

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007946		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Pennsylvania, Commonwealth of Commonwealth Keystone Bldg., 4th Floor Harrisburg, PA 171200225		4. Program/Project Start Date 07/01/2019	5. Completion Date 06/30/2022

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Federal	81.042	\$ 2,302,754.00		\$ 54,232,483.00		\$ 56,535,237.00
2. STATE			\$ 0.00		\$ 0.00	\$ 0.00
3.						
4.						
5. TOTAL		\$ 2,302,754.00	\$ 0.00	\$ 54,232,483.00	\$ 0.00	\$ 56,535,237.00

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	\$ 752,763.00	\$ 0.00	\$ 694,927.00	\$ 0.00	\$ 1,447,690.00
b. Fringe Benefits	\$ 587,546.00	\$ 0.00	\$ 536,334.00	\$ 0.00	\$ 1,123,880.00
c. Travel	\$ 202,792.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 202,792.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 774,289.00	\$ 3,279,908.00	\$ 6,726,194.00	\$ 647,454.00	\$ 52,510,994.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 411,382.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 411,382.00
i. Total Direct Charges	\$ 2,728,772.00	\$ 3,279,908.00	\$ 7,957,455.00	\$ 647,454.00	\$ 55,696,738.00
j. Indirect Costs	\$ 435,999.00	\$ 0.00	\$ 402,500.00	\$ 0.00	\$ 838,499.00
k. Totals	\$ 3,164,771.00	\$ 3,279,908.00	\$ 8,359,955.00	\$ 647,454.00	\$ 56,535,237.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007946		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Pennsylvania, Commonwealth of Commonwealth Keystone Bldg., 4th Floor Harrisburg, PA 171200225	4. Program/Project Start Date 07/01/2019		
	5. Completion Date 06/30/2022		

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 2,302,754.00	\$ 0.00	\$ 54,232,483.00	\$ 0.00	\$ 56,535,237.00

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) LEVERAGING	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 1,447,690.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 1,123,880.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 202,792.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 33,815,552.00	\$ 6,167,271.00	\$ 409,163.00	\$ 282,000.00	\$ 52,510,994.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 411,382.00
i. Total Direct Charges	\$ 33,815,552.00	\$ 6,167,271.00	\$ 409,163.00	\$ 282,000.00	\$ 55,696,738.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 838,499.00
k. Totals	\$ 33,815,552.00	\$ 6,167,271.00	\$ 409,163.00	\$ 282,000.00	\$ 56,535,237.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007946		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Pennsylvania, Commonwealth of Commonwealth Keystone Bldg., 4th Floor Harrisburg, PA 171200225		4. Program/Project Start Date 07/01/2019	5. Completion Date 06/30/2022

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 2,302,754.00	\$ 0.00	\$ 54,232,483.00	\$ 0.00	\$ 56,535,237.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) FINANCIAL AUDITS	(2)	(3)	(4)	
a. Personnel	\$ 0.00				\$ 1,447,690.00
b. Fringe Benefits	\$ 0.00				\$ 1,123,880.00
c. Travel	\$ 0.00				\$ 202,792.00
d. Equipment	\$ 0.00				\$ 0.00
e. Supplies	\$ 0.00				\$ 0.00
f. Contract	\$ 409,163.00				\$ 52,510,994.00
g. Construction	\$ 0.00				\$ 0.00
h. Other Direct Costs	\$ 0.00				\$ 411,382.00
i. Total Direct Charges	\$ 409,163.00				\$ 55,696,738.00
j. Indirect Costs	\$ 0.00				\$ 838,499.00
k. Totals	\$ 409,163.00				\$ 56,535,237.00
7. Program Income	\$ 0.00				\$ 0.00

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Action Housing, Inc. (Pittsburgh)	\$5,238,341.00 444
Armstrong County Community Action Agency (Kittanning)	\$560,021.00 56
Berks Community Action Program (Reading)	\$963,065.00 94
Blair County Community Action Program (Altoona)	\$725,480.00 71
Bucks County Opportunity Council, Inc. (Doylestown)	\$933,367.00 94
Carbon County Action Committee for Human Services (Lehighton)	\$487,896.00 50
Center for Community Action (Everett)	\$1,412,777.00 139
Central PA Community Action Program, Inc. (Clearfield)	\$1,007,528.00 100
Commission on Economic Opportunity of Luzerne County (Wilkes-Barre)	\$1,998,332.00 216
Community Action Agency of Delaware County (Boothwyn)	\$4,000,750.00 397
Community Action Committee of Lehigh Valley, Inc. (Bethlehem)	\$1,319,441.00 130
Community Action Partnership of Mercer County (Sharon)	\$988,520.00 96
Community Action, Inc. (Punxsutawney)	\$1,158,223.00 113
Energy Coordinating Agency (Philadelphia)	\$5,258,059.00 513
Erie County Housing Authority (Corry)	\$687,297.00 45
Greater Erie Community Action Committee (Erie)	\$217,539.00 22
Housing Authority of the County of Beaver (Beaver)	\$878,966.00 87
Lawrence County Social Services (New Castle)	\$812,675.00 83
Lycoming/Clinton Counties Commission for Community Action (Williamsport)	\$780,634.00 76
Monroe County Redevelopment Authority (Stroudsburg)	\$619,416.00 60
Northern Tier Community Action Corporation (Emporium)	\$700,025.00 66
Northumberland County Weatherization (Sunbury)	\$794,644.00 79
Northwest PA Weatherization, Inc. (Meadville)	\$1,144,327.00 111
Philadelphia Housing Development Corp (Philadelphia)	\$974,284.00 100

