

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007943		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF OHIO P.O. BOX 1001 COLUMBUS, OH 432161001		4. Program/Project Start Date 07/01/2021	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 Grant Award	81.042	\$ 1,055,642.00		\$ 16,856,226.00		\$ 17,911,868.00
2.						
3.						
4.						
5. TOTAL		\$ 1,055,642.00	\$ 0.00	\$ 16,856,226.00	\$ 0.00	\$ 17,911,868.00

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	\$ 170,443.00	\$ 0.00	\$ 222,324.00	\$ 0.00	\$ 392,767.00
b. Fringe Benefits	\$ 59,655.00	\$ 0.00	\$ 77,814.00	\$ 0.00	\$ 137,469.00
c. Travel	\$ 5,000.00	\$ 0.00	\$ 8,000.00	\$ 0.00	\$ 13,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 14,900.00	\$ 0.00	\$ 1,102.00	\$ 0.00	\$ 16,002.00
f. Contract	\$ 0.00	\$ 2,245,140.00	\$ 750,000.00	\$ 1,174,116.00	\$ 17,014,392.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 249,998.00	\$ 2,245,140.00	\$ 1,059,240.00	\$ 1,174,116.00	\$ 17,573,630.00
j. Indirect Costs	\$ 146,780.00	\$ 0.00	\$ 191,458.00	\$ 0.00	\$ 338,238.00
k. Totals	\$ 396,778.00	\$ 2,245,140.00	\$ 1,250,698.00	\$ 1,174,116.00	\$ 17,911,868.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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3. Name and Address STATE OF OHIO P.O. BOX 1001 COLUMBUS, OH 432161001	4. Program/Project Start Date 07/01/2021		
	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.						
2.						
3.						
4.						
5. TOTAL		\$ 1,055,642.00	\$ 0.00	\$ 16,856,226.00	\$ 0.00	\$ 17,911,868.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 392,767.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 137,469.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 13,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 16,002.00
f. Contract	\$ 10,872,910.00	\$ 1,620,064.00	\$ 172,162.00	\$ 180,000.00	\$ 17,014,392.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 10,872,910.00	\$ 1,620,064.00	\$ 172,162.00	\$ 180,000.00	\$ 17,573,630.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 338,238.00
k. Totals	\$ 10,872,910.00	\$ 1,620,064.00	\$ 172,162.00	\$ 180,000.00	\$ 17,911,868.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Ashtabula County Community Action Agency (Ashtabula)	\$514,509.00 110
Bridges Community Action Partnership (Marysville)	\$544,166.00 117
CAP Commission of the Lancaster-Fairfield County Area (Lancaster)	\$174,692.00 38
CHN Housing Partners (Cleveland)	\$1,533,409.00 329
Clermont County Community Services (Batavia)	\$206,514.00 44
Clinton County Community Action Program, Inc. (Wilmington)	\$309,068.00 66
Community Action Commission of Fayette County (Washington C H)	\$81,856.00 18
Community Action Council of Portage County Inc (Ravenna)	\$491,992.00 106
Community Action Wayne/Medina (Wooster)	\$314,182.00 68
Corporation for Ohio Appalachian Development (Athens)	\$3,090,731.00 664
Great Lakes Community Action Partnership (Fremont)	\$700,150.00 151
Ground Level Solutions, Inc. (Columbus)	\$925,752.00 199
Hancock-Hardin-Wyandot-Putnam CAC, Inc. (Findlay)	\$507,459.00 109
IMPACT Community Action (Columbus)	\$752,978.00 162
LEADS (Newark)	\$202,052.00 43
Mahoning-Youngstown Community Action Partnership (MYCAP) (Youngstown)	\$332,450.00 71
MIAMI VALLEY COMMUNITY ACTION PARTNERSHIP (DAYTON)	\$1,890,965.00 407
Mid-Ohio Regional Planning Commission #140 (Columbus)	\$261,894.00 56
Neighborhood Housing Services of Toledo, Inc (Toledo)	\$595,258.00 128
Northwestern Ohio Community Action Commission (Defiance)	\$471,975.00 100
Ohio Heartland Community Action Commission (Marion)	\$302,218.00 64
People Working Cooperatively (Cincinnati)	\$926,834.00 199
Pickaway County Community Action Organization, Inc. (Circleville)	\$94,109.00 20
Stark County Community Action Agency (Canton)	\$441,428.00 95

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Summit Cty Dept of Planning & Economic Development (Akron)	\$597,751.00 128
Total:	\$16,264,392.00 3,492

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)	<div>3,471</div> 3,471
Rewatherized Units	<div>21</div> 21
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	3,471
C Total Units Reweatherized	21
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	3,492
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	\$10,872,910.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	3,492
H Average Program Operations Costs per Unit (F divided by G)	\$3,113.66
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J Total Average Cost per Dwelling (H plus I)	\$3,113.66

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	3492	29.3	102316
Prior Year Estimate	3646	29.3	106828
Prior Year Actual	1461	29.3	42807

Method used to calculate savings description:

Ohio will use the DOE algorithm to calculate energy savings.

Please note: The HHS LIHEAP funds will be used to leverage DOE funds and weatherize additional units in Ohio. Also note that energy savings projection is reduced slightly based on the decision to offer additional administrative funds to subgrantees, reducing production and therefore, energy savings.

IV.4 DOE-Funded Leveraging Activities

Ohio will not utilize any DOE funds for leveraging activities.

IV.5 Policy Advisory Council Members

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

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American Electric Power (AEP)	Type of organization: Utility Contact Name: Debbie Paris Phone: 3304387106 Email: dlreed@aep.com
Community Action Council of Portage County Inc	Type of organization: Non-profit (not a financial institution) Contact Name: Kim Bond Phone: 3302971456 Email: kbond@cacportage.net
Great Lakes Community Action Partnership	Type of organization: Non-profit (not a financial institution) Contact Name: Terry Jacobs Phone: 4196392802 Email: tjjacobs@wsos.org
Ground Level Solutions, Inc.	Type of organization: Non-profit (not a financial institution) Contact Name: Dave Davenport, Chair Phone: 6148617992 Email: davenportd@groundlevelsolutions.org
Hocking, Athens, Perry Community Action	Type of organization: Local agency Contact Name: Jeremy Boggs Phone: 7407674500 Email: jboggs@hapcap.org
LEADS	Type of organization: Non-profit (not a financial institution) Contact Name: Terry Boehm Phone: 7403454566 Email: tboehm@leadscap.org
MIAMI VALLEY COMMUNITY ACTION PARTNERSHIP	Type of organization: Non-profit (not a financial institution) Contact Name: Barry Strahorn Phone: 9373415000157 Email: Barrs@cap-dayton.org
Ohio Association of CAA Energy Committee	Type of organization: Non-profit (not a financial institution) Contact Name: Andrew (Joe) Devany Phone: 7403871039 Email: joed@ohcac.org
Ohio Department of Aging	Type of organization: Unit of State Government Contact Name: Joe Gage Phone: 7403736400 Email: jgage@buckeyeohio.org
Ohio Mental Health and Addiction Services	Type of organization: Unit of State Government Contact Name: Doug Bailey Phone: 6144669933 Email: doug.bailey@mha.ohio.gov
Ohio Partners for Affordable Energy	Type of organization: Non-profit (not a financial institution) Contact Name: Dave Rinebolt Phone: 6144625496 Email: drinebolt@ohiopartners.org
Ohio Weatherization Training Center	Type of organization: Non-profit (not a financial institution) Contact Name: Kevin McCoy Phone: 7405948499 Email: kmccoy@coadinc.org
PUCO	Type of organization: Unit of State Government Contact Name: Tonja Stewart Phone: (614)466-0138 Email: tonja.stewart@puc.state.oh.us

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

03/22/2021 A virtual public hearing was held on March 22, 2021 seeking input on the draft Home Weatherization Assistance Program State Plan. The transcript is attached, as well as the meeting notice. Notice was sent to the following media outlets: Columbus Dispatch Cleveland Plain Dealer Cincinnati Enquirer Vindicator Printing Athens Messenger Dayton Daily News Portsmouth Daily Times Akron Beacon Journal Marietta Times Toledo Blade Cleveland Call

