the auditor must prepare a thorough summary of the reasons for the "measure skipping" and place that summary in the client file. The rationale and process must be consistent with the process defined in WPN 19-4, Attachment 8.
6. A building cannot be adequately weatherized with available funds. "Adequately" means all necessary and appropriate measures to make the weatherization successful without causing harm to occupants, workers, the building or other installed measures.

Deferral of Weatherization services may be appealed by the affected client using the process set out in the State of New Hampshire Weatherization Assistance Program Policies and Procedures Manual (Section 2.12). The appeal process is an opportunity for the client whose home has been deferred to appeal that determination, first to the Weatherization Director of the Subgrantee which deferred the weatherization services and, if unresolved at that level, the client may ask to have the decision reviewed at the OSI level as well.

**V.1.3 Definition of Children**

Definition of children (below age): **19**

**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 no federally recognized Native American Tribes in New Hampshire. The New Hampshire Weatherization Assistance Program prohibits discrimination based on race, color, religion, sex, age, national origin, marital or familial status, sexual orientation, or physical or mental disability. Therefore, low-income members of a Native American Tribe will receive Weatherization benefits equivalent to those benefits provided to other eligible low-income persons.

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

There are five Subgrantees (all are Community Action Agencies) that, together, provide weatherization and many other services to residents of all 10 counties in New Hampshire. By contracting with NH's Community Action Agencies, the Office of Strategic Initiatives (OSI) is able to ensure that eligible residents throughout the state are served by the Weatherization Assistance Program. The following Subgrantees cover the following counties:

- Community Action Program Belknap-Merrimack Counties, Inc. – Belknap and Merrimack Counties
- Community Action Partnership of Strafford County – Strafford County
- Southern New Hampshire Services, Inc. – Hillsborough and Rockingham Counties
- Southwestern Community Services, Inc. – Cheshire and Sullivan Counties
- Tri-County Community Action Program, Inc. – Coos, Grafton, and Carroll Counties

If a New Hampshire WAP Subgrantee is completely defunded during a Program Year, or if a Subgrantee is determined to be unqualified or is otherwise unable to continue operating the Program, OSI may solicit bids from eligible contractors or seek assistance from an adjacent Subgrantee to provide services to the affected service territory.

**V.3 Priorities**

Every region in New Hampshire has a waiting list for weatherization services. The number of eligible homes and households far exceeds even the combined

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

funding available through the Weatherization Assistance Program and the utility-administered Home Energy Assistance (HEA) program. This New Hampshire WAP State Plan continues the system of priority-setting among eligible households which has worked well for the last 7 years in New Hampshire. The PY21 Plan (PY19 Rev 2) continues the modifications adopted in PY15 which slightly altered how Subgrantees establish priorities. These changes have been incorporated into the 2020 (the current) edition of the P&PM.

Subgrantees are required to use the Client Priority Scorecard – for which a point-based scoring system has been developed in compliance with federal law and DOE guidance – to determine the order in which services are delivered and to ensure that the most vulnerable households are served in a timely way.

As outlined in 10 CFR 440.16, prioritizing weatherization jobs in New Hampshire relies on the following:

1. Priority for Households with a High Energy Cost Burden: The energy burden is determined by dividing the calculated heating cost shown on the FAP eligibility form by the annual income, also shown on the FAP form; if a value equal to or greater than 6% is not obtained, then recalculate including electrical utility expenses. Two (2) priority points are given when the total household energy expenditures are equal to or exceed 6% of the annual household income.
2. Priority for Elderly: One (1) priority point is given to households with elderly residents. Elderly is defined as age 60 or older.
3. Priority for Persons with Disabilities: One (1) priority point is given to households where persons with disabilities (as defined on the FAP eligibility form) reside.
4. Priority for Children: One (1) priority point is given to households where children under 19 years old reside.
5. Priority for High Energy Usage: 10 CFR 440.16 also requires that a household with high energy usage be awarded a priority point. However, based on the federal definition of a high energy user found in 10 CFR 440.3 (“High residential energy user means a low-income household whose residential energy expenditures [emphasis added] exceed the median level of residential expenditures for all low-income households in the State”) OSI is not able to implement this requirement as directed. NH data which could help determine the median level of energy expenditure for all low-income households in the state are not available.

Subgrantees will generally serve households with the highest scores first. Exceptions to this priority system may occur:

14. The widely cited encouragements which WAP Subgrantees receive from DOE, both in guidance and in 10 CFR 440, to engage in leveraging of WAP funds whenever possible, can mean that the opportunity to do that leveraging is sometimes of greater importance than strictly following the scoring results provided by the priority scorecard. When NH Subgrantees are presented with the opportunity to partner WAP money cooperatively with low income utility program money – in New Hampshire called Home Energy Assistance (HEA) – OSI allows its Subgrantees the flexibility to set aside the usual priority sequencing of jobs so that weatherization services can be coordinated efficiently and productively with HEA.
14. The rural nature of the Subgrantees’ territories and the high cost of travel between potential job sites mean that Sub-grantees may schedule production within close proximity to other WAP projects in order to achieve cost-effective scheduling of those projects, regardless of the clients’ priority score.
14. An eligible household in crisis may require immediate attention making it necessary for the Subgrantee to ignore the priority job list on a temporary basis.
14. When all else is equal, Subgrantees may look to additional distinguishing characteristics, such as length of time on the waiting list, as a way to determine job priority.

Subgrantees may not use housing type as a factor in setting priorities for service.

Several New Hampshire communities are served by municipally-owned electricity utilities that do not participate in the statewide ratepayer-funded energy efficiency programs. In these areas, utility funds are not available so leveraging with utility partners is not possible. Subgrantees report that they are reluctant to place eligible homes in these communities at a scoring disadvantage simply because HEA dollars can’t be used as leverage. In situations such as these, in which WAP money alone must be used without utility or other leveraging, the Subgrantee is empowered to use its judgment about exact placement of the job on the priority list.

#### V.4 Climatic Conditions

Climate conditions vary considerably from north to south across the state of New Hampshire. Annual Heating Degree Days (HDD) can vary from 9,600 +/- in northern NH to 7,000 +/- in southern NH. HDDs are measured using a base of 65 degrees F. Climate data representing all counties was obtained at [www.ggweather.com](http://www.ggweather.com) for the period 1981-2010. Average HDD by county is as follows:

Belknap: 7,128

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

(Grant Number: EE0007935, State: NH, Program Year: 2019)

Carroll: 8,092

Cheshire: 7,458

Coos: 9,606

Grafton: 8,137

Hillsborough: 7,043

Merrimack: 7,438

Rockingham: 6,827

Strafford: 7,047

Sullivan: 8,250

This results in an average of 7,703 HDDs per county for New Hampshire.

The approved TREAT energy audit tool provides for thirty-year average data on climatic conditions for every hour in the calendar year for the building location chosen; or the closest weather station to the building location chosen in the audit tool.