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

Redevelopment Authority of the County of Fayette (Uniontown)	\$844,272.00 83
Schuylkill County Community Action (Pottsville)	\$708,510.00 72
Scranton/Lackawanna Human Development Agency (Scranton)	\$1,026,703.00 102
SEDA-Council of Governments (Lewisburg)	\$1,166,857.00 118
South Central Community Action Program, Inc. (Gettysburg)	\$1,927,946.00 191
Tableland Services, Inc. (Somerset)	\$623,960.00 63
The TREHAB Center (Montrose)	\$907,912.00 91
Warren/Forest Economic Opportunity Council (Warren)	\$695,782.00 75
Wayne County Redevelopment Authority (Honesdale)	\$657,600.00 65
Weatherization, Inc. (Huntingdon)	\$470,926.00 47
Westmoreland Housing Authority (Greensburg)	\$1,137,010.00 111
York County Board of Commissioners (York)	\$899,426.00 89
Total:	\$44,728,511.00 4,349

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)	4,329
	4,329
Rewatherized Units	20
	20

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	4,329
C Total Units Reweatherized	20
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	4,349
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	\$33,815,552.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	4,349
H Average Program Operations Costs per Unit (F divided by G)	\$7,775.48
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J Total Average Cost per Dwelling (H plus I)	\$7,775.48

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

IV.3 Energy Savings

Method used to calculate savings: <input checked="checked" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	4349	29.3	127426
Prior Year Estimate	1859	29.3	54469
Prior Year Actual	1536	29.3	45005

Method used to calculate savings description:

IV.4 DOE-Funded Leveraging Activities

The Department continues to explore and develop partnerships with utility companies, the Public Utility Commission (PUC), and other entities that will generate nonFederal resources for Weatherization. Staff will continue to expand the leveraging of utility funds through the coordination of treatment costs with Electric Distribution Companies (EDCs) and Natural Gas Distribution Companies (NGDC) through contracts with subgrantees and directly with the Department. Utility Coordination Committee meetings continue to discuss prioritization of clients, the possible creation of a centralized database, the overall adoption of the Standard Work Specifications (SWS) and worker certifications for the utility work done for programs such as the Low Income Usage Reduction Program (LIURP).

Subgrantees have been encouraged to contact the EDCs and NGDCs in their service territory and have established procedures for the coordination of base load treatment costs wherever possible. A statewide joint WAP/Utility Home Performance Conference is being considered for 2022. Feedback regarding the conference held in 2019 stated that it was an ideal opportunity to earn continuing education credits, network with fellow WAP agencies and utility companies, and various topics were reviewed within Building Envelope, HVAC Technologies and Ventilation to include Program and Operations' topics.

The Department continues to implement an Invitation to Qualify (ITQ) for WAP leveraging activities. An ITQ is a multiple award process which is used to prequalify contractors through the PA Department of General Services application process. The Commission on Economic Opportunity (CEO) and the Pennsylvania Utility Law Project (PULP), a specialized service of Regional Housing Legal Services submitted proposals and were placed on a statewide list of similar contractors. CEO and PULP were chosen to advocate, participate and/or intervene in rate cases, acquisitions and mergers involving both electric and gas companies to ensure favorable outcomes for low-income residents based on their response to the scope of work requirements, experience, and knowledge of the Weatherization Assistance Program. CEO focused on rate case interventions while PULP focused on the policy and advocacy activities. Both agencies provided representation on behalf of low-income residents at various utility proceedings, program reviews, and legislative hearings throughout the state.