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& Post Lima News

IV.7 Miscellaneous

- Megan Meadows, Assistant Chief, Community Services Division (CSD), Development, is the Business Officer for the Ohio HWAP State Plan. Megan Meadows will also serve as the grantee Principal Investigator for the Ohio HWAP State Plan. Her contact information is: Megan.Meadows@development.ohio.gov, (614) 728-0961.
- Subgrantees must exercise a buy-local preference to ensure that weatherization materials utilized for the program are produced in Ohio to the greatest extent that cost considerations, product availability, and quantity are warranted. In cases where an out-of-state bid or vendor is preferable, the subgrantee must provide documentation/justification in the file.
- To the greatest extent practicable, subgrantees are encouraged to leverage and coordinate weatherization activities with other housing rehabilitation and/or neighborhood revitalization efforts such as the Housing Assistance Grant Program, Utility Programs, or CHIP.
- To the greatest extent practicable, subgrantees are encouraged to weatherize existing affordable rental housing, especially those accepting rent subsidies, such as Section 8 or Rural Development rental assistance, or an existing Ohio Housing Tax Credit property.
- Subgrantees are encouraged to utilize state-certified Minority Business Enterprises and Encouraging Diversity, Growth and Equity businesses to provide weatherization materials and services to the greatest extent that cost considerations, product availability, and quantity warrant.
- 2019 American Customer Satisfaction Index (ACSI) Survey Action Plan: Development's ACSI score increased by 13 points from the 2017 score. While this improvement in its score is notable, Development is committed to continuing self-assess its programs to provide excellent customer service to the HWAP subgrantees. The areas Development will focus its efforts on include: providing clear communication, providing additional time to review the draft HWAP State Plan, and additional time to prepare the annual HWAP grant application. These action items will be addressed specifically by releasing an update to the network on the statewide production, providing a clear summary with the draft HWAP State Plan as to what changes have been made, and making sure there are ample opportunities for subgrantees to provide feedback on program policies and administration prior to the HWAP State Plan submission to HHS. Development will work to ensure the draft HWAP State Plan is released in a timely manner and the HWAP grant application is released earlier this year so that subgrantees have time to prepare. Also based on feedback received, Additionally, Development will work to better coordinate the HWAP program with other state administered programs, such as CHIP.

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

All dwelling units to be weatherized shall be determined eligible in such a manner to ensure that each weatherized dwelling unit meets the qualifications of Code of Federal Regulations (CFR) 440.22, 'Eligible Dwelling Units', which states that a dwelling unit shall be eligible for weatherization assistance under this part if it is occupied by a family unit:

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

All income eligibility shall be documented by the subgrantee and will be subject to examination by Development, DOE, and the Comptroller General of the United States and/or their designated representatives. Client eligibility may be categorical or traditional, as defined below.

CATEGORICAL ELIGIBILITY

Categorical eligibility applies when one or more persons living in the dwelling unit has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance, or one or more persons in the dwelling unit is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981.

TRADITIONAL ELIGIBILITY

Traditional eligibility applies to any household whose income is at or below 200 percent of the Federal Poverty Level determined in accordance with criteria established by the Director of the Office of Management and Budget, except that the Secretary may establish a higher level if the Secretary, after consulting with the Secretary of Agriculture and the Secretary of HHS, determines that such a higher level is necessary to carry out the purposes of this part and is consistent with the eligibility criteria established for the weatherization program under section 222(a)(12) of the Economic Opportunity Act of 1964; Pub. L. No. 88452, 42 U.S.C. § 2701 et seq. A complete collection of policies and procedures related to eligibility can be found in the Ohio HWAP Policies and Procedures Manual, section D, part 2 customer Eligibility and Application Process.

Describe what household eligibility basis will be used in the Program

A household shall be defined as a family unit meeting the qualifications above in order to qualify for weatherization. In Ohio, any household meeting either Categorical or Traditional Eligibility would be eligible to receive weatherization services from the HWAP.

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

Ohio will follow the policies outlined in "Summary of Immigrant Eligibility Restrictions Under Current Law as of 2/25/2009" in the HHS guidelines, located at <https://aspe.hhs.gov/basic-report/summary-immigrant-eligibility-restrictions-under-current-law> when determining eligibility of qualified and nonqualified aliens. Ohio will not deny access to any state or local benefits to any qualified alien that meets the definition of excepted services.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Before a client can be served by HWAP, the subgrantee must:

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- Complete the HWAP application in Ohio Community and Energy Assistance Network (OCEAN).
- Verify and document income eligibility, occupancy (owner, renter, other agreement with owner), and notify the client of eligibility or ineligibility within 60 days of processing a completed application. Subgrantees are required to maintain records that include documentation of client eligibility
- For single-family units, subgrantees are required to provide proof of ownership in each client file prior to commencing work. This includes manufactured homes. Most subgrantees are able to access documentation on county auditor's websites, including information on potential foreclosures. Single-family units for sale or in foreclosure are not eligible for weatherization.
- Determine client's priority status.
- No dwelling unit will be weatherized without documentation that it is an eligible dwelling unit, as defined as 10 CFR 440.22.
- Subgrantees maintain records of previously weatherized dwelling units, as does Development. The database is checked prior to scheduling a household for service, to ensure that the dwelling unit has not been previously weatherized.
- If the house has been previously weatherized and is not eligible for reweatherization, as defined in 10 CFR 440.18, the dwelling unit will not be weatherized. If the house is eligible for reweatherization, the subgrantee will make the determination whether or not to reweatherize the house based on a number of factors including the energy usage of the house and the number of eligible households on the waiting list. Dwelling units weatherized may not receive reweatherization services until 15 years after the date of final inspection.
- All household files must contain the required documentation to show eligibility including approved client applications, landlord agreements (if applicable), etc.

Appeals Procedures

Clients have 30 days from the date they receive their application notification to appeal decisions made regarding their HWAP application. Clients must be informed of this right when they receive their application and again in their notification letter.

Clients may also appeal if their application is not decided upon in 60 days. Clients must be informed of this right at the time an application is submitted.

Grounds for appeal are:

- HWAP application was denied.
- If the application was neither approved nor denied within 60 days after the application was submitted,

unless such delay was the result of the client's lack of cooperation in providing necessary documentation to determine eligibility.

The above procedure must be prominently posted by the subgrantee in a common area accessible to all clients that apply for HWAP services.

Describe Reweatherization compliance

Ohio has adopted the "rolling" reweatherization option of Section 1011 (h) of the Energy Act of 2020. Dwelling units weatherized (including partially weatherized units) with DOE funds, or under other Federal programs, may not receive further financial assistance for weatherization until 15 years from the date of the final inspection. The inclusion of "other Federal programs" includes all Federal funds including LIHEAP, HUD, or USDA weatherization activities.

The priority is to serve dwelling units that have not received prior services. All dwelling units completed must have an energy audit performed to cost justify any additional measures being installed. Subgrantees track weatherized structures to determine if the dwelling unit was previously weatherized. Also, Development uses OCEAN for tracking dwelling unit completions to verify that a dwelling unit has not been previously weatherized.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single-family, manufactured housing, and multifamily housing. All structures must be stationary and have a specific mailing (street) address. Campers and nonstationary trailers are not eligible for weatherization services. No weatherization may occur for vacant single-family homes.

Residences operating primarily as a business may not be weatherized.

Ohio has an agreement with the State Historic Preservation Office regarding weatherization services on dwelling units 50 years and older. A Program Comment was issued by the Advisory Council on Historic Preservation on March 11, 2013 pursuant to 36 CFR 800.14(e), published in the Federal Register on March 14, 2013, and extends the duration of the existing 44 Programmatic Agreements, and any future agreements that may be executed under the prototype Programmatic Agreement, until December 31, 2020. This included Ohio's agreement with our State Historic Preservation Office. Weatherization measures are largely exempt from prior approval as defined in the agreement. A link to the agreement, which is now extended to December 31, 2030, is attached below:
<https://www.energy.gov/eere/wipo/downloads/ohio-state-historic-preservation-programmatic-agreement>

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Describe how Rental Units/Multifamily Buildings will be addressed

Rental units are eligible for weatherization and represent a significant portion of the dwelling units weatherized in Ohio. Landlord contributions for eligible single-family and manufactured housing rental dwellings shall not be required per 10 CFR 440.22(d) and the Final Rule amending the DOE Weatherization Assistance Program regulations dated March 4, 1993, (58 FR 12514). Subgrantees may encourage landlord financial participation, but eligible single-family and manufactured housing dwellings may not be deferred for service if the landlord does not consent to a financial contribution. Ohio waives the contribution for carbon monoxide and smoke alarms for all rental units.

Written permission of the building owner or authorized agent is required prior to commencing work. For one-year post weatherization (one year after the final inspection date) the owner must agree not to raise the rent as a result of the weatherization performed on the rental unit. In the case of a rent increase, tenants are made aware of their right to appeal in Ohio's Landlord/Tenant agreement, which must be signed by both parties (owner and tenant) prior to commencing work.

In the situation where the eligible household's utilities are included in the rent payment, low-income accrual will be determined and documented by the subgrantee and contained in the client file. Measures related to Health and Safety (H&S) and energy education received by the occupant will contribute towards low-income accrual. In this instance, landlord financial participation will be encouraged but not required. Undue or excessive enhancement of any dwelling unit, including rental units, is prohibited. Ohio does not support the placement of liens on properties related to weatherization for any reason.