## V.5 Type of Weatherization Work to Be Done

### V.5.1 Technical Guides and Materials

The Weatherization Assistance Program in New Hampshire welcomed a new, 2020, edition of the New Hampshire WAP Policies and Procedures Manual (NH P&PM) on February 12, 2020. It remains the applicable guide for NH WAP work, generally focusing on administrative questions, and may be found here:

<https://www.nh.gov/osi/energy/programs/weatherization/index.htm>

The New Hampshire Weatherization Field Guide, 2018 edition, was put into use on November 5, 2018, and will continue to govern the technical aspects of weatherization work through November 22, 2021, when an updated NH Weatherization Field Guide, 2021 Edition, will be needed. Work to produce that new 2021 Edition of New Hampshire's Weatherization Field Guide began in PY20 (PY19 Rev 1). NH's Field Guide is fully aligned with the US DOE's Standard Work Specifications (SWS). The Field Guide is distributed in both digital format and hard copies to all Subgrantees in quantities sufficient to meet their needs. In addition, the utilities' Home Energy Assistance (HEA) program has printed multiple copies of the NH Weatherization Field Guide primarily for distribution to subcontractors doing work for Subgrantees in New Hampshire. HEA engages the same set of Community Action Programs and their weatherization contractors to complete HEA's weatherization work as does WAP.

The OSI contract with Saturn Resource Management, Inc., to produce the 2021 Edition of the New Hampshire Weatherization Field Guide includes the following milestones (all in 2021) toward completion:

- o June 15, contract signed.
- o June 30, editable PDF of first draft Field Guide presented to OSI and NH WAP from SRMI, for review and comment.
- o July 16, OSI and NH WAP complete review and submit comments to SRMI.
- o July 19 to August 13, back and forth with SRMI to iron out any changes.
- o August 16 to September 3, SRMI prepares final draft ready for DOE review.
- o September 7, OSI sends final draft to DOE for review.
- o October 22, DOE completes review.
- o October 25 to November 3, SRMI makes final adjustments and sends completed Field Guide to OSI electronically.
- o November 5, OSI posts final NH Weatherization Field Guide 2021 Edition on agency web site for use by Subgrantees and contractors.
- o OSI will seek immediate printing from State printing office, for hard copy distribution.

As was begun in PY15, OSI's PY21 (PY19 Rev 2) contracts with Subgrantees will specify that they must direct their contractors to use the current



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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

Weatherization Field Guide as instruction for field installation of energy conservation measures, and Appendix A to determine acceptable weatherization materials for work completed in New Hampshire. Our BPI-certified Quality Control Inspectors (QCI) all use the Field Guide as the basis for evaluating completed jobs. OSI will ensure compliance with the new Field Guide as part of its monitoring of each Subgrantee.

All Subgrantees receive DOE Weatherization Program Notices (WPNs) by direct subscription and/or distribution through OSI via e-mail. OSI also issues, on an as-needed basis, "Subgrantee Notices" to provide local guidance, and "Subgrantee Memoranda" to inform and educate, share best practices, etc.

All weatherization work is performed in accordance with the DOE-approved energy audit procedures (in NH that is TREAT) and 10 CFR 440 Appendix A. Approval has been received from DOE for using TREAT for single family homes, manufactured housing, and multi-family homes of no more than four units. That authority will expire in September of 2022. See next section, V.5.2, for discussion of the coming NH transition from using TREAT as the audit analysis tool to using its successor software, called Surveyor.

Field guide types approval dates

Single-Family: 11/6/2018
Manufactured Housing: 11/6/2018
Multi-Family: 11/6/2018

**V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family

Audit Name: Other (specify)

TREAT - September 30, 2016 - Tentative approval was granted, pending completion of 2018 Policies & Procedures Manual. NH uses the Targeted Retrofit Energy Analysis Tool (TREAT) for Single family dwellings.

Approval Date: 9/25/2017

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

TREAT - September 30, 2016 - Tentative approval was granted, pending completion of 2018 Policies & Procedures Manual. NH uses the Targeted Retrofit Energy Analysis Tool (TREAT) for manufactured housing units.

Approval Date: 9/25/2017

Audit Procedure: Multi-Family

Audit Name: Other (specify)

TREAT - September 30, 2016 - Tentative approval was granted, pending completion of 2018 Policies & Procedures Manual. NH uses the Targeted Retrofit Energy Analysis Tool (TREAT) for multi-family buildings with no more than four dwelling units.

Approval Date:

Comments

Weatherization services for New Hampshire's low income residents are provided and supported by essentially two programs: Home Energy Assistance (HEA) from the state's regulated utilities, and WAP, whose funding comes from DOE and is supplemented each year by a contribution from the state's Low Income Home Energy Assistance Program (LIHEAP). HEA and WAP together utilize the same five NH Community Action Programs (CAPs) as Subgrantees to manage Program implementation in the field.

By agreement many years ago, to accommodate investment by both Programs in any single project home, and to prevent the possibility of the Subgrantees having to use two different software analysis and modeling tools on the same dwelling, the Programs adopted use of the same audit software. HEA generously buys the licenses necessary for each CAP to operate the software for use in both Programs.

NH uses the Targeted Retrofit Energy Analysis Tool (TREAT), an electronic software program for aggregating energy audit data from single family, manufactured, and multi-family residential buildings. Once the audit data is entered in the software, the subject building can be modeled (recreated electronically) and then tested to find the most cost-effective set of energy conservation measures (ECMs) to be installed there. The result is then passed along to the subcontractor or installation crew and becomes the work plan for that dwelling.

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

Approval for a WAP Grantee to use any particular electronic modeling and analysis software must be obtained by each Grantee from DOE every five years. NH was last approved to use TREAT in 2017, so will need to begin another review in time to have approval in-hand by September of 2022.

TREAT has been the audit software tool in NH for many years and is becoming dated and more difficult to use than its successor from the same software developer. That successor is called Surveyor and the HEA management has begun the steps necessary to move all NH Subgrantees toward the use of Surveyor over a schedule encompassing approximately the next year. Because NH WAP is eager to make the same transition at the same time, PY21 (PY19 Rev 2) will include work with DOE on becoming approved to use Surveyor as our energy audit tool, and work with HEA to provide training to all Subgrantees in the use of Surveyor. We intend to be ready to transition to a full use of Surveyor at the same time as HEA so that Subgrantee field work will not be complicated by the presence of two modeling software tools in use at the same time and audit work can proceed synchronized in both Programs.

NH will present DOE with our proposed transition to Surveyor as our energy auditing and modeling software for WAP work here while retaining approval to continue the use of TREAT until the utility programs are also ready to move to Surveyor (and to Surveyor's necessary tracking and reporting companion tool, called Compass). NH WAP expects to be ready to move to Surveyor before the utility schedule needs us to be ready, and we will seek to retain our approved use of TREAT until that time, which will probably come in the first half of calendar 2022, well in advance of the expiration of our approval to use TREAT, which comes in September of 2022.