CEO and PULP focuses their efforts on the following activities:

- ACT 129 proceedings
- Universal Service and Energy Conservation Program reviews
- Retail Market proceedings
- Default Service proceedings
- Administrative and Legislative Advocacy

Many of these activities and accomplishments cover multiyear time periods, therefore the overall amount of funds generated from the combined leveraging activities of both agencies is accomplished annually but any annual amount provided would be estimates based on the overall amounts. Therefore, for this plan, the \$115M leveraged over at least a 5-year timeframe would work out to approximately \$23M a year. This increased funding results in additional weatherization services for low-income households and since the PA Weatherization agencies work on coordinating the utility funds with the weatherization work done on the eligible homes, the increased funding helps produce an increased amount of homes at a lower average cost.

The percentage of contract funds allocated for leveraging activities is .5% at \$94,000. For FY 2021-2022, along with the reporting the dollar amount gained, the number of homes weatherized with the utility funds will be reported. In addition, the Weatherization agencies who retain their utility contracts as a result of the leveraging activities will be reported.

The Department plans to implement the ITQ process again in 2021-2022 to continue similar rate case interventions and various policy and advocacy activities.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

IV.5 Policy Advisory Council Members

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

Center for Community Action	Type of organization: Local agency Contact Name: Wendy Melius Phone: 8146433010 Email: wmelius@ccaofpa.org
Columbia Gas of Pennsylvania	Type of organization: Utility Contact Name: Deb Davis Phone: 7244166316 Email: ddavis@nisource.com
Commission on Economic Opportunity of Luzerne Co.	Type of organization: Local agency Contact Name: Eugene Brady Phone: 5708260510 Email: genebradyceo@gmail.com
Community Action Association of PA	Type of organization: Non-profit (not a financial institution) Contact Name: Dan Leppo, Acting Executive Director Phone: 7172331075 Email: dan@thecaap.org
Consultant/Advocate	Type of organization: For-profit or Corporate (not a financial institution or utility) Contact Name: Mitch Miller Phone: 7179032196 Email: mmiller77@hotmail.com
Department of Health	Type of organization: Unit of State Government Contact Name: David Saunders Phone: 7175473315 Email: davidsaund@pa.gov
Department of Human Services	Type of organization: Unit of State Government Contact Name: Brian Whorl Phone: 7177874081 Email: bwhorl@pa.gov
Department of Human Services	Type of organization: Unit of State Government Contact Name: Cathy Buhrig, Director Phone: 7177874081 Email: cbuhrig@pa.gov
Dept. of Environmental Protection	Type of organization: Unit of State Government Contact Name: Lindsay A. Byron Phone: 7177728951 Email: lbyron@pa.gov
Energy Association of Pennsylvania	Type of organization: Non-profit (not a financial institution) Contact Name: Donna Clark Phone: (717)901-0600 Email: dclark@energypa.org
Energy Coordinating Agency of Philadelphia	Type of organization: Local agency Contact Name: Steve Luxton Phone: 2156091033 Email: stevel@ecasavesenergy.org
Lawrence County Community Action Partnership	Type of organization: Non-profit (not a financial institution) Contact Name: Tom Scott, CEO Phone: 7246587258 Email: tscott@lccap.org
PA Public Utility Commission	Type of organization: Unit of State Government Contact Name: Regina Carter Phone: 7174255441 Email: regincarte@pa.gov
PA Utility Law Project	Type of organization: Non-profit (not a financial institution) Contact Name: Elizabeth R. Marx Phone: 7177103825 Email: emarxpulp@palegalaid.net
	Type of organization: Other

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

Pennsylvania College of Technology	Contact Name: Alison Diehl, Director Phone: 5703274768 Email: aad1@pct.edu
Pennsylvania Utility Commission	Type of organization: Unit of State Government Contact Name: Haley Book Phone: 7174257402 Email: hbook@pa.gov
PPL Electric Utilities	Type of organization: Utility Contact Name: Melinda Stumpf Phone: 4846343298 Email: mstumpf@pplweb.com
Public Utility Commission	Type of organization: Unit of State Government Contact Name: Sarah Dewey Phone: 7177054029 Email: sdewey@pa.gov

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

Date Held Newspapers that publicized the hearings and the dates the notice ran

04/11/2019 A public hearing on the 2019 plan was held on April 11, 2019 at the Commonwealth Keystone Building, 400 North Street, Harrisburg, Pennsylvania. Notice of the Hearing was filed with the Legislative Reference Bureau, published in the Pennsylvania Bulletin on March 30, 2019, and posted on the Department website on March 29, 2019.