SINGLE-FAMILY UNITS

For single-family units, subgrantees are required to provide proof of ownership in each client file prior to commencing work. This includes manufactured homes. Most subgrantees are able to access documentation on county auditor's websites, including information on potential foreclosures. Single-family units for sale or in foreclosure are not eligible for weatherization.

MULTIFAMILY UNITS

Ohio requires prior approval for multifamily buildings of five or more units. An Energy Audit using the Queens Information Package (EAQUIP), or equivalent DOE approved audit program, review of the audit and an onsite visit by a state technical monitor is also required. The audit must be approved by DOE prior to the materials being installed. Funds are not set aside for multifamily projects in Ohio. Leveraged funds and projects with contributions from landlords are prioritized, as well as projects that propose significant energy improvements and positive impact on communities. In the case where the landlord can sufficiently document program eligibility or provide additional information to demonstrate that contribution is not feasible, the contribution requirement may be waived by the subgrantee/Development staff. The building eligibility guidelines in the HWAP Policies and Procedures Manual for Ohio state that prior to initiating work, the building must have at least 66 percent of units occupied by eligible clients (50 percent for two and four-unit properties), a valid energy audit (as prescribed in section V.5.2), owner contribution (when applicable), quotes for all work exceeding \$10,000 and any other pertinent information requested by the monitor. When these conditions are met, the building may be approved for weatherization and work may commence.

GROUP HOMES AND SHELTERS

The eligibility for group homes and shelters is specified in the "Definitions" section of 10 CFR 440 regulations. Shelters for the homeless, battered spouses, etc., may be weatherized. Subgrantees may count each 800 square feet as a unit or each floor of the shelter as a unit. Applications for HWAP services from group homes must list all persons living in the home and their incomes (if age 18 and older or an emancipated minor). Applications for shelters are permitted to list only the shelter name. Individual names of persons within the shelter and/or incomes are not required. Prior approval by Development is required to weatherize a shelter or a group home.

Describe the deferral Process

Conditions that prevent the weatherization of the dwelling unit may lead to a deferral. Deferral is recommended if conditions exist that prevent safe, effective, and/or meaningful weatherization. Conditions preventing weatherization include, but are not limited to, the following:

- Standing water, mold, or other moisture issues that cannot be addressed with weatherization funding.
- Electrical or plumbing hazards or structural failures that cannot be addressed as a part of weatherization services.
- Friable asbestos or other asbestos issues that cannot be addressed with weatherization funding.
- Deteriorated lead-based paint (LBP) surfaces or when the extent and/or condition of LBP may create other H&S hazards.
- Evidence of large spread infestations of rodents, insects, and/or other vermin.
- Unsecured pets.
- Sewage or animal feces in the home.
- Improperly stored chemicals, combustible materials, or other fire hazards.
- Maintenance/housekeeping practices that limit access to the dwelling or create an unhealthy work environment.
- Major remodeling is in progress, which limits the proper completion of weatherization measures.
- Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.

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- The illegal presence or use of any controlled substance in the home during the weatherization process.
- Occupant has self-declared health conditions that prohibit the installation of weatherization materials.
- Preexisting compliance issues.
- The area is slated for redevelopment.
- The area is in a high-risk geographic area (e.g. a flood plain).
- Refusal by the client to remove certain space heaters, or other unsafe items.
- The dwelling unit is in foreclosure or for sale.
- Other issues, as defined by the qualified inspector and approved by the subgrantee's Energy Coordinator.

When possible, subgrantees are encouraged to make referrals or collaborate with other programs including utility sponsored weatherization programs, Healthy Homes programs, home repair programs, and other local resources, in order to best serve the client. Ideally, some of these services are provided by the same subgrantee installing the weatherization measures. However, it is the client's responsibility to correct the condition(s) causing the deferral in order for weatherization services to proceed. When the conditions causing the deferral have been addressed, clients are asked to contact the subgrantee to reevaluate the home. These clients are then given top priority to receive services and are not placed back on the wait list. Documentation regarding the reason for deferral is required in the client file, and subgrantees are encouraged to collaborate with their state technical monitor to make decisions regarding deferral. Please see attached template for tracking deferral/referrals.

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.

Assistance to low-income tribe members and other low-income persons is equal.

V.2 Selection of Areas to Be Served

All 88 counties will be served in Ohio.

Ohio completes an annual Risk Assessment of subgrantees to evaluate performance and to determine if a subgrantee is administering an effective weatherization program. The Risk Assessment tool evaluates subgrantees based on administrative, technical, and fiscal management. A rating of "high risk" for two consecutive years on the annual Risk Assessment performed by Development, may result in a competitive proposal process for the subgrantee's territory after the current contract expires. Should the Risk Assessment rating result in a competitive proposal process for any subgrantee's territory, Ohio will proceed in accordance with 10 CFR 440.15.

V.3 Priorities

The following applicants are prioritized as required by 10 CFR 440.16 "Minimum Program Requirements":

- Elderly person(s)
- Disabled person(s)
- Dependent child(ren) in the home
- High energy burden households
- High energy user households

Appropriate documentation is required in the client file to substantiate the assigned priority for service delivery.

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Weatherization funds are to be used to equitably serve all eligible clients with priority for service delivery to households meeting the conditions of 10 CFR 440.16. High energy burden/users are defined as a household at or below 175 percent of the Federal Poverty Level at the time of application. These households tend to expend more of their income on utility costs than the median for low-income users.

Ohio will utilize the current electronic data entry system (OCEAN) to track households identified as "High Energy Users" and as having a "High Energy Burden". This data will be reported in the DOE quarterly reports.

Clients meeting one or more of the priorities for service delivery as described above, will be considered "Priority Applicants". Clients that apply for HWAP services and do not meet one or more of the priorities for service delivery, will be considered "Traditional Applicants". All clients will be placed on the subgrantee waiting list for the applicable county in which they reside. Priority Applicants will be placed on the waiting list ahead of Traditional Applicants and ordered by eligibility date (oldest to newest). Under no circumstances shall a Traditional Applicant be served before a Priority Applicant. All applicants are required to re-verify the household income for the program annually. No applications on the waiting list should be older than one (1) year.

Each subgrantee is assigned a specific minimum number of units to complete per county, per program year, based on funds allocated. The first 25 percent (rounded up) of those planned units for that county, will be selected for service from the wait list based on earliest eligibility date (ordered from oldest to newest). After the first 25 percent of eligible applicant units have been designated, the remaining number of units will be selected for service from the wait list. The first 25 percent of eligible applicants must be served during the current program year. Subgrantees are encouraged to maximize the use of HWAP funds to coordinate with other federal, state, local, or privately funded programs in order to improve energy efficiency.

Development has a priority for service delivery waiver form available for subgrantee use. This form may be submitted to Development for acceptance and use that is not contrary to the rules set forth by DOE and the 10 CFR 440.16 "Minimum Program Requirements". A copy of this form is attached. Emergencies may take precedence over all other priorities. Emergencies are defined as life-threatening housing conditions. The HWAP Priority Waiver Request Form must be completed and approved by a state monitor prior to work commencing, and the HWAP Priority Waiver Request Form must be kept in the client file.

V.4 Climatic Conditions

The climate of Ohio is a humid continental climate (Köppen climate classification Dfa) throughout most of the state, except in the extreme southern counties of Ohio's Bluegrass Region, which are located on the northern periphery of the humid subtropical climate and Upland South region of the United States. Summers are typically hot and humid throughout the state, while winters generally range from cool to cold. Precipitation in Ohio is moderate year-round.

Severe weather is not uncommon in the state, although there are typically fewer tornado reports in Ohio than in states located in what is known as "Tornado Alley". Lake effect snowstorms also are not uncommon on the southeast shore of Lake Erie, which is located in an area designated as "the Snowbelt" (source: Ohio Department of Natural Resources). The highest recorded temperature was 113 °F (45 °C), near Gallipolis on July 21, 1934. [31] The lowest recorded temperature was -39 °F (-39 °C), at Milligan on February 10, 1899. [32] (source: The National Climate Data Center). Ohio subgrantees use the following weather stations when completing energy audits: (Source: "Comparative Climatic Data", National Climatic Data Center, NOAA, 2001.)