### V.5.3 Final Inspection

All weatherized units in New Hampshire must receive a final inspection by the Subgrantee. Units shall not be reported to OSI as complete until a satisfactory final inspection has been performed. All final inspections in PY21 (PY19 Rev 2) must be performed by a BPI-certified Quality Control Inspector in accordance with US DOE's WPN 15-4. As of March 15, 2016, all five NH Subgrantees had certified QCIs either on staff or among their contractors. All five Subgrantees will have access to BPI-certified QCIs for their final inspections in PY21 (PY19 Rev 2). OSI is budgeting PY21 T&TA funds to support the process of training and testing and maintaining a corps of BPI-certified QC inspectors to work in every region of the state. Additional details are in the section of this Plan on Training and Technical Assistance.

The purpose of the final inspection is to ensure that the weatherization work has been completed in a workmanlike manner, that it meets the requirements of the SWS, and that it has been done in accordance with the TREAT energy audit and the resulting work order for that particular building. A successful QC inspection is the essential final step in declaring a dwelling unit "completed" for payment purposes.

The final inspection must confirm the Subgrantee's documentation of the materials installed and that those materials were installed in a professional workmanlike manner in accordance with the New Hampshire WAP standards. The Satisfaction section of the Consent to Perform Work form must be signed and dated by both the client and the Quality Control Inspector who completes the final inspection. That form then becomes a permanent part of that client's file.

The US DOE's Quality Work Plan (QWP) requires that Subgrantees perform final quality control inspections, using BPI-certified Quality Control Inspectors, on 100% of completed jobs and on all accessible installed measures at each job. Those inspections must ensure that all work meets the minimum specifications outlined in the SWS in accordance with 10 CFR 440. As part of OSI's effort to ensure that all weatherization work completed in the state meets the standards and requirements of the SWS, OSI will continue the use of the following language in our PY21 (PY19 Rev 2) Subgrantee contracts:

"Effective April 1, 2015, all work performed under the Weatherization Assistance Program (WAP) in New Hampshire, using federal money from any WAP program year, must meet the minimum specifications defined in the US Department of Energy's "Quality Work Plan" (QWP) and the associated Standard Work Specifications (SWS). Details are presented in the Standard Work Specifications (SWS) for Home Energy Upgrades referred to in US DOE Weatherization Program Notice 15-4, as well as in the New Hampshire Weatherization Assistance Program's Field Guide, which governs how WAP energy conservation measures (ECMs) are to be implemented. The Subgrantee must ensure, and be able to document, that all staff and contractors who perform Weatherization work in PY21 (PY19 Rev 2) are properly trained and certified for that work and have been informed that their work must meet the requirements of the SWS or dwelling units will not be considered complete and reimbursement will not occur."

OSI monitoring of Subgrantees in PY21 (PY19 Rev 2) will include confirmation that this flow-down of responsibility is occurring in each Subgrantee's territory.

In PY15 New Hampshire put in place protocols for clearly communicating to Subgrantees the expectations against which they will be measured in regards to the implementation of technical requirements for field work. OSI procedures now require confirmation that Subgrantees have received and are committed to implementing all technical requirements and all specifications for work which will be inspected, as set out in the New Hampshire Weatherization Field Guide, which is fully aligned with the DOE's Standard Work Specifications (SWS), and the NH Policies and Procedures Manual. All agreements/contracts with Subgrantees, and all vendor contracts, must contain language which clearly identifies the specifications which must be met for acceptable weatherization work, and all contracts and agreements must include signatures acknowledging receipt and understanding of the expectations which must be consistently met in regard to weatherization work quality.

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

For PY21 (PY19 Rev 2), the final inspection process in NH is being improved in the following ways:

- Improved documentation is required of Quality Control (final) Inspectors using the revised Building Test Data Information Sheet (BTDIS), and the accompanying Narrative Assessment Form. The QC Inspector is to use the Narrative Assessment Form to provide comment on a project's more subjective expectations and attributes, as a complement to the more objective data collection placed in the BTDIS.
- The Quality Assurance Inspection (QAI), performed by a third-party contractor under the supervision of OSI and undertaken on 10% of all WAP completions during the program year, provides an opportunity to assess the work of the Subgrantees' Quality Control Inspectors who are required to declare when each job is actually complete. The QA inspection provides an opportunity to either confirm that the QCI performed a rigorous final inspection, or to point out areas in which the QCI could improve final inspection assessments and reporting.
- The NH WAP Policies and Procedures Manual provides an outline of the disciplinary steps to be taken when an individual Quality Control Inspector does not meet the expectations placed on him/her by the Quality Work Plan and associated guidance.
- The review and assessment of the original audit done on the dwelling has become a larger part of a final quality control inspection, including the TREAT modeling runs that the audit produces, in order to confirm that the measures called for in the work order were appropriate and were chosen in accordance with NH audit procedures and protocols approved by US DOE. This focus on reviewing the initial audit has the added benefit of ensuring that the QC Inspector conducts the final inspection in a way that produces, in effect, a post-weatherization "audit" of what was done in the home.
- The sign-off, "job completed," procedure, required of all final QC Inspectors, is clearly set out for easy implementation on the BTDIS.

Improved procedures also cover the requirement that the client file associated with every completed weatherized dwelling unit must contain proof that the unit had a final inspection by a BPI-certified QC Inspector, and that the inspection confirmed that all installed measures met required standards and expectations for quality weatherization work. A properly filled out and annotated BTDIS provides that assurance.

OSI Technical Field Inspections (Quality Assurance Inspections, or QAI)

Federal rules require that no less than five percent (5%) of all completed units in the state must be reviewed by OSI's Weatherization Technical Specialist or his/her designee. In cases where deficiencies are noted, OSI or its designee may, as funding allows, perform more inspections of work performed by that Subgrantee.

Starting in PY15 DOE encouraged Subgrantees to use different individuals to conduct the home energy audit and the final inspection. Because of staffing constraints in New Hampshire, our Subgrantees must continue, in part, the practice of using the same person to complete the initial energy audit and the final inspection on any one job. As a result, OSI will continue in PY21 (PY19 Rev 2) to conduct technical field inspections (Quality Assurance Inspections, or QAI) on no fewer than ten percent (10%) of all dwelling units completed in the state which meet the definition of a "WAP job"—that is, the audit and work plan were completed using the DOE-approved electronic energy auditing tool, at least one energy conservation measure passed the necessary savings-to-investment ratio (SIR) test and was installed using at least some DOE money, and the final inspection was completed by a BPI-certified Quality Control Inspector (QCI).

OSI technical field inspections, or Quality Assurance Inspections, include: reviewing the client file kept by the Subgrantee; reviewing the energy audit for thoroughness to be sure that all cost-effective measures were identified and properly installed; reviewing health and safety procedures; assessing cost-effectiveness of all installed measures; checking for compliance with the technical requirements of the program; and assuring adherence to New Hampshire's weatherization standards. OSI staff or OSI's QAI contractors are expected to utilize blower door testing, infrared scanning equipment, combustion efficiency and combustion safety testing equipment, digital cameras, and other equipment deemed necessary to provide comprehensive monitoring and inspection of completed units.