04/22/2020 Due to the current COVID-19 pandemic and stay at home order in PA, the public hearing on this plan was held via conference call on April 22, 2020. Notice of the Hearing details was filed with the Legislative Reference Bureau, published in the Pennsylvania Bulletin on April 11, 2020, and posted on the Department website on April 10, 2020. Here is a link to the PA Bulletin: <http://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol50/50-15/521.html&search=1&searchunitkeywords=>

04/22/2021 Due to the COVID19 pandemic, the public hearing on this plan was held via conference call on April 22, 2021. Notice of the Hearing details was filed with the Legislative Reference Bureau, published in the Pennsylvania Bulletin on April 10, 2021, and posted on the Department website on April 09, 2021. Here is a link to the PA Bulletin: <http://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol51/51-15/567.html> Justification for use of PA Bulletin: The Pennsylvania Bulletin is used according PA Code. In addition to advertising in the PA Bulletin, the DOE State Plan Public Hearing and posting was also announced at the PAC Meeting and Weekly Network Calls as well as posting the plan on the DCED website. The information for the Pennsylvania Code included at this website has been derived directly from the Pennsylvania Code, the Commonwealth's official publication of rules and regulations. Cite all material in the Pennsylvania Code by title number and section number. Example: 1 Pa. Code § 17.51. The information for the Pennsylvania Bulletin included at this website has been derived directly from the Pennsylvania Bulletin, the Commonwealth's official gazette for information and rulemaking. The latest published information may be accessed every Friday at 9 a.m. EDT. Cite all material in the Pennsylvania Bulletin by volume and page number. Example: 17 Pa.B. 639.

IV.7 Miscellaneous

The Principal Investigator and Recipient Business Officer for this grant is Ms. Lynette Praster, Director, Center for Community Services of the Department of Community and Economic Development, Commonwealth Keystone Building, 400 North Street, 4th Floor, Harrisburg, PA 17120-0225. Phone is (717) 720-1350 and email is lpraster@pa.gov.

Agency Funding

DCED plans to extend the funding expenditure period for the FY19/20 and FY20/21 DOE funds and combine the three FY's of funding(19/20, 20/21, & 21/22) in order to allow more time for the expenditures due to delays caused by the COVID19 pandemic closures. Combining the three fiscal years of funding will also help keep the average cost per unit within the allowable limit of \$7,776. In addition, please note that for purposes of the State Plan posting for Public Comment, only the 2021 Budget was included. The 2019 and 2020 Budgets were approved previously.

The Department continues to use the historical formula for subgrantees that was implemented in 2007 which establishes a capacity framework to deliver WAP. This formula of funding establishes a baseline capacity in order for each agency to maintain a certified workforce, conduct WAP according to the required SWS and adjust to any potential funding lapses. This formula is based on fifty percent (50%) of the funds utilizing each agency's service area percentage of low-income population to the state total low-income population at 200% of the Federal Poverty Guidelines; thirty percent (30%) on the heating degree days to the state total; and twenty percent (20%) of the funds on the subgrantees' established capacity level.

For program year 2021-2022, DCED plans to continue to use the historical formula in order to achieve consistency in closing out the five-year DOE grant and remain focused on achieving 100% production, as projected, with the expenditure of all funds. This historical formula and the old data upon which it is

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

based has been questioned as related to agency capacities. In addition, an ongoing analysis of the data reflects some changes in heating degree days, low-income population and their effects on PA counties and regions. Therefore, a planning strategy will continue into the 2021-2022 program year to consider a revision of the formula that will address capacity and production.

For program year 2021-2022, income eligibility is set at 200% of Federal Poverty Guidelines and the allowable average cost per dwelling unit is \$7,776.

The Department will reallocate funds based on the WAP Risk Assessment results as well as performance including meeting production goals over the contract period. For annual DOE allocations, subgrantees who have not met their production goals for the prior year may not be awarded 50% of their regular allocation. The subgrantees will receive written notification of the reason(s) for the reduction and the offer of guidance and assistance in resolving the issues. They must provide a specific timeline to meet the required performance criteria and production goals and respond to the Department's offer of guidance and assistance in resolving the issues with specific needs that can be addressed.

In addition, since this is the proposed last year of the DOE grant (Year 5), if a specific agency timeline or production goal is not met as of December 31, 2021, funds will be reduced from under performing agencies and reallocated to agencies that will be able to spend the funds, meeting all quality and compliance standards. Prior to reducing the final annual funding level of any subgrantee, as a consequence of inadequate performance, the Department shall provide in writing to the subgrantee the specific reasons for the final funding reduction for the program year. PA has implemented a risk and performance-based allocation which is driven by a review of subgrantees' production, work quality, compliance and reporting. The Risk Level and due process for noncompliance requirements are distributed via this DOE state plan and to each agency when they are notified of their Risk Assessment results.