Akron, Ohio: 6148 HDD + 679 CDD = 6827 Total DD

Cincinnati, Ohio: 5200 HDD + 1053 CDD = 6253 Total DD

Cleveland, Ohio: 6097 HDD + 712 CDD = 6809 Total DD

Columbus, Ohio: 5546 HDD + 925 CDD = 6471 Total DD

Dayton, Ohio: 5678 HDD + 935 CDD = 6613 Total DD

Toledo, Ohio: 6488 HDD + 715 CDD = 7203 Total DD

Youngstown, Ohio: 6446 HDD + 561 CDD = 7007 Total DD

Fort Wayne, Indiana: 6198 HDD + 830 CDD = 7028 Total DD.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

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All Ohio weatherization work will be performed in accordance with U.S. Department of Energy (DOE)-approved procedures and materials listed in 10 CFR 440 Appendix A. Additionally, DOE has approved the use of the following materials not indicated in Appendix A of 10 CFR 440:

- Light Emitting Diode (LED) bulbs, approved 11/27/18
- Spray foam as an insulation material, approved 11/27/18
- Energy Star Refrigerators, approved 11/20/19
- Extended measure lifetimes, approved 11/20/19

Ohio subgrantees must perform all work according to the National Renewable Energy Laboratory (NREL) Standard Work Specifications (SWS), and the State of Ohio Weatherization Field Guide for Home Energy Updates to acceptable standards of service delivery for the Ohio weatherization network.

The subgrantee's signature on the HWAP grant agreement documents will serve as verification that work will be performed in accordance with NREL SWS specifications of work quality outlined in WPN 15-4, Section 2.

The following is an excerpt from the subgrantee agreement:

"Grantee hereby acknowledges and represents that it has current, complete, and up to date copies of the following rules, regulations, and guidelines:

- 10 CFR Part 440, U.S. Department of Energy Weatherization Assistance for Low-Income Persons
- 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- The Home Weatherization Assistance Program State Plan for the current program year
- The Ohio Home Weatherization Assistance Program Policies and Procedures Manual
- All applicable Information Updates issued by Grantor
- The State of Ohio Weatherization Field Guide for Home Energy Updates

The State of Ohio Weatherization Field Guide for Home Energy Updates was completed by Development staff in conjunction with Saturn Resource Management and went into effect March 2019. The document was issued to all subgrantees and contractors. An electronic version of the field guide is also available online at <http://wxfieldguide.com/oh/#t=OHWxFg%2FTitle%2FTitle.htm>.

WEATHERIZATION PROGRAM STANDARDS

Weatherization Program Standards shall be determined in accordance with the State of Ohio Weatherization Field Guide for Home Energy Updates and NREL SWS in effect at the time. If a subgrantee subcontracts any portion of the HWAP in accordance with Section 17 of the subgrantee Agreement, the subgrantee has the additional responsibility to ensure that all programmatic information including T&T/A is received by the subcontractor and that the subcontractor is in compliance with all applicable program requirements, including but not limited to adherence to the NREL SWS and the State of Ohio Weatherization Field Guide for Home Energy Updates.

Field guide types approval dates

Single-Family: 12/10/2018
Manufactured Housing: 12/10/2018
Multi-Family: 12/10/2018

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: NEAT
Approval Date: 7/10/2018

Audit Procedure: Manufactured Housing
Audit Name: MHEA
Approval Date: 6/13/2019

Audit Procedure: Multi-Family
Audit Name: Other (specify)
Other funding sources are used to weatherize multifamily buildings. Development does not plan to seek DOE approval of audit protocol for this

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housing type.

Approval Date:

Comments

SINGLE FAMILY HOUSING

Ohio models all 1-4 unit buildings with NEAT (version 8.9). Each energy conservation measure must have an SIR of 1 or greater and the cumulative job SIR must be 1 or greater. Subgrantees are required to follow the policies and procedures in Ohio's HWAP program manual and the State of Ohio Weatherization Field Guide for Home Energy Updates.

MANUFACTURED HOUSING

Development models all manufactured housing with MHEA (version 8.9). Each energy conservation measure must have an SIR of 1 or greater and the cumulative job SIR must be 1 or greater. Subgrantees are required to follow the policies and procedures in Ohio's HWAP program manual and the State of Ohio Weatherization Field Guide for Home Energy Updates.

MULTIFAMILY

Subgrantees use other funding sources (traditionally LIHEAP) to weatherize multi-family (5-25+ units) and Development does not plan to seek DOE approval of an audit protocol for this housing type. If DOE funds would be proposed for weatherizing multi-family buildings in the future, those buildings' energy audit and supporting documentation will be submitted to DOE for approval on a case-by-case basis. The EA-QUIP or equivalent DOE approved audit program is currently approved for use in multifamily buildings.

Please see attachment for Development's transition plan to web based software v10 of NEAT and MHEA.

V.5.3 Final Inspection

As specified in 10 CFR 440.16(g), no dwelling unit will be reported to Development as completed until a Quality Control Inspector (QCI) has performed a final inspection and certified that applicable work has been completed in compliance with the NREL SWS, the State of Ohio Weatherization Field Guide for Home Energy Updates, and as determined by a DOE approved energy audit. In addition, to ensure a separation of duties, the Energy Auditor and QCI must be different individuals (independent QCI method). Under no circumstances is the QCI permitted to inspect their own work (e.g. install or help install the furnace and then complete the final inspection on the work performed).

Process to Ensure Adequate Quality Control Inspection

All final inspections must be conducted by a Building Performance Institute (BPI) Certified QCI. Currently, a total of 137 individuals in Ohio have earned the QCI credential to serve 25 subgrantees in 88 counties. Subgrantees may employ or contract for these services. Prior approval by Development is required for all contracted services. Subgrantees request approval by submitting appropriate documentation to Development, generally within the HWAP grant application. Approvals also may be granted throughout the program year when necessary. A master list of all contractors approved to work in weatherization is maintained by Development staff. Final inspection documentation and certification will be placed in the client's file. If monitored by Development staff, the file will contain signatures of the subgrantee QCI and state technical monitor QCI.

Relevant Policies and Procedures: Every dwelling unit reported as a "completed unit" must receive a final inspection ensuring that all work meets the minimum specifications outlined in the NREL SWS and the techniques described in the State of Ohio Weatherization Field Guide for Home Energy Updates and in accordance with 10 CFR 440.

Dwelling units must be inspected using criteria found in the specifications outlined in the Work Quality section of WPN 15-4.

Every client file must include documentation that certifies that the dwelling unit had a final inspection and that all work met the required standards. The inspection must be performed, and the Final Certification form signed by the QCI and the eligible client. The Final Certification form must be placed in the client file and uploaded to OCEAN along with Building Weatherization Reports (BWRs). Dwelling units without a valid final inspection will not be counted in production and could result in disallowed costs.

The QCI must include an assessment of the original audit, complete the Weatherization Audit Review Checklist, and confirm that the measures called for on the work order were appropriate and in accordance with the grantee audit procedures and protocols approved by DOE. Additionally, the following language is

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required on all final certification forms:

"I certify that the work completed on job number _____ meets all requirements of the NREL Standard Work Specifications and installation procedures as described in the State of Ohio Weatherization Field Guide for Home Energy Updates. I grant the Ohio Development Services Agency (Development) and its designees permission to use information associated with this job for the purpose of conducting weatherization studies or statistical analyses. I understand that no information obtained for job number _____ shall be made public in such manner that the dwelling or its occupants may be identified, except with written consent by the occupant."

STANDARDS AND TECHNIQUES FOR WEATHERIZATION:

Standards and Techniques for weatherization shall be determined in accordance with 10 CFR Part 440.21; the applicable provisions of the HWAP State Plan; and the rules and regulations promulgated pursuant thereto.

If a subgrantee subcontracts any portion of the HWAP in accordance with Section 17 of the subgrantee Agreement, the subgrantee has the additional responsibility to ensure that all programmatic information including T&T/A is received by the subcontractor and that the subcontractor is in compliance with all applicable program requirements, including but not limited to adherence to the NREL SWS and State of Ohio Weatherization Field Guide for Home Energy Updates.

The OWTC offers a three-day preparatory course in addition to standard inspector coursework in an effort to prepare students for the Energy Auditor certification test, which includes both a hands-on field test component and standardized test component. Ohio allows DOE T&T/A funds to be used up to six times per person, to take or retake any portion of the Energy Auditor exam and the QCI exam.

Final inspections are required to be signed by the eligible client. In the event the client refuses, subgrantees should contact their Development technical monitor for guidance. If the client allows Development's technical monitor to perform an inspection and the work is certified by a Development staff person with the QCI credential, the requirement for client signature may be waived in writing by Development staff, and the dwelling unit may be reported as a completed unit.

Inspection Forms

The Quality Control Inspection form (attached) is the state monitoring inspection form, based on the tool provided by DOE, and the final inspection certification form. This form is placed in the client's file and serves as a recording of all Quality Control Inspections performed on the dwelling unit(s).