## V.6 Weatherization Analysis of Effectiveness

The DOE Quality Work Plan (QWP) provides a means for supporting and verifying quality work in the Weatherization Assistance Program (WAP). It defines what constitutes a quality installation of weatherization measures, outlines how those measures are inspected and validated, and defines acceptable training and credentialing of workers. OSI has incorporated the standards and requirements of the Quality Work Plan into the way weatherization work is implemented and evaluated in New Hampshire.

OSI reviews Subgrantee job completion effectiveness during Quality Assurance Inspections (QAI) of dwelling unit weatherization projects, both in-progress and final. In PY21 (PY19 Rev 2) OSI will conduct Quality Assurance Inspections on at least 10% of all WAP production completed in the state. Quality Assurance Inspections consider air sealing activities and the effectiveness of installed materials, paying particular attention to building air infiltration reduction through pre- and post-weatherization blower door evaluations. Verification of work, using visual inspection, blower door testing, CAZ safety testing, and the use of other technological inspection protocols and equipment, provides an important means for judging the effectiveness of on-the-job weatherization work. OSI utilizes the Quality Assurance Inspection process as a springboard for identifying shortcomings and deficiencies in weatherization work and then designing

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

direct training and technical assistance activities to address those needs that are uncovered. The QAI reporting form used in New Hampshire is attached to the SF-424.

In cases where OSI repeatedly identifies issues, then provides corrective on-site training, and subsequently observes further and continued ineffective work, OSI may require more formal training for contractors, for Subgrantees, and/or for QCIs who may be overlooking deficiencies in their final inspections.

Subgrantee productivity is measured individually by comparing approved budgets and production schedules with actual expenditures and production throughout the program year.

Requiring certification and training for auditors and other weatherization team personnel ensures continued improvement of the program as individuals are required to fulfill continuing education requirements to maintain their certifications. The continuing education component of WAP work facilitates the incorporation of best practices from across the industry, providing continued improvement and upgrades for the benefit of WAP clients. OSI also requires formal contractor installation training, though no specific certification for installers is currently required. In PY21 (PY19 Rev 2) and subsequent years, as WAP personnel positions turn over or people are motivated to seek improvements in weatherization knowledge, skills, and abilities, the New Hampshire program will encourage staff and contractors to undertake training in the Home Energy Professionals credential categories (see the section on Training and Technical Assistance).

OSI tracks Subgrantee improvement through the monitoring and inspection process. Results from current inspections and monitoring activities are compared against past reports to determine if areas of concern previously identified have been corrected. OSI or its designee may also review portions of the electronic audit files of particular jobs as part of either the field inspection, the on-site Subgrantee monitoring, or by desk monitoring, to assess whether auditors are accurately modeling buildings, measures, and costs. OSI may target monitoring and inspections and training based on prior findings.

Subgrantees not using in-house crews to perform specific work activities are to put the list of approved energy conservation measures out to public bid at least annually to provide for free and open competition among contractors seeking to provide installation services for those measures. This process may be done in conjunction with the utilities' HEA program so that contractors are assured of a consistent and equitable payment process.

Subgrantees previously identified as having challenges in complying with program goals, requirements, and/or regulations may receive training during the program year in an effort to correct areas of deficiency. A Subgrantee identified as having deficiencies will have those areas specifically reviewed in the monitoring process to determine the effectiveness of the training received.

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

The PY21 (PY19 Rev 2) New Hampshire WAP Health and Safety Plan is attached to the SF-424 as a separate document. For PY21, we anticipate that this document will expand to contain a new section to guide safe handling and use of spray foam as an insulating material, if DOE approves of our request to be allowed to add that use of spray foam to the Appendix A list of allowable materials in New Hampshire WAP work. Spray foam is already approved for use in New Hampshire as an air sealing material.

New Hampshire has not added a section to the Health and Safety Plan having to do with addressing pandemic conditions. Our Subgrantees are closely tied to the low income Home Energy Assistance (HEA) program of the New Hampshire regulated utilities, and those utilities have developed and implemented a thorough and effective program for managing weatherization work in a pandemic setting; OSI therefore feels entirely comfortable in piggybacking on that utility program. OSI is, as well, part of the executive branch of state government in New Hampshire and has fully adopted and supports the State's regimen for addressing pandemic conditions, something which the utility's programs have also done. We and the utilities and our Subgrantees, which are common to both programs, are all working from essentially the same guidance and with the same respect for and adherence to strong public health measures.

## **V.8 Program Management**

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

The NH Office of Strategic Initiatives (OSI) is a part of the Executive Branch of state government, within the Office of the Governor.

OSI is responsible for:

14. Promoting energy efficiency and reducing energy costs by supporting programs for low-income and other households, state government buildings, businesses, industry and non-profit organizations, and schools and municipalities;

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

14. Exploring opportunities to expand the use of renewable, domestic energy resources such as biomass, wind, and solar energy;
14. Offering community services such as heating fuel aid, weatherization services, floodplain management assistance, statewide population data information, and the availability of a statewide computerized geographic information system; and
14. Promoting the principles of smart growth at the state, regional, and local levels through the municipal and regional planning assistance program.

In response to these duties and responsibilities, OSI undertakes a number of programs and activities. Financial support for these programs comes from federal grants and from the State's General Fund.

OSI delivers an integrated array of federal programs including the State Energy Program (SEP) and the Weatherization Assistance Program (WAP), both supported by the US Department of Energy (US DOE), and the Low Income Home Energy Assistance Program (LIHEAP) which is supported by the US Department of Health and Human Services (HHS). The WAP and LIHEAP work in NH is 100% federally funded.

On-site Subgrantee monitoring is performed by the Program Managers with assistance from the office management, fiscal, and compliance staff as needed. Unit inspections of Weatherization Program completions may be performed by the Weatherization Program Manager, a sub-contractor, or both.

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

For PY21 (PY19 Rev 2), as a result of recent federal legislation, the allowable percentage of the NH WAP federal allocation which may be devoted to administrative expenditures has risen from 10% to 15%. In accordance with 10 CFR 440.18(e), OSI retains no more than 7.5% of annual DOE WAP grant funds for administrative purposes. The administrative budget will not exceed 7.5% of total funds awarded within an award period, except when allowed within program regulations as described below.

OSI will distribute at least 7.5% of the PY21 WAP grant allocation to Subgrantees for administrative purposes using the same allocation formula used for the base Program. Subgrantees are allowed to re-class unused or anticipated unused administrative funds, within the budgeted PY, into their Program operations budget with prior OSI approval, to weatherize additional homes.