During the current review of poverty and heating degree days data in combination with various capacity issues uncovered during the 2021 Risk Assessment process, it appears that the population needs for weatherization services combined with ongoing compliance with all program requirements has challenged the network as it is currently organized. For the upcoming new DOE grant, DCED is continuing a planning strategy in partnership with the WAP agency network and the Policy Advisory Council (PAC) to further analyze the shifting data trends as applied to individual agency capacity in order to reconsider and recreate a sustainable agency framework for Pennsylvania.

Policy Advisory Council (PAC)

In accordance with 10 CFR, Section 440.17, the Department has established a Weatherization and Energy Conservation Policy Council to advise the Department on issues related to the administration of the weatherization program. The council has reviewed the by-laws, established sub-committees, meets quarterly, and regularly recruits volunteers. The PAC reviews the annual state plan, and where feasible, its comments and recommendations are included prior to submission of the annual Plan to the Department of Energy.

The Policy Advisory Council includes representatives of electric utilities, utility associations, subgrantees, energy advocacy groups, social service agencies and other governmental agencies. The current Policy Advisory Council members each have special qualifications and sensitivity with respect to representing low-income populations to include elderly, disabled, children, minorities, energy conservation and efficiency, energy research, the environment, public service, and housing.

American Consumer Satisfaction Index Survey

DCED continues to work off of the activities conducted during the 2019-20 program year to address the 2019 ACSI scores. Given the COVID-19 pandemic, however, operational challenges certainly faced us in order to maintain the momentum we had gained from the last program year. We continued to put into place, however, communication plans that have opened up the conversation with the agencies and among them as to how we all were coping with the challenges of the pandemic. The following reflects our efforts during a most unusual program year in order to remain committed to improvements in the development of the State Plan and the frequency and clarity of communication and consistency of technical assistance:

- o Weekly network calls began on May 19, 2021 and involve DCED WAP staff and WAP subgrantees for the purpose of discussing any and all WAP operational issues.
- o Ongoing numerous phone calls between agency and DCED staff were also conducted regarding operational and compliance issues that agencies faced at the onset and during the COVID-19 pandemic.
- o DCED WAP staff partnered with the Penn College Clean Energy Center to create the recommended safety practices for resuming WAP production during COVID-19 pandemic. These practices were thoroughly discussed during the weekly network calls.
- o WAP Training and Technical Assistance funds were distributed to all subgrantee agencies so that workers could continue to access their online training requirements during the shut-downs experienced at the onset of the COVID-19 pandemic.
- o Weekly Production and Expenditure Reports were enhanced with dashboards and are sent to the WAP Network weekly in order to stay abreast of production activities given the combined program year efforts.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- The weekly network calls held in February and March of 2021 included an overall State Plan explanation and discussion topics on the contents of the State Plan as it was being drafted and before it was released publicly.
- An allocation committee made up of volunteer network agencies and members of the PAC continue to meet in order to make recommendations for potential changes to the current allocation formula.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

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

Eligibility Determination

A. A dwelling unit is eligible for weatherization services only if:

- i. A person living within the dwelling unit, regardless of age, has received cash assistance payments under Title IV or XVI of the Social Security Act at any time during the 12month period preceding the Eligibility Determination for weatherization assistance (see Section A. ii, "Eligibility by Title IV or XVI of the Social Security Act"); or
- ii. The total annual income of all occupants living together within the dwelling unit is at or below 200 percent of the Federal Poverty Income Guidelines (FPIGs) as established by the US Department of Health and Human Services Office of Management and Budget for the 12month period preceding the Eligibility Determination.
 - a. Subgrantees are responsible for updating the FPIGs they have on record as often as they are updated on the website of the U.S. Department of Health and Human Services.
 - b. Income Eligibility is calculated using income of the prior 12 months for all occupants residing in the dwelling unit.
 - c. Regardless of when a person begins occupying a client's dwelling unit, the income of all persons occupying the dwelling unit at the time of Eligibility Determination must be included for the entire previous twelve months.
 - d. The FPIG's are generally updated once a year at the beginning of the calendar year.

B. The current version can be found at: <https://aspe.hhs.gov/poverty-guidelines>

- i. Eligibility by Title IV or XVI of the Social Security Act
- ii. Title IV of the Social Security Act refers to Temporary Assistance for Needy Families (TANF) while Title XVI of the Social Security Act refers to Supplemental Security Income (SSI).
- iii. Eligibility under TANF or SSI is automatic and, proof of eligibility must be conducted.
 - a. Note: Social Security Disability Insurance (SSDI) is covered under Title II of the Social Security Act and is not addressed in 10 CFR 400 or DOE guidance; therefore, SSDI payments are included as income.