Consequences for Failure to Provide a QCI

In the event a subgrantee submits a unit(s) without a certified Quality Control Inspection form or the QCI does not perform an adequate inspection, Development will take appropriate action. This may include additional training requirements, failing the unit(s), increased monitoring and/or disallowed costs for the unit(s). Consequences for failure of a QCI to inspect to the most recent approved NREL SWS and State of Ohio Weatherization Field Guide for Home Energy Updates, and other applicable codes:

- 1st violation will result in verbal warning, T&T/A with state certified QCI monitor, and subgrantee may be required to perform another Quality Control Inspection and/or additional work to bring the work up to the NREL SWS standards.
- 2nd violation will result in a written warning, T&T/A with state certified QCI monitor, and the subgrantee may be required to perform another Quality Control Inspection and/or additional work to bring the work up to the NREL SWS standards. The subgrantee and inspector must submit an action plan describing how they will ensure adequate inspections will be conducted in the future.
- 3rd violation may result in disallowed costs for subgrantee. A second written warning and the suspension of privileges to conduct Quality Control Inspections until additional training is completed and a state certified QCI monitor has conducted additional T&T/A and is satisfied the inspector can complete thorough and adequate inspections.
- 4th violation may result in the QCI being referred to BPI for revocation of certification and the cost of completed units inspected by the QCI in question may result in disallowed costs until the work is certified by an independent QCI.

V.6 Weatherization Analysis of Effectiveness

According to the Home Energy Affordability Gap Study 2018 (2nd series) published in April 2019, Ohio households with incomes below 50 percent of the Federal Poverty Level pay 27 percent of their annual income for their home energy bills. According to the most recent five-year American Community Survey, the number of Ohioans whose income is below 50 percent is nearly 338,000. More than 391,000 additional Ohio households live with incomes between 50 percent and 100 percent of the Federal Poverty Level and face a home energy burden of 15 percent. Bills for households with incomes between 150 percent and 185 percent of the Federal Poverty Level take up 7 percent of income. Ohio households with incomes between 185 percent and 200 percent of the Federal Poverty Level have energy bills equal to 6 percent of income. In 2018, the total number of Ohio households below 200 percent of the Federal Poverty Level fell slightly from the prior year.

Assessment of Effectiveness of Subgrantees

Ohio uses a variety of methods to assess the effectiveness of subgrantees. Monitoring, both technical and administrative/fiscal, is performed as indicated in

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section V.8.3. Ohio may require T&T/A and/or more frequent monitoring when necessary.

Additionally, Ohio has developed a Risk Assessment tool to evaluate each subgrantee's effectiveness in key areas, including financial audit and fiscal procedures, technical performance, and administrative performance. Items reviewed include single subgrantee audit findings, ability to meet production goals and other performance measures, expenditures, average cost per unit, ability to meet deadlines and monthly reporting requirements, H&S performance, staff qualifications and experience, procurement policies and procedures, and contractor/crew management. Subgrantees are identified as high risk, moderate risk, or low risk based on the results identified in the tool. All subgrantees will be assessed for risk annually following the program year of review. Results are shared with each subgrantee, and Development audit staff as a tool to develop subgrantee capacity and direct appropriate T&T/A. This tool also is used to compare performance between subgrantees.

During Program Year 2020, Ohio will seek feedback from subgrantees on the specific questions asked within the Risk Assessment tool. Ohio will utilize that feedback to update the Risk Assessment Tool to be used during Program Year 2021.

How are the comparisons used to develop training opportunities/priorities?

High risk subgrantees must submit a Corrective Action Plan to address the results of the Risk Assessment tool. Development's administrative monitors also follow up on results of the Risk Assessment and the subgrantees' plans for improvement at scheduled visits. T&T/A visits may be required by Development or requested by the subgrantee to support those with performance issues. Subgrantees identified as high risk are placed in a Continuous Improvement Plan (CIP) until the next annual risk assessment is performed. Additionally, a designation of high risk for two consecutive years may result in the competitive rebidding of the service territory.

Incorporating Monitoring Feedback

Monitoring feedback is continuously incorporated into program procedures. Previous monitoring requirements or recommendations are noted in current monitoring reports, as are repeated required or recommended actions. Aggregate data on subgrantee performance is analyzed and used to provide T&T/A. Technical monitoring reports are copied to the OWTC, which tracks findings and uses the information to guide T&T/A efforts. OCEAN, Development's online database, also tracks the results of technical monitoring. Reports are available that summarize findings by subgrantee or for the entire network, breaking down findings by type. These reports also can be used to direct future monitoring and T&T/A.

Path of Continuous Improvement/Continuous Improvement Plans

When a subgrantee fails a technical monitoring visit (less than 60 percent of units monitored do not pass the QCI by Development staff), the subgrantee will be placed in a CIP. Frequency of subgrantee monitoring is increased, and technical assistance or training may be required.

When program management or fiscal findings are cited on an administrative monitoring visit, the subgrantee is given 30 days to respond. Failure to respond will result in noncompliance with sections 10 and 11 of the HWAP grant agreement and could result in disciplinary action. Training on administrative and fiscal policies is delivered by Development audit staff at conferences, meetings, webinars, all provider trainings, and other venues as needed.

Tracking Subgrantee Performance Reviews

High level information resulting from subgrantee performance reviews is tracked in an electronic data base. Tracked data includes subgrantee name, date of visit, number and percentage of units monitored, and response due date. More detailed information on technical findings, required actions, and pass/fail rate of units monitored is tracked in OCEAN. Statistics regarding subgrantee performance such as production numbers and air leakage reductions are collected on BWRs and tracked in OCEAN. Reports are reviewed for progress toward production goals, expenditures, anomalies and/or other questions and concerns, and may be referred back to subgrantees for explanation or corrections, or to the technical/administrative monitors for follow up, when applicable.

Monitoring Process for Improvement

Monitoring is formal, and scheduled in Ohio, for both programmatic and fiscal compliance. A monitoring report is sent to each subgrantee detailing all findings. All findings, except for H&S findings, must be resolved within 30 days. Ohio uses a H&S Notification Form and requires that any findings related to H&S must be resolved as soon as possible, no later than three (3) working days. The response is then reviewed and accepted via letter to the subgrantee. All findings become part of the Risk Assessment review for the subgrantee. More information on the monitoring process can be found in section V.8.3.

Costing of Measures

To ensure measures are being accurately priced, Ohio requires that subgrantees use an approved price list (required submission with grant application for approval) or obtain three bids for work completed by contractors. All vehicles and equipment with an acquisition cost of \$5,000 or more require prior approval from Development and non-DOE funds must be used. Ohio crew-based programs purchase inventory up front and are reimbursed by the grant upon installation of the materials. No grant owned inventory is permitted.

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V.7 Health and Safety

Development's Health and Safety Plan is included in PAGE as an Attachment.

V.8 Program Management

V.8.1 Overview and Organization

Grantee Organization

The weatherization program is administered by the Development, CSD, OCA. The OCA also administers the federal LIHEAP, the Community Services Block Grant, and the State Energy Plan.

OCA also administers the state funded Percentage of Income Payment Plan Plus, and the Electric Partnership Program.

The HWAP is directly administered by the Manager, Energy Efficiency Programs, OCA. An additional seven staff positions are dedicated to monitoring and compliance. Development has 25 direct contracts with subgrantees (Community Action Agencies (CAAs) (18) ; local government agencies (2); and nonprofit, non-CAA agencies (5)) to implement the HWAP. These subgrantees will ensure that HWAP services are available in all 88 of Ohio's counties. Subgrantees are solely responsible for the quality of work and reporting requirements of the HWAP. Subgrantees are expected to monitor the performance of contractors, crews, and nonprofit partners carrying out work for the HWAP. Additionally, Development monitors will visit all subgrantees and review no less than five (5) percent of completed units (see V.8.3 Monitoring Activities for additional details).

Traditionally, 15 percent of LIHEAP funds for Ohio are transferred annually to the HWAP. These funds follow the same rules of the DOE weatherization program, with a few exceptions based on program funding needs. The flexibility provided by these funds prevents many deferrals for Ohio clients and is vital to the continuation of a successful program. In Program Years 2018 and 2019 the LIHEAP program transferred a total of 20 percent of funds for weatherization. Fifteen percent of funds were combined with the HWAP grant agreement, and the remaining 5 percent was allocated to HWAP subgrantees as a separate grant agreement. Beginning in Program Year 2021, Development will seek a waiver request from HHS to allow 25 percent of the state's LIHEAP funds to be utilized towards the weatherization program. The additional 5 percent, and then anticipated 10 percent in Program Year 2021, are used by HWAP subgrantees to offset costs of the HWAP and provide funding for H&S related measures such as knob and tube wire replacement, minor roof repair and ventilation measures. This is to achieve the ultimate goal of reducing the number of deferrals in Ohio.