As provided in 10 CFR 440.18(e), for any Subgrantee whose WAP allocation is \$350,000 or less, OSI allows for the use of up to an additional 5% of that Subgrantee's budget (excluding carryover) to cover administrative costs. OSI uses the following procedure to allocate the additional administrative funding:

1. OSI subtracts 15% from the total new DOE PY21 grant to cover administrative expenses (7.5% for OSI and 7.5% for Subgrantees). OSI then also reduces the award by the allowed allocation for T&TA. The resulting figure represents the minimum funding to be used for program expenditures.
2. The Subgrantee Program and Administrative allocations are calculated based on the allocation formula.
3. Subgrantees receiving less than \$350,000 in new PY allocated funds (including T&TA) may then use up to an additional 5% of their new sub-grant amount as additional administrative funds. In PY21, as in prior years, OSI will work with Subgrantees whose allocations come short of \$350,000 to assess the need for the additional 5% in administrative funds and, if necessary, build that amount into those budgets.

Unexpended administrative funds may be carried over from a prior PY within the award period, with DOE approval, but the funds will be converted to program work, not expendable on administrative activities in the new program year.

If during a Program Year OSI determines that additional funds will be distributed due to changes in the OSI budget, those funds will be issued to the Subgrantees as Program funds and will not be combined with Administrative funds except when OSI determines that additional Administrative funds are available without exceeding 10 CFR 440.18(e) limitations.

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

**OSI has redesigned its Subgrantee monitoring scheme** in response to the COVID-19 pandemic and the need for remote and virtual monitoring protocols and activities, and we have made this an opportunity to create a more efficient and thorough and supportive annual monitoring and reporting process with our Subgrantees.

OSI's monitoring activities at this writing in PY20 (PY19 Rev 1)) are being completed largely remotely, using questionnaires and teleconferencing services, with some in-person fiscal monitoring retained. These quite different monitoring activities were designed "on the fly" under the pressure of the pandemic restrictions using the guidance provided in WPN 20-4 and our experience with Subgrantee monitoring in New Hampshire. For PY21 (PY19 Rev 2) Subgrantee monitoring, OSI is solidifying and building upon the materials and processes developed in PY20 in order to further improve the Subgrantee monitoring

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

experience and to begin seriously to record and track outcomes year-by-year across the whole breadth of WAP work.

Subgrantee monitoring typically begins with a review of any findings, concerns, or recommendations identified in prior monitoring reports to help determine what actions the Subgrantee has taken to address those issues. Preparation for monitoring also includes a review of the Subgrantee's latest financial audit, to glean information that may inform the WAP monitoring.

In recent program years, the monitoring process has been implemented in New Hampshire as a positive and necessary activity, used to encourage Subgrantee weatherization best practices, rather than as a negative corrective process. In some rare instances, monitoring is needed to correct serious program implementation deficiencies. More often, however, we have found that monitoring helps identify areas where positive encouragement in the form of improved communication, training, or technical assistance is more appropriate. Monitoring is also being used to commend exemplary practices among the Subgrantees and to identify areas where the Grantee's (OSI's) program management can be improved, such as clearer policies and procedures.

So, due to the COVID pandemic, OSI switched to a largely virtual monitoring process in PY20. New features of the monitoring process will continue to be used and refined and improved in PY21 and are likely to continue in subsequent program years as well. OSI will perform PY21 (PY19 Rev 2) annual Subgrantee monitoring of all five New Hampshire Subgrantees before May 31, 2022, to allow reports to be completed and distributed before the close of the program year on June 30, 2022, and to inform changes to OSI's WAP funding application for PY22.

The primary feature of this new monitoring process is an electronic NH WAP Subgrantee monitoring questionnaire that covers monitoring topics identified by DOE in its WPN 20-4 and related "WAP Onsite Monitoring Checklist" guidance. The questionnaire was adapted specifically for NH WAP Subgrantees. A program and technical questionnaire was sent to Subgrantees early in PY20 (PY19 Rev 1), with a financial questionnaire sent in mid-PY20. The financial questionnaire is based on both DOE guidance as well as on the fiscal monitoring checklist used by OSI for many years. Both questionnaires are attached to the SF-424 of the PY21 (PY19 Rev 2) application submission. For PY21 (PY19 Rev 2) monitoring, these two questionnaires will be combined into one, covering program, financial and technical issues in a single document. PY21 (PY19 Rev 2) will also see refinement of the monitoring checklists used for collecting and examining additional data (see list in second paragraph below).

Subgrantee questionnaire responses are examined individually as well as alongside the other four New Hampshire Subgrantees. This process, compared to individual site visits, facilitates identification of exemplary practices that are given a "commendation" label. These Subgrantee best practices become opportunities for Subgrantees to learn from each other. Other questionnaire responses get noted if they need further clarity or a recommendation.

To round out the monitoring process, the self-reported questionnaire responses are combined with other monitoring data, including:

- A sampling of client files, which are inspected virtually
- Internal QCI (quality control inspection) reports, as described below
- External QAI (quality assurance inspection) reports, as described below
- TREAT computer energy modeling and work scope files
- Equipment calibration and staff/contractor certification lists
- Contracts with weatherization service providers
- Financial audits and statements
- Financial policies and procedures

The questionnaire responses and the primary data source items listed above all get analyzed in a systematic manner that is both thorough and efficient. Best practices are being commended, satisfactory work is noted, and recommendations for improvement are made. Any concerns and findings, in addition to being noted on the questionnaires or other documents, will be documented in the written monitoring letter for corrective action, as explained below. In future years, the monitoring system will be able to highlight corrective actions and other monitoring areas in need of attention – including guiding planners toward possible T&TA activities to address shortcomings – and the system will allow us to track commendations and best practices as additional possible sources for T&TA to improve the work of other Program participants across the state network.

OSI's program, technical, and financial monitoring is performed by OSI staff with outside assistance and input as needed. All monitoring activity is funded through WAP T&TA funds. Available funding and staffing will ultimately determine the method that OSI utilizes to conduct monitoring.

OSI has, for a number of years, used a contractor to perform the DOE-required technical "Quality Assurance Inspections" (QAI) of at least 10% of all completed units. For PY21 (PY19 Rev 2), OSI will be working in the second year of a two-year contract with a local quality control and quality assurance consulting firm which began its contracted work under the current contract in PY20 (PY19 Rev 1). Assuming that some NH Subgrantees will continue, at least in part, to use the same person to accomplish the initial home energy audit and the final quality control inspection, OSI will, under its contract with the quality assurance consulting firm, continue to inspect a minimum of 10% of each Subgrantee's completed units. If funding allows, OSI may inspect additional units, particularly if problems are discovered as a result of inspections of other units in the Subgrantee's territory, or if previous monitoring of the Subgrantee has indicated that additional inspections should be done to test for assurance of compliance.

Subgrantees using contractors for weatherization installation work are expected to perform in-progress safety and compliance inspections, and OSI, using its

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

QAI contractor, will perform at least two in-progress safety and compliance inspections on each Subgrantee during the course of the program year. And OSI will cooperate with the utility low income Home Energy Assistance program which is expected to conduct in progress inspections of its work, as well, some of which is completed using at least some WAP funding.