C. All applicants are U.S. Citizens or Lawfully Admitted Non-Citizen

- i. PA WAP will abide by section 431 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) – H.R.3734 passed by the 104th Congress, commonly known as the welfare reform law. The act covers larger groups of lawfully admitted non-citizens.
- ii. Lawfully admitted non-citizens are eligible to receive assistance and services under the WAP and LIHEAP programs so long as they meet all other WAP and LIHEAP requirements. Proof of identity is required.
- iii. Subgrantees should refer to H.R. 3734 for guidance on lawfully admitted non-citizens at this link: [H.R.3734 - 104th Congress \(1995-1996\): Personal Responsibility and Work Opportunity Reconciliation Act of 1996 | Congress.gov | Library of Congress](https://www.congress.gov/104/legislation/1996/3734) and the DCED Directive, Eligibility, Client Prioritization and Weatherization Service List.

Income Determination

A. Income Inclusions

- 1. Income is defined as cash receipts earned and/or received by the clients before taxes and deductions but not the Income Exclusions listed

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

immediately below.

2. All income that is not specifically excluded must be included.
3. Cash receipts include, but not limited to, the following:
 - i. Money, wages and salaries before taxes and any deductions
 - ii. Net receipts from nonfarm or farm self employment (receipts from a person's own business or from an owned or rented farm less deductions for business or farm expenses)
 - iii. Regular payments from social security including SSDI, railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, training stipends, alimony, and military family allotments
 - iv. Private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments
 - v. Dividends and/or interest
 - vi. Net rental income and net royalties
 - vii. Periodic receipts from estates or trusts
 - viii. Net gambling or lottery winnings

B. Income Exclusions: The following cash receipts are not considered sources of income for the purposes of determining income eligibility:

1. Capital gains
2. Any assets drawn down as withdrawals from a bank
3. Money received from the sale of property, house, or car
4. Onetime payments from a welfare agency to a family or person who is in temporary financial difficulty
5. Tax refunds
6. Gifts, loans, or lumpsum inheritances
7. College scholarships
8. Onetime insurance payments, or compensation for injury
9. The value of food and fuel produced and consumed on farms
10. The imputed value of rent from owner-occupied nonfarm or farm housing;
11. Depreciation for farm or business assets;
12. Combat zone pay to the military
13. Reverse Mortgages
14. Payments for the care of Foster Children
15. Child Support Whether received by the Payee or paid by the Payor, child support payments are not considered sources of Income for the purposes of determining income eligibility.
 - i. Payee: Child support received by a Payee from any state program or individual during an applicable tax year is not considered income (and is excluded) for the purposes of determining eligibility.
 - ii. Payor: Child support paid by a Payor through a state program and/or to an individual may not be deducted from income (and is included for purposes of determining eligibility).
16. Noncash benefits
 - i. Noncash benefits refer to benefits that the client does not pay as cash or receive as cash. These may include:
 - a. Employee fringe benefits, food, or housing received in lieu of wages;
 - b. The employer or union paid portion of health insurance;
 - c. The noncash components of Federal noncash benefit programs such as Medicare, Medicaid, Food Stamps, school lunches, and housing assistance.
 - d. Deductions from a paycheck are not considered non-cash and would, therefore, be included. Examples include:
 1. Included as Income: If a client's regular social security is \$10,000 per year, but 10% is automatically deducted for Medicare, then the client only receives \$9,000. When figuring income for WAP, though, this client's annual income from Social Security is \$10,000, not \$9000 because this is not considered a noncash benefit.
 2. Excluded from Income: If the same client receives, through Medicare, noncash medical services (prescription drugs, a surgery, or some other noncash service) valuing \$30,000, these services would be excluded because they are noncash benefits. In this case, the client's income is still \$10,000, not \$40,000.

Income Eligibility Verification SignOff

- A. If the household income has increased the subgrantee must redetermine income eligibility.
- B. If the household size and/or composition changed such that the income eligibility no longer qualifies the dwelling unit, the subgrantee must either re-determine income eligibility or defer the client.
- C. The Income Eligibility Verification SignOff must be included in the Client File.
 1. The Income Eligibility Verification SignOff must be dated no earlier than one week prior to the audit and no later than the date of the audit.
 2. Subgrantees must defer clients who do not sign the Income Eligibility Verification SignOff. Such clients may not receive weatherization services until the client signs the Income Eligibility Verification SignOff.
 3. For subgrantees whose clients sign the Income Eligibility Verification SignOff on the date of the audit, it is recommended that, prior to the audit, subgrantees notify clients that they will have to sign the Income Eligibility Verification SignOff. It is suggested that at this same time, subgrantees

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

verbally verify with clients that their eligibility status has not changed.

Income Eligibility Validation Period

A. Weatherization validation periods defined:

- a. Weatherization services in the dwelling unit are considered to begin on the date of the audit.
- b. For reporting purposes, weatherization services in the dwelling unit are considered to be complete when marked complete in Hancock.