Relationship of the Weatherization office with other units of State Government

The Deputy Chief of the OCA reports to the Assistant Chief of the CSD, who also oversees the Deputy Chief of the Office of Community Development (OCD). The OCD includes among its programs housing repair programs such as CHIP and the Housing Assistance Grant Program.

V.8.2 Administrative Expenditure Limits

Development will follow the rules for administrative expenditure limits outlined in 10 CFR 440.18(e), which state that not more than 15 percent of any grant made to a state may be used by the grantee and subgrantees for administrative purposes in carrying out duties under this part, except that not more than 7.5 percent may be used by the State for such purposes, and not less than 7.5 percent must be made available to subgrantees by states. Ohio tracks administrative expenditures on the monthly financial reimbursement request. Also, Ohio's grants management and database software, OCEAN, prevents budgeting greater than the maximum allowable in the administration category for subgrantees.

For subgrantees, "administrative costs" shall be defined as those costs which a subgrantee incurs that are not in direct support of individual weatherization projects but are necessary for the organization to operate the HWAP. Typical expenditures found in this category are wages, fringe benefits and related costs associated with the following functions: executive (not directly installing or supervising the installation of materials), finance/accounting, human resources, and planning. Other typical administration cost category expenditures are payroll processing costs, costs to administer health insurance programs, data processing

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costs, indirect costs as allowable, and bank service fees. Membership dues are considered administrative costs and not more than 25 percent of the cost of any membership may be charged to HWAP.

“Indirect costs” will be an allowable expenditure only when written approval of the indirect cost rate has been obtained by the subgrantee from the subgrantee’s cognizant federal agency. Indirect costs are considered Administrative costs. Audit and liability insurance costs may be prorated and included in separate respective cost categories only when not included in the indirect cost rate agreement.

V.8.3 Monitoring Activities

Monitoring Activities

Staff Dedicated to Monitoring

Development employs six (6) monitoring staff persons (salaries paid by DOE T&T/A and HHS/LIHEAP funds – see budget justification for details). Ohio has allocated 35 percent of DOE T&T/A funds to support monitoring activities.

- Energy Developer (Lead Technical Monitor QCI)
- Energy Analysts 2 (Technical Monitors QCI)
- Community Development Analysts (Administrative Monitors)

Summary Programmatic and Fiscal Monitoring

Development has an established monitoring system for evaluating subgrantee performance regardless of funding source. Monitoring functions will be the State’s principal method for determining subgrantee compliance, evaluating actual accomplishments against planned activities, and determining the effectiveness of the program. Salaries for state monitors and the program manager are charged to the DOE T&T/A category.

Monitoring provides objective reporting to and from subgrantees and makes recommendations to address program and administrative deficiencies and needs. The administrative field staff will review fiscal procedures, staffing and organization, procurement, and client services. The technical field staff will review property management, training records, inventory, materials quality, and field work. Each subgrantee will be visited by a technical field representative at least once per monitoring year to review no less than 5 percent of completed units. Each subgrantee will be visited by an administrative field representative at least once every monitoring year to review no less than five (5) percent of the completed unit files. Program Year is defined as July 1 through June 30.

Monitoring visits are generally arranged with subgrantees at least two (2) weeks in advance. Subgrantees are not permitted to choose the units for monitoring. Units are chosen by state monitoring staff, based on noted anomalies or risk factors identified in previous onsite monitoring or desk monitoring, housing types, measures installed, and location. No specific monitoring schedule is set for Program Year 2021 at this time. In general, monitors visit one (1) to four (4) subgrantees per month to perform monitoring and/or T&T/A. There are currently 25 subgrantees in Ohio. Additionally, if the pandemic situation continues, Development will modify monitoring activities to be done remotely. This will be done using a combination of secure file upload process, virtual home visits and review of pictures of measures installed.

A job automatically fails the visit if the client confirms the subgrantee came to monitor the unit itself in an effort to “clean up” the job prior to the state monitoring visit.

To ensure a separation of duties, the Energy Auditor and QCI must be different individuals (independent QCI method). If a subgrantee does not have a QCI or an adequate number of QCIs, they may contract for these services.

Ohio only employs the independent QCI method. The Energy Auditor and the QCI are listed on the Building Weatherization Report. Additionally, the QCI must complete and sign the Final Certification Form which is uploaded into OCEAN with the BWR for review.

Travel is necessary to complete the demands of the monitoring approach, and federal travel rules are followed by the State of Ohio. State owned vehicles are generally used for in-state travel unless not available or not cost effective. All technical monitors performing Quality Control Inspections are required to maintain the BPI QCI credential.

Corrective Actions Procedures

Ohio’s monitoring approach will include the following components:

- Administrative review by field staff of documents and reports related to the organization, operation and performance of local subgrantees’ programs
- Monitoring for technical compliance with standards, performance measures, applicable codes, and other policies related to installation of materials; and

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- Fiscal Audit of financial stability and accountability.

Administrative Monitoring

The administrative review covers the following, at a minimum: financial management systems and operations, review of previous monitoring visits, payroll/personnel, procurement procedures, subgrantee or partner agency monitoring, invoicing/purchase orders compared to work orders and price list or bids, records retention, contractor compliance, client file review, program structure, marketing, general program operations and flow of services, review of production goals, information technology needs assessment, and gathering of success stories. Reports are sent to the subgrantee Board Chairperson and Executive Director, who must respond within 30 days of receipt of the report and provide evidence or assurance, as appropriate, of all actions taken. A 15-day extension for the response is allowable with permission from the Manager of the Energy Efficiency Programs within Development.

The administrative monitoring also includes review of annual grant applications, reports based on monthly financial and production information, and compliance with required written procedures. Problems noted through this review are communicated to the subgrantees for their subsequent explanation and/or resolution. Client files have been standardized in Ohio since 2010. Administrative monitors also check for adherence to both existing and new policies and procedures, and provide training upon request or requirement when subgrantees fail to meet expectations in one or more area. The Administrative Monitoring Quality Assurance Checklist for file review is attached, along with a copy of the monitoring instrument.

Technical Monitoring

Technical monitoring reports are completed within 30 days of the visit to the subgrantee. These reports will summarize the findings and, when necessary, direct the subgrantee to take specific actions to correct issues of noncompliance and/or to develop a plan of action to improve performance. Reports are sent to the subgrantee Board Chairperson and Executive Director who must respond within 30 days of receipt of the report and provide evidence or assurance, as appropriate, of all actions taken. A 15-day extension for the response is allowable with permission from the Manager, Energy Efficiency Programs, of Development. Monitoring reports include a reminder that suspension of funding is possible if a subgrantee fails to respond within the allowable timeframe. Technical monitoring also includes review of annual grant applications, analysis of tools/equipment inventories, and compliance with required written procedures.

Development has developed and implemented procedures to ensure state monitoring is increased if a subgrantee's pass rate for all monitored units on a single visit falls below the established acceptable pass rate of 60 percent. Based on the monitoring reports, any subgrantee falling below the visit pass rate of 60 percent any time during the program year will receive additional technical monitoring of its completed units for the next two (2) consecutive quarters. A minimum of three (3) completed units will be monitored during each of these follow up visits. During the period in which the subgrantee pass rate is below 60 percent, Development will work with that subgrantee with T&T/A and/or the OWTC to address the problematic areas causing the low passage rate. Under this process, units pass or fail based on specific parameters. Units monitored that have one or more H&S findings (any H&S finding is considered a major finding) or a combination of four or more minor or moderate findings, fail the job. More than 60 percent of units monitored at an onsite visit must pass. Subgrantees who do not meet this requirement are placed in a CIP and are visited quarterly by state monitoring staff. These visits may be regular monitoring visits to check progress or to provide T&T/A to the program. The subgrantee is placed in a CIP until at least 60 percent of units pass the monitoring during two (2) consecutive technical monitoring visits. Any findings are documented in the site monitoring checklist and detailed in a written report to the subgrantee.

Audit

Development's Audit Office reviews compliance with federal, state and local rules, regulations, laws and policies related to the receipt, expenditure, and reporting of grants. An audit is conducted in accordance with procedures prescribed by Development, to satisfy federal and state subgrantee monitoring requirements and those expressed or implied in grant agreements. Audits are reviewed, and results are incorporated into the weatherization risk assessment of each subgrantee.

Subgrantees that exhibit significant problems, actions or circumstances that increases the risk of fraud, waste and abuse of grant funds, are subject to additional Development review. Specific audit procedures would be performed at the request of Development.

An audit report is issued by Development's Audit Office within 30 days after the last day of audit fieldwork. The subgrantee must respond to any questioned costs, legal compliance findings or material weaknesses stated in the report. Each response must describe the actions the subgrantee has taken, or will take, to preclude the findings from reoccurring. Unresolved findings could result in disallowed costs, withholding of funds, suspension of funds, or other legal actions.