The external Quality Assurance Inspection process is also used to monitor the work of the internal BPI-certified Quality Control Inspectors (QCI) who conduct final inspections for Subgrantees. Along with a thoroughly revised BTDIS energy audit form which includes spaces for the QCI's final inspection diagnostic data, an additional new NH WAP QCI inspection form – the Narrative Assessment Form – helps document some of the more subjective but equally important observations and assessments required of a professional Quality Control Inspector. The internal QCI, along with the external QAI, help identify training and technical assistance needs, in addition to serving important quality management roles. Both the BTDIS and the Narrative Assessment Form are attached to the SF-424 associated with this PY21 NH State Plan.

OSI has developed procedures for addressing corrective actions and the process for the discipline and/or possible removal from the program of Subgrantees who are unable to meet WAP standards. In addition to its own monitoring and risk assessment activities, OSI reviews all Subgrantees' financial audits as required by 2 CFR 200 Subpart F, and OSI follows up on findings or concerns coming from either source by determining a corrective action plan and then monitoring to ensure that the actions proposed in the corrective action plan are completed satisfactorily by the date agreed upon.

OSI closely monitors Subgrantee performance and compares monthly performance data to benchmarks for the program, such as the monthly production and overall job average as compared to approved budgets and production schedules.

Each Subgrantee's technical work will be monitored on a regular basis. Additional monitoring visits will be conducted with Subgrantees which are observed to have difficulties in managing the program as required by fiscal, programmatic, and technical rules and regulations, and/or that receive findings or concerns during a monitoring or field inspection. Flexibility in scheduling will be retained to allow additional visits as needed, in order to resolve specific problems, or to facilitate training objectives.

OSI measures the performance of Subgrantees against their own goals and previous performance levels. If any Subgrantee is performing in a less than optimal manner, OSI will attempt to identify and offer or recommend appropriate training and guidance. Progress will be closely monitored by OSI's staff and compliance contractors to assure that the Subgrantee resolves the issues in question. If a Subgrantee does not make corrections as recommended or required and OSI continues to observe non-compliance, the Subgrantee will be at risk of losing funding.

Subgrantees are subject to removal from the program and will be defunded of all remaining funds if they are identified as being consistently non-compliant with program requirements, including the requirements established in a corrective action plan designed to move the Subgrantee into compliance on any issue. Non-compliance includes but is not limited to situations such as:

- Consistently demonstrating poor work quality with little or no noticeable improvement.
- Consistently displaying inadequate or improper fiscal and/or management control systems, defined as those systems which are required to ensure program compliance and reduce the potential for waste, fraud, and abuse.
- Failure to meet quarterly goals for two consecutive quarters when compared to approved production schedules and budgets (specifically, variances in excess of 20%).
- Failure to comply with federal or state program requirements including 10 CFR 440, 2 CFR 200 and other relevant rules and regulations.

Corrective action plans for these and other identified shortcomings shall establish a time frame for implementation of the corrective action, and shall provide for regular interim monitoring and check-in to mark progress toward full compliance.

A Subgrantee that is removed from the program will not be eligible to receive DOE Weatherization funds until OSI has determined that the Subgrantee has corrected its deficiencies and is prepared to manage the program effectively. OSI may seek an alternate Subgrantee(s) to provide weatherization services in the affected areas or may solicit bids from qualified contractors.

Units which are inspected by OSI as part of the Quality Assurance Inspection process (covering 10% of all completed units in the state) and found not to be in compliance with program requirements must – since they will have already undergone a final inspection and been submitted to OSI as completed units – be brought into full compliance with both the original work order and the SWS/NH Field Guide standards and requirements, all at the expense of the responsible Subgrantee, and then be re-inspected by the QA inspectors. Depending on the nature and severity of the QA findings to be corrected, a QA re-inspection may be necessary before reimbursement can take place. Failure to meet the required standards and expectations will result in the unit's removal from the Subgrantee's production completion list.

If deficiencies are found in a unit by the Subgrantee's QCI, prior to the unit's submission to OSI for reimbursement as a completion, then the Subgrantee may return to the job and make the necessary corrections and conduct a second QC inspection and the costs associated with those corrections may be included in the completed cost of the job and submitted for reimbursement.

OSI has also developed procedures for addressing deficiencies found in the performance of individual WAP personnel. The quality control inspection, for

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

instance, is essential to moving a job from the installation phase to the payment phase; without a properly done final inspection, OSI is in jeopardy of paying for work that does not meet standards and does not provide the client with the expected energy efficient, comfortable, and safe whole house outcome that is WAP's mission. If an individual Quality Control Inspector is found to consistently fall short of meeting one or a number of the expectations required of QCIs by the standards and procedures established for final inspections, OSI will:

- 14. Work with that QCI to clearly identify the problem(s);
- 14. Recommend or provide appropriate training opportunities to improve work;
- 14. Follow-up as needed to ensure compliance.

QC Inspectors who are unable or unwilling to meet expected standards and practices will not be allowed to provide QCI services in NH until compliance has been demonstrated. OSI will work with BPI to ensure that the QCI credential is not misused and to see that the holder of a QCI credential is performing to the standards expected.

Other WAP personnel, from Program Managers to office staff to Crew Chiefs and Retrofit Installer Technicians, are subject to similar review and corrective action when necessary.

Written monitoring letters are provided to the Subgrantee Executive Director, the Weatherization Program Director, and the Fiscal Officer within thirty (30) days of the completion of the monitoring visit. These reports outline specific findings, concerns, recommendations, and corrective actions as deemed necessary, and they identify commendations, and best practices. A response from the Subgrantee, if required, describing the corrective action taken or planned, must be received by OSI within thirty (30) days of the date of the report. In the case of technical or fiscal monitoring, when OSI receives no response, OSI reserves the right to disallow the cost of any discrepancy, or in the case of technical monitoring, the entire cost of the unit may be disallowed. Disallowed costs will be refunded to OSI by check or by being deducted from the Subgrantee's next monthly reimbursement request as long as that reimbursement request is for a month that is in the same program year. OSI tracks the progress of Subgrantees as they implement responses to monitoring reports.

Annually, under WPN 20-4, OSI summarizes the financial reviews, program monitoring reports, and any outstanding issues for all NH Subgrantees. This Monitoring Analysis Overview identifies the needs, strengths, and weaknesses of each Subgrantee and is made a permanent part of the Subgrantee monitoring files.

At the close of the WAP Program Year, OSI prepares the annual T&TA, Monitoring, and Leveraging Report and submits it into PAGE.

OSI estimates that it will spend about \$105,000 of T&TA money on monitoring activities in PY19 Rev 2. That is about 29% of OSI's total PY19 Rev 2 T&TA budget of \$358,725.

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

OSI T&TA activities are intended to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Assistance Program at all levels. Activities are designed to maximize energy savings, minimize production costs, improve program management and crew/contractor "quality of work," and/or reduce the potential for waste, fraud, abuse, and mismanagement. Subgrantees are the primary recipients of T&TA funds, either through direct funding or through training provided by OSI. OSI also uses T&TA funds to significantly augment, through contracting, the technical capabilities of the small OSI staff, to assist broadly with oversight of Subgrantee performance (monitoring), and, in response to the results of the ACSI survey of Subgrantees, to refine the program for improved management and efficiency in future years.