B. Income Eligibility Validation Period

1. Eligibility Determination should occur no earlier than twelve months prior to the completion of weatherization services in the dwelling unit.
 - i. If circumstances prevent the completion within the twelvemonth timeframe from the date of the audit and work has begun, there must be documentation in the client file explaining the reason/s for the delay and eligibility would remain valid.
 - ii. If the audit has been conducted but no work started, eligibility determination is only valid for twelve months from the audit date and eligibility must be re-determined.

Proof of Income

A. Subgrantees must acquire proof of eligibility and thoroughly document in the Client File all aspects of Eligibility Determination and Proof.

1. Methods of Proof

- i. The following subsections are nonexhaustive collections of examples of documents providing proof of eligibility; as such other forms of eligibility proof may exist or in some cases, the listed methods may be inadequate. Regardless of these examples, subgrantees are responsible for proving eligibility.
- ii. Proof of LIHEAP eligibility is not adequate proof of eligibility for WAP, except when DCED specifically instructs otherwise (for certain rare timesensitive special projects, DCED may give specific instructions that allow subgrantees to prove WAP eligibility through LIHEAP eligibility).
- iii. LIHEAP Crisis eligibility is documented by the completed Crisis Interface Referral Form.
- iv. No matter what method is used, proof of eligibility must be thoroughly established and fully and completely documented in the Client File.
- v. Any document signature requiring notarization may be either:
 - a. Notarized; or
 - b. Witnessed by a subgrantee representative, but only if:
 1. The person(s) signing the document(s) provide valid proof of identity (this proof of identity must be documented with the signed documents); and
 2. The subgrantee representative signs and dates the document(s) as a witness to verify the identity of the person(s) signing the document(s).

B. Proof of Eligibility for Title IV or XVI of the Social Security Act

1. Title IV, Temporary Assistance for Needy Families (TANF): Statement from local Department of Human Services office
2. Title XVI, SSI, Supplemental Security Income
 - i. Statement from the local Social Security Office, using Form SSA3288 (or a "benefit verification letter") requesting the appropriate benefits information.
 - ii. Statement from the Social Security Administration (SSA) by requesting a "Proof of Income Letter" through the SSA website.
 - iii. Applicable "Notices of Benefit Amount," received in December, and describing the following year's monthly benefit.
3. Regular Social Security Benefits
 - i. Any of the items listed above for SSI
 - ii. Copies of social security checks or bank statements showing direct deposits (if Medicare or other payments are deducted these should be added to the total)

C. Income Documentation

1. Wages or Salaries

- i. Statement from employer stating wages, rate of compensation, or pay stubs
- ii. A W2 or 1099 may be used to verify income for the prior 12 months at any point during the calendar year **if 12 months of income can be verified. This verification can be partially from the W2 or 1099 and the other portion must be the other months' proof of income, i.e., pay stubs, pensions or selfcertification** When reviewing a W2, the Earnings Summary should also be reviewed to confirm the gross earned income amount before any elective deferrals.
- iii. Self-employment/Business Income
 - a. Notarized documentation providing a detailed description of gross income received, less expenses (i.e. net income)
 - b. Quarterly or annual signed tax forms (including appropriate schedules)
 - c. If the subgrantee becomes aware of a business operated from the private residence or a commercial location, the business owner must provide proof of net income as identified in the Eligibility Determination section

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

2. Dividends, Interest, Royalties, Rents, Income from Estates or Trusts: Written documentation from the business or organization and/or legal entity from which the income has been generated.
3. Unemployment Benefits, Pensions, Insurance and Annuities, Worker's Compensation, Strike Benefits
 - i. Documentation must be generated by the appropriate legal entity
 - ii. Statement from local Unemployment Compensation office
 - iii. If taxes are not withheld, Notice of Determination (Unemployment Compensation) checks or bank statements showing direct deposits of Unemployment Compensation for the previous twelve months or for the period for which benefits were received. If taxes are withheld, this income should be converted to the pretax level.
4. Net Rental Income
 - i. Net Rental Income is defined as Gross Rental Income receipts less Rental Expenses. Proof of Net Rental Income can be provided by one of the methods listed below.
 - ii. Copy of prior year tax return showing net rental income.
 - iii. Copies of any agreement or lease which specifies the client's name, effective dates, and rental amount along with copies of expenditure receipts
 - iv. If the prior year tax return or rental agreements are not available, then one of the following methods may be used to document net rental income
 - a. Copies of receipts issued to tenants along with copies of expenditure receipts
 - b. Notarized statement describing any rental agreements and including the client's name, effective dates, and all net rental income
5. Self certification: If no other method of documenting income eligibility exists, self certification is allowable, but evidence of the various attempts at proving eligibility must be contained in the client file, including a notarized statement signed by the client indicating that the client has no other proof of income.
6. All documents used to determine income eligibility must be uploaded to Hancock.