Tracking and Analysis

Ohio uses Montrak, an Excel based worksheet, to track the number of units completed, percentage of units monitored, track monitoring results, including dates for the visit, issuance of the report, and final resolution. Ohio also maintains a database that tracks and consolidates findings on technical visits by measure and type. Reports show both individual subgrantee and statewide results, which are shared with the OWTC to guide T&T/A.

T&T/A is provided by the OWTC for formal, required courses, and by state technical and administrative staff, when identified by need. Triggers for T&T/A include reports by Development, DOE, or another oversight group; request by the subgrantee; or requirement for additional training. The OWTC maintains a

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database of trained staff and the details of training completed and status (pass, fail, in progress, etc.). Subgrantees are responsible for tracking the credentials and training needs of their personnel and maintaining appropriate certifications. State monitors have access to the training database and check credentials of the personnel at subgrantees they monitor. Development requires updated training in the monitoring report when compliance issues are found. Client education is required for every eligible household. Subgrantees submit, each year with their Grant Management Plan, a list of trained staff persons who have completed the Client Education course offered by the OWTC, and date the course was completed. Client education is recorded on the Energy Savers Partnership Plan form, with one copy in the client file and the other copy staying in the home with the client for future reference.

Removal of Subgrantee

Ohio completes an annual risk assessment of subgrantees to evaluate performance and to determine if a subgrantee is administering an effective weatherization program. The Risk Assessment tool evaluates subgrantees based on administrative, technical and fiscal management. A rating of "high risk" for two consecutive years on the annual Risk Assessment performed by Development may result in a competitive proposal process for a subgrantee's territory, after the current contract expires.

Should the Risk Assessment rating result in a competitive proposal process for any subgrantee's territory, Ohio will proceed in accordance with 10 CFR 440.15. Additionally, the grant agreement with local subgrantees includes the following language regarding termination:

1. Effects of Termination. i) Procedure for Termination. If Grantor determines as provided in this Section 15 to terminate this Agreement, Grantor shall provide a written Notification of Intent to Terminate to the governing board of Grantee by certified mail. The Notification of Intent to Terminate shall identify in sufficient detail the charges for such proposed action, the sections of statutes, rules, regulations or contractual obligations that Grantee is charged with violating; and a statement of Grantee's right to request a public hearing on the proposed termination by making a written request within 30 days of the date of the mailing of the Notification of Intent to Terminate. Such notice shall also inform Grantee that Grantee may be represented by an attorney or by such other representative as designated by a majority of the governing body of Grantee. When any Notification of Intent to Terminate sent by certified mail is returned because of inability to deliver, the notice required shall be sent by ordinary mail evidenced by a certificate of mailing to the chairperson of Grantee. Grantor may terminate this Agreement in whole ("Complete Termination") or in part ("Partial Termination") pursuant to Ohio Administrative Code Rules 122:12, and cease payment accordingly. In the event of Partial Termination, Grantor and Grantee shall enter into an "Amended Grant Agreement" reflecting a revised Project. ii) Termination. In the event of Termination of this Agreement, all property and finished or unfinished documents, data, studies and reports purchased or prepared by Grantee under this Agreement shall be disposed of according to Grantor's directives, and Grantee shall be entitled to compensation for any unreimbursed expenses reasonably and necessarily incurred in the satisfactory performance of this Agreement. Grantee shall incur no new obligations after the date of the termination of this Agreement and shall cancel as many outstanding obligations as possible. Within 60 days after Termination of this Agreement, Grantee shall provide Grantor with a Closeout Report setting forth the total expenditure of the Grant Funds by Grantee and the status of the Project at the time of termination. Upon review of the Closeout Report, Grantor shall determine whether or not Grantee shall be required to refund any portion of the Grant Funds. The refund decision will be within the sole discretion of Grantor. In no event shall Grantee be required to refund an amount in excess of the total Grant Funds awarded under this Agreement as a result of any breach of this Agreement. iii) Effect of Termination. Notwithstanding any of the provisions of this section, Grantee shall not be relieved of its responsibility for damages sustained by Grantor by virtue of any breach of contract by Grantee, and Grantor may withhold any reimbursement to the Grantee for the purpose of setoff until such time as the exact amount of damages due Grantor from Grantee is agreed upon or otherwise determined.

Existing subgrantees also may elect to voluntarily relinquish the weatherization program. This must be completed in writing and signed by an authorized representative of the subgrantee. This also would necessitate a competitive process to reassign the territory through a request for proposal. A public hearing is required when a new permanent subgrantee is announced. In any case when the territory is relinquished by a subgrantee or a subgrantee is removed, existing subgrantee(s) may be requested to act as a temporary emergency subgrantee in order to ensure continuation of services without interruption to eligible clients.

V.8.4 Training and Technical Assistance Approach and Activities

Ohio's weatherization network receives Tier 1 and Tier 2 training from the OWTC. The OWTC is accredited by the Interstate Renewable Energy Council (IREC) to train Home Energy Professionals for the Retrofit Installer, Crew Leader, Energy Auditor, and QCI certifications. Additionally, all curriculums for the Retrofit Installer, Crew Leader, Energy Auditor, and QCI have been aligned with the Job Task Analysis (JTA) for each certification. Requirements for training and certification are developed in accordance with DOE Weatherization Assistance Program (WAP) guidelines and regulations and those of the NREL SWS, and the State of Ohio Weatherization Field Guide for Home Energy Updates. The OWTC received IREC accreditation for Retrofit Installer, Crew Leader and Energy Auditor in September 2016. The attached 2020 HWAP Training and Certification Requirements contains the course list for each weatherization position, and how they are integrated to provide a consistent training message that meets the JTA requirements.

All Energy Auditors and QCIs must attend and successfully pass a three-day inspector refresher course at the OWTC every three (3) years. All Crew Leaders must attend and successfully pass a refresher course every three (3) years. Development encourages all weatherization staff to attend job specific trainings and conferences (including Ohio's annual weatherization conference), to learn new skills and techniques to enhance Ohio's weatherization program. Development

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regularly reviews monitoring reports to determine if individuals require any additional training.

Training and certification requirements are reviewed on an annual basis by state technical and administrative staff in collaboration with the training and technical staff at the OWTC. The OWTC works to ensure that the training and technical requirements meet or exceed program standards as well as support quality outcomes including, but not limited to, a skilled, knowledgeable and qualified workforce, which translates to quality work standards in the field. Contractors are required to complete applicable trainings prior to starting work and are not charged for the cost of registration for any courses required for Ohio's weatherization program. Per diem and other costs are the responsibility of the contractor. Local subgrantees are advised to secure a retention agreement in exchange for the training, that would stipulate that contractors will work in the program, at a minimum, for a specific amount of time, and should be in correlation to the cost of the training provided.

Monitors check training databases to ensure that all staff are up to date on required training. Findings are recorded in monitoring reports and subgrantees are required to respond.

New weatherization contractors must complete required training prior to the start of work (Combustion for Contractors, Basic Weatherization Tactics, and LRRP). All other training may be completed within 180 days of the date of hire or contract signature, unless otherwise specified.

All new staff (agency or contractor) must complete required training (Basic Weatherization Tactics, and LRRP) within 180 days of the date of hire.

New HVAC contractors must complete Combustion for Contractors training prior to the start of work.

For a complete list of trainings in the Retrofit Installer Series, Crew Leader Series, Energy Auditor Series, QCI Series, and Heat Technician Series, see the HWAP Program Year 2020 Training and Certification Requirements (attached).

Infield technical assistance is provided to subgrantees through a variety of means from both Development and the OWTC. A referral for T&T/A can be initiated through a variety of means including, but not limited to:

- Results of an onsite monitoring visit or report by Development, DOE, or other oversight or evaluation entity;
- Request by the subgrantee;
- Supplemental training required by Development or recommended by the OWTC.

The OWTC maintains a training database for all workforce/personnel employed or previously employed by a subgrantee or approved private contractor. The database has the capacity to track student progress in detail, including student transcript of credentials, course completions, pass/fail valuations, and related certifications. While subgrantees are responsible for maintaining training and certification compliance for their workforce/personnel, the OWTC student database has limited capacity to support notification to subgrantees of pending recertification and/or training, to avoid noncompliance in training and technical requirements. Development monitoring staff has access to the OWTC database to validate credentials of the subgrantee personnel or request a report directly from the OWTC. Through continued collaboration, the OWTC and Development ensure that subgrantees remain in compliance in training and technical requirements and related certifications.

Client education is required for all eligible households and is recorded on the Energy Savers Partnership Plan form or equivalent. One (1) copy is placed in the client file and the other copy remains with the client for future reference. All Energy Auditors and QCIs are required to complete an eight-hour client education training through the OWTC to develop skills for client interaction and to explain the changes in the home, post-weatherization.