Goal: The NH WAP PY21 (PY19 Rev 2) T&TA Plan is designed to provide a transition year, moving toward a more comprehensive, multi-year, cyclical program of T&TA guidance and reminders that will provide all NH WAP staff and contractors, at both the Grantee and Subgrantee level, with regular "comprehensive" (Tier 1) as well as "specific" (Tier 2) training and technical assistance. Training and assistance will be designed to keep Program participants current and conversant with the knowledge, skills, and abilities required to properly perform the tasks expected of them, and to present opportunities for improvement, job upgrades, and recognition as professionals over a recurring three to five-year rotation of training emphases.

Analysis of Training and Technical Assistance need in New Hampshire: Training and Technical Assistance (T&TA) needs are determined through a variety of methods including: Subgrantee and Grantee ACSI Surveys, DOE Grantee monitoring, annual Subgrantee monitoring by OSI, monthly NH WAP meetings and conference calls and desk-top monitoring, NH WAP Technical Committee meetings, training event evaluations from participants, quality assurance (QA) inspection reports completed on 10% of NH WAP-funded jobs annually, and Subgrantee internal quality control inspections (QCIs) performed on 100% of NH WAP-funded jobs each year.

The NH Weatherization Assistance Program has, in addition to Program management staff, four subcontractors all involved in one aspect or another of assessing training needs, and providing or designing and arranging training activities to meet those needs. This includes a BPI-certified QCI, who, through NH



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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

WAP tutoring and mentoring services, as well as through chairing the NH Weatherization Technical Committee, provides direct input for training planning, and is often involved in providing that training. Another BPI-certified QCI, who is also a local community college workforce development manager, provides technical expertise to OSI regarding Subgrantee monitoring, including identifying T&TA needs and doing workforce assessments. A third contractor is a 30-year WAP management and evaluation veteran with experience around the country. He provides direct T&TA planning assistance to OSI, and assists with T&TA implementation that is responsive to identified needs. OSI also has a contract with a high performance building and weatherization inspection company to provide the DOE-required Quality Assurance Inspections (QAI) and to, with its QCI credentialed staff, sift through observations of finished work in the field and make recommendations to OSI regarding training needs that may be necessary to improve the quality of field work being observed.

Weatherization needs assessment efforts at the national level also help characterize and define overall T&TA training needs in New Hampshire. Necessary knowledge, skills and abilities (KSAs) are outlined in DOE's National Renewable Energy Laboratory's (NREL's) job task analyses (JTAs) for common positions in the NH WAP system. These positions include (with the most recent NREL JTA document # in parentheses):

- Energy Auditor (2018: NREL/TP-7A40-70985)
- Quality Control Inspector (2018: NREL/TP-7A40-70977)
- Weatherization Installer (Domain III in Crew Leader JTA)
- Weatherization Crew Leader (2019: NREL/TP-7A40-73578)
- Weatherization Assistance Program Administrator (JTAs built into NREL's WAP Administrative trainings)
- Heating Technicians, Electricians and other positions for which there are no specific JTAs

Competence in the performance of the tasks set out in these documents enables staff and contractors to meet the goals and requirements of the NH WAP that are presented in this State Plan, in the Policies and Procedures Manual, as well as in the NH WAP Field Guide. As part of a multiyear T&TA strategic plan, the NH Weatherization Assistance Program intends to develop more robust mechanisms to analyze the results from this wide range of T&TA needs assessment sources. In the future, T&TA needs and the planned trainings summarized in the template will be characterized according to JTA categories.

OSI does not typically directly compare productivity and energy savings across the network of WAP Subgrantees, but rather measures Subgrantee performance against each Subgrantee's own production and energy saving goals and history. Our Subgrantees are significantly different from one to the next. The largest in terms of dollars spent covers the most populace and demographically concentrated portion of the state and works with by far the greatest number of subcontractors. The smallest covers just one county and works with a shoestring budget. One Subgrantee uses its own crews and covers the largest three counties in the state, almost entirely rural, making up about half of the land mass of New Hampshire and requiring large travel time and distance costs. Productivity and energy savings expectations are established for each Subgrantee in the WAP contract with OSI at the beginning of each program year. T&TA activities are quite often derived from observation of production shortcomings at individual Subgrantees, and there are times when the discovery of a problem at one Subgrantee will generate T&TA activities that benefit the whole weatherization network.

As outlined in the Workforce Development section, below, weatherization work is expanding in New Hampshire as a result of both additional federal funding and State-authorized funding increases for the low income utility program. With additional funding will come a need for significant expansion of the weatherization workforce. While existing workers have important and identifiable T&TA needs, new workers will have even greater T&TA needs. The T&TA strategic plan being developed for New Hampshire weatherization work will bring clarity to job tasks, career pathways, and training ladders, with stacked credentials and increasing compensation frameworks for increasing responsibilities. This career clarity will also help with worker recruitment and retention.

The COVID-19 pandemic presented, and continues to present, a set of challenges which will increasingly contribute to what the T&TA needs in New Hampshire look like. Will experienced workers, who may have been laid off or furloughed because of the field work suspension, return to the weatherization workforce? Will a new cadre of workers need to be trained? Where will they come from? Presuming they will come, will our capacity to train new people, from field installers to Auditors and QCIs to office and program management personnel, grow quickly enough and without compromise of quality so that the demand can be met? How will high unemployment levels affect worker recruitment and training? Can the training infrastructure currently in place meet the training requirements of a growing weatherization work force? Will contractors see the solid and economically stable future they need to see in order to be confident about the value of investing in new weatherization trucks, more field staffing, and their ability to address increased administrative overhead management? There are many varieties of uncertainties remaining but the need for skilled and committed people is rising rapidly and is at the top of the list of things that WAP T&TA money must be buying – we seek to build a clear career pathway for new people and an attractive opportunity for experienced hands, with the actionable T&TA goals and activities that will provide a consistent flow of skilled and committed people into all weatherization positions.

Work force development: Even before the arrival of the pandemic, one of the most widely recognized and critical needs in the high performance, energy efficient building arena in New Hampshire was the identification and training of workers up and down the range of positions necessary to maintain and sustainably grow a viable and productive weatherization program. Now, funding for weatherization work appears to be expanding annually in New Hampshire, both from the US Department of Energy for WAP, and, to an even greater extent, from the NH Public Utilities Commission for the utilities' low income Home Energy Assistance (HEA) program. The opportunity to significantly improve the energy efficiency of NH's housing stock is large. And it appears at this writing that the federal government is again considering another sizeable infusion of additional WAP money into the PY21 (PY19 Rev 2) time frame. What the COVID-19 emergency's impact will be on that spending opportunity – also a significant spending challenge – remains to be seen, but as we move toward the start of PY21 (PY19 Rev 2), the NH weatherization network, including WAP, and HEA, and all the contracting organizations and firms that support that network, remains committed to finding and employing and training people to fill the critical roles necessary to be sure that NH's weatherization work is able to absorb and

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

properly use the increased funding, and to do it by providing top tier quality home energy efficiency upgrades to low income households in every part of the state.

OSI's T&TA budget for PY21 (PY19 Rev 2) includes significant support for:

- Collaboration with HEA to provide timely and targeted training for new hires into weatherization work at all levels.
- Development of a state-wide, multi-year strategic weatherization training plan, to include WAP, HEA, and the nascent and promising work of the Lakes Region Community College with the Tri-County Community Action Program to implement a new weatherization worker apprenticeship program to train new and candidate hires for long-term and sustainable weatherization employment.
- Close and continued focus on providing "on the job site" training for weatherization installation crews, whether those crews work directly for one of NH's Subgrantees, or for a private contracting firm.

NH seeking to fully expend T&TA in PY21: The last four months of PY19 (March through June of 2020) were the beginning of the pandemic and had been set aside in NH planning as the time to focus on T&TA. That plan was totally upended and our T&TA expenditures for PY19 were, as a result, lower than anticipated. PY20, from July, 2020, through this spring of 2021, has been a race to catch up on production time lost during the height of the pandemic, a time in which our Subgrantees have necessarily had to bear down on spending of both the WAP production funds and the approximately 6-7 times greater amount of low-income wxn funding from the NH utility programs. That focus on catching up has had every Subgrantee and every Subgrantee employee and contractor fully engaged with job completion tasks and we, as a Grantee, have chosen to not pull installers and others away from that essential focus (essential especially to reducing our pandemic-induced ACPU problem). Subgrantees in this period have certainly continued to obtain and maintain necessary certifications and CEUs, etc., utilizing accredited training instructors and facilities, and we are focused as a state on providing on-the-job training to crews and contractors, so that they can improve skills and abilities without being pulled away from job sites and losing work days, etc. We anticipate full utilization of T&TA funding in PY21, including engaging a significant multi-year contractor to plan and implement a comprehensive T&TA program in the state.

T&TA implementation and delivery: The New Hampshire Weatherization Assistance Program is somewhat disadvantaged by the lack of a properly accredited in-state training facility which could provide necessary training services at a more affordable cost and by bringing to the task a greater familiarity with New Hampshire's particular needs. In fact, across all of Maine and Vermont and New Hampshire there is no accredited Weatherization Training Center. Comprehensive (Tier 1) training in NH must currently include significant travel costs, for either our weatherization personnel to go out of state, or for the trainers/instructors who need to come to us if we are to have the benefit of their "comprehensive" training. NH WAP personnel generally utilize either the Green Jobs Academy training center in Massachusetts, or the New York State Weatherization Directors Association training center in Syracuse, New York. New Hampshire also benefits from the Lakes Region Community College, in Laconia, NH, which is authorized to provide some BPI training and test proctoring but is not an accredited DOE training center.

In PY21 (PY19 Rev 2), OSI will continue to seek out suitable comprehensive and specific training opportunities for at least some portion of the in-state network of weatherization staff and contractors, and we will focus as much attention as possible, given limited staffing, on the development of a longer-term, cyclical, and strategic T&TA plan for the state weatherization network – which includes the utility-sponsored low income Home Energy Assistance (HEA) program and its contractors. For PY21 (PY19 Rev 2), our T&TA Plan leans toward engaging local, less expensive, but still professional and "WAP-savvy" training resources, thereby stretching the use of T&TA dollars and increasing the number of weatherization personnel who will benefit. We have begun the discussions and the research necessary to establish a more strategic and far-reaching T&TA plan, one that takes the job task analyses that describe key weatherization positions into account over a number of years on a recurring basis and supports each of those positions with essential knowledge, skill, and ability training, certifications, and career advancement opportunities.

A particular emphasis for T&TA implementation in PY21 (PY19 Rev 2) will be the weatherization installer (the "retrofit installer technician") and crew leader positions and their interconnected job tasks. NH WAP, through encouraging the work of the Lakes Region Community College, is helping to adapt NREL's Retrofit Installer Badges Toolkit for use in New Hampshire as a way to bring credentialing to weatherization installers and their supervisors. The mini credentials with these badges fit well with both the job tasks and the learning styles of these workers. In support of this badges program, OSI will continue to emphasize on-the-job learning for installers, both internally, from crew leaders, as well as externally, from trainers who visit job sites. And this program will be supplemented with more formal hands-on installer skills training as needed.

At this time, New Hampshire is seeking to provide comprehensive (Tier 1) training from an accredited training center for each of the key weatherization positions on approximately a three-year rotation. This will be scrutinized and possibly revised as we create, early in PY21, an RFP for a T&TA administrative and management vendor. We are moving to provide more predictability and more regularity to our comprehensive training program. For PY21, the focus is on Retrofit Installers and providing on-the-job training opportunities for as many crews as we can reach. This is being done in partnership with the Home Energy Assistance (HEA) program of the consortium of New Hampshire utilities which provides weatherization services for low income residents. Almost every job with WAP money in it in New Hampshire also benefits from HEA money, and the utilities have recently moved to providing increased support for training activities.

Proposed training activities: The remaining specifics of the PY21 (PY19 Rev 2) T&TA plan are presented on the planning and tracking template provided by the DOE. That template is attached to the SF-424.

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

**(Grant Number: EE0007935, State: NH, Program Year: 2019)**

Seeking a WAP management software system: In PY21 (PY19 Rev 2), OSI will continue the effort to resolve one of the challenges facing the weatherization work generally in New Hampshire: obsolete, inconsistent, and uncoordinated data collection and management systems in use by the Community Action Agencies and by OSI. There is no central program management system for WAP at all, but OSI's Low-Income Home Energy Assistance Program (LIHEAP) is moving to upgrade its management systems in order to develop and track the performance measures required by the U.S. Department of Health and Human Services, its funding source. Our investigation into the software that will enable this work suggests that the same software could be expanded and built upon to serve the data needs of the Weatherization Assistance Program at the same time. Each of the five WAP Subgrantees in NH is also a LIHEAP Subgrantee, overseen and managed at the state level by OSI. OSI expects in PY21 (PY19 Rev 2) to develop and issue a Request for Proposals (RFP) to deal with this issue. The next step will be to acquire the software or service and to support training and implementation.

Percent of overall trainings

Comprehensive Trainings:	35.0
Specific Trainings:	65.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	25.0
Percent of budget allocated to Crew/Installer trainings:	60.0
Percent of budget allocated to Management/Financial trainings:	15.0

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

OSI is a member of the State's emergency response team, which is guided by the State of New Hampshire Emergency Operations Plan. DOE Weatherization funds are not used for either the maintenance of the plan or to respond to a general energy crisis.

OSI has reviewed WPN 12-7 and understands what activities are allowed in the event of a crisis and understands that even in the event of a crisis, DOE does not waive regulatory requirements.