A. ASSESSMENT OF TRAINING AND TECHNICAL ASSISTANCE

Development staff analyze data on a variety of financial, production, and weatherization retrofit information. Trends indicating extremes in production and/or completed weatherization measures will be noted and tracked for appropriate follow up. The field representatives' monitoring reports are shared with the OWTC so trainings can be modified or customized based on needs. Additionally, the State maintains reports, including the report of Air Leakage Reduction by subgrantee that tracks the percentage of homes meeting the minimum reduction. This information is used to compare subgrantee effectiveness and direct training.

Onsite visits provide firsthand, observable evidence for T&T/A.

State funded weatherization skills training will be matched closely to techniques and program policies to ensure consistent and effective implementation. A Training and Student Database with a master list of all HWAP staff and their associated training records, has been developed to highlight the needs of the individuals working within the program.

B. PROVISION OF TRAINING AND TECHNICAL ASSISTANCE

The OWTC is an IREC accredited training provider. The OWTC provides a multifaceted approach to workforce training and development. Classroom instruction, written and visual materials, hands on instruction, and field experience provide a wide range of options to accommodate varied learning styles for adult learners.

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Funding for training activities provided through the OWTC is part of the T&T/A allocation to the State of Ohio. Annual funding of the OWTC is determined at the time of the DOE allocation. The OWTC has established training facilities at locations regionally in Ohio ensure that travel costs are minimized to subgrantees and approved private contractors. In addition to the funding from the DOE WAP allocation, the OWTC has diversified its funding revenue through procurement of federal, state, and private foundation grants and private contracts with contractors and utility providers. This diversification of funding streams has allowed the OWTC to bring additional training and technical resources to the Ohio WAP Provider Network.

The training schedule is updated on a quarterly basis and made available to the Ohio WAP Provider Network online through the training center's website at www.coadinc.org/owtc.

The OWTC has more than 30 years of experience in the development and implementation of weatherization training standards at both the state and federal level.

The OWTC staff participates in working advisory groups with Development to update technical standards and refine curriculum. The OWTC is responsible for creating training materials including technical documents, technical drawings and charts, instructor and student manuals, and digital media presentations. The training professionals also design and build the props and learning tools for specific hands on instruction. An example of this would be the full size, fully functional "prop house" within the main facility allowing simulated diagnostic testing and hands on training to be conducted in a controlled environment.

Courses in building science, retrofit energy efficiency measures, heating unit inspection, heating unit repair, and lead safety are provided with H&S training integrated into each module. Each of the training professionals on staff are required to become BPI certified in Analyst and Envelope Professional, and several hold additional certifications, including BPI Proctor status.

The feedback from various oversight entities at all levels, including but not limited to inspector general reports, federal and state monitoring, and federal and state audits, are used to develop or modify current policies and to direct program T&T/A.

Training and certification requirements are provided by the OWTC and include the competencies, knowledge, skills, and abilities for a skilled workforce necessary to perform quality work in the field as described in the JTA identified by NREL.

Continuing Education Units (CEUs) will be made available to subgrantees and workforce to ensure knowledge, skills, abilities and technical competencies remain current. Courses offered, reflect a commitment to ongoing education and skill building, as well as provide opportunities to have access to new technologies and technical advances in theory, lab, and field practice. The continued expansion of available CEUs supports the workforce in holding other credentials in the industry that support higher outcomes in the field.

T&T/A funds are available to support locally initiated training and to make effective use of the training center. To assure coordination of training activities, all T&T/A funds shall be itemized and budgeted into the following categories:

- • Costs for travel and per diem for attendance at the OWTC for T&T/A workshops, seminars, meetings, or classes.
- Supplemental training not offered by the OWTC for HWAP staff. Training must relate directly to the attendee's HWAP job duties.
- Purchase of training materials, including training and testing costs, necessary to meet OSHA safety standards.
- Percentage of salary for a staff person responsible for ensuring that training, safety requirements and needs are met, and to oversee in-house weatherization training.
- Travel for HWAP staff to attend conferences, meetings, and seminars.

Development shall continue to assure an effective exchange of program information through the following:

- • Active involvement with the HWAP PAC and Technical Subcommittee;
- Promotion of regional meetings initiated by Regional Representatives of the PAC at which management, technical and general informational topics will be discussed according to current need;
- Scheduling statewide weatherization meetings;
- Updates to program management guidance, including Operations Memos, Information Updates and revisions to the HWAP Policies and Procedures Manual, when necessary;
- Continued meeting of the working group consisting of Development and OWTC staff, to develop new training approaches and refine the existing courses to best meets the needs of the network; and
- Encouragement of information exchange and skills transfer among subgrantees on an informal basis.

Additionally, appropriate representation is recommended at national conferences and DOE sponsored events such as Home Performance Coalition, the National Weatherization Conference, National Association for State Community Service Programs conferences, Energy Out West, and/or other regional meetings.

Please see attachment for Development's transition plan to web-based software v10 of NEAT and MHEA.

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C. ATTENDANCE/TRAINING REQUIREMENTS

Attendance at state sponsored trainings may be required based on identified need to support remediation of program deficiencies and/or to ensure competence in specific areas. In such cases, subgrantee attendance will be required as a matter of program compliance. Failure to attend any scheduled training without due notice may result in a service charge to the subgrantee, per the cancellation policy of the OWTC. This service charge is not an allowable T&T/A expense and must be paid by unrestricted/nonfederal funds.

T&T/A funds may be used a maximum of three (3) times for QCI certification exam process (written and/or field).

D. ASSESSMENT OF STATE TRAINING AND TECHNICAL ASSISTANCE ACTIVITIES

Assessment of activities will be accomplished by review of the following:

- Local training activities and local T&T/A expenditure reports;
- The OWTC monthly attendance and quarterly activity reports;
- Quarterly review of the OWTC to measure and track training effectiveness;
- Onsite monitoring of local programs;
- Review of local T&T/A curriculum and activities.

All attendees receive a certificate for successfully completing each course, showing milestones met in their professional development plan, which are maintained by subgrantees and reviewed by state monitors upon request. Feedback from subgrantees is used to direct training and policy, and all monitoring reports are shared with the OWTC staff. Additionally, a work group has been formed that meets quarterly to discuss training issues and requirements and to direct and improve the process of training our weatherization network. By doing so, subgrantees are compared for effectiveness in energy efficiency. Ohio will continue to improve operations, provide effective services, and develop new ways to excel at training the network of providers and weatherizing homes.

The OWTC will track and report to the Manager, Energy Efficiency Programs, of Development on a quarterly basis, the following performance metrics:

- Number of individuals on a waiting list
- Courses provided
- In the field technical assistance
- Expansion of training portfolio/CEUs

Percent of overall trainings

Comprehensive Trainings:	80.0
Specific Trainings:	20.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	39.0
Percent of budget allocated to Crew/Installer trainings:	60.0
Percent of budget allocated to Management/Financial trainings:	1.0

V.9 Energy Crisis and Disaster Plan

Ohio's ability to leverage additional funds has allowed most subgrantees to meet the emergency demands of their clients without significant changes to the annual plans. In the event of a declared natural or manmade disaster, Ohio will allow subgrantees to assist their eligible clients with weatherization funds to the extent that the services are in support of eligible weatherization work. The allowable expenditures under the HWAP are limited to include the following:

- The cost of Incidental/Additional Repairs to an eligible dwelling unit, if such repairs are necessary to make the installation of weatherization materials effective, per 10 CFR 440.18(d)(9);
- The cost of eliminating H&S hazards, which is necessary before the installation of weatherization materials, per 10 CFR 440.18(d)(15).

In the event of a declared federal or state disaster (those in which the President of the United States or the Governor of the State of Ohio has

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declared the event an emergency), subgrantees may return to a dwelling unit previously reported as a completion to the DOE that has been "damaged by fire, flood, or act of God and repair of the damage to weatherization materials is not paid for by insurance" and it may be re-weatherized, without regard to date of previous weatherization, per 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit salvageable as well as habitable and the damage to the materials must not be covered by insurance or other form of compensation. In these cases, the work can be addressed without prior approval or any special reporting.

The subgrantee may use HWAP funds to perform functions to protect the federal funding investment. Such activities may include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local subgrantee weatherization files and records during the initial phase of the disaster response. The use of HWAP funds to pay weatherization personnel to perform relief work in the community as a result of a disaster is not allowable. The use of weatherization vehicles and/or equipment may be used to assist disaster relief activities; however, the HWAP must be reimbursed. Reprioritization of households located in a disaster area is permissible as long as the households are determined eligible for the weatherization, meet one of the priorities described in 10 CFR 440.16(b), and are free and clear of any insurance claim or other form of compensation resulting from the damage incurred from the disaster. Documentation must be placed in the client file.