Proof of Property Ownership

- A. Client Owned/Occupied Dwelling Units
 1. A client who owns his/her own dwelling unit must provide proof of ownership and occupancy.
 2. Ownership Verification: Ownership must be verified and documented by any means available, examples include:
 - i. Photocopy of the deed or Mobile Home Title
 - ii. The deed number and page number found in the deed book
 - iii. Copy of the real estate tax bill
 - iv. Mortgage bill that includes the client's name and property address
 - v. Copy of water or sewer bill if it has been determined that the bill is sent to owners only
 - vi. Verification through the County Recorder of Deeds
 - vii. Verification through a governmentsponsored online source
- B. Rental Occupied Dwelling Units
 1. Subgrantees must establish procedures to meet the requirements in 10 CFR 440.22.
 - i. Weatherization services conducted on rental units, including units where tenants pay for their energy through their rent must primarily benefit tenants who can qualify as eligible clients.
 - ii. No undue or excessive enhancement shall occur to the value of the dwelling unit.
 - iii. Weatherization of eligible multiunit buildings needs to demonstrate in detail that the benefits of the weatherization work accrue primarily to the eligible tenants
 - iv. Rent
 - a. A client who does not own his/her own dwelling unit (that is, a client who is a tenant) must provide proof of the amount of rent he/she pays monthly.
 1. Clients must prove their monthly rent by providing subgrantees with at least one of the following:
 - i. Canceled rent checks that clearly indicate the checks are for monthly rent;
 - ii. A lease that clearly indicates the amount of monthly rent;
 - iii. If neither canceled checks nor a lease are available, a notarized statement signed by the renter and landlord indicating the amount of rent the client pays monthly. In this case (when neither canceled checks nor a lease is available), the statement may be included with the Landlord/Tenant Agreement (see "Landlord/Tenant Agreement" below).
 2. Tenants who refuse to provide this information must be deferred.
 3. The Client's File must contain the amount and proof of monthly rent.
 4. Subgrantees must investigate any client whose monthly rent is less than \$250 to ensure that weatherization services conducted on the rental unit primarily benefit the eligible client.
 - i. Subgrantees may not provide weatherization services within a dwelling unit if the weatherization services would not primarily benefit the eligible client.
 - ii. Subgrantees must thoroughly document in the Client File their investigation and rationale for deciding whether to provide weatherization services within such a dwelling unit.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- iii. A subgrantee's investigation may be as simple as documenting that the client is participating in a government subsidized housing program (for example, Section 8) or that the client pays all utilities and property tax, but no rental fees. Regardless, the Client File must clearly indicate and explain the subgrantee's rationale for determining that weatherization services primarily benefit the eligible client.
 - v. Owner Permission: Subgrantees must obtain written permission from the unit's owner or authorized agent with ownership proof before conducting weatherization services.
 - vi. Landlord/Tenant Agreement: A notarized agreement must be signed by both the owner/agency and tenant to ensure that:
 - a. The client is current with all rent due to the landlord; and
 - b. During the weatherization process and for 18 months after weatherization is complete, the tenant(s) will not be subject to rent increases or eviction unless it can be demonstrated that such rent increases or eviction is related to matters other than the weatherization work performed.
 - c. There is a process for tenants and landlords to follow if rent or eviction issues arise due to weatherization assistance.
 - vii. The Landlord/Tenant Agreement may include a provision for the sale of a property, below is some sample language:
 - a. Landlord cannot sell the property for 18 months after weatherization is complete (unless there is repayment of the DOE investment and/or the new owner assumes and agrees to abide by the terms of the WAP restrictions/requirements) nor can they determine an alternate purpose for the property (e.g., no longer participate in affordable housing programs).
- C. Buildings Containing Multiple Rental Dwelling Units**
- 1. For determining eligibility, Multifamily Buildings are defined as those containing 5 or more units or certain buildings with 2 to 4 units with shared heating systems and/or common areas to include shared attic and/or basements
 - 2. The entire building may be weatherized if at least 66% (50% for duplexes and fourunit buildings) of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days.
 - 3. When appropriate PA will implement the HUD/DOE eligibility certification process described in WPN 17-4.
 - 4. Weatherization services must primarily benefit tenants who can qualify as eligible clients.
 - 5. Weatherization services may not be performed on buildings in which the weatherization services would not primarily benefit eligible clients.
 - 6. Subgrantees who provide weatherization services which would not primarily benefit an eligible client may be responsible for reimbursing disallowable costs.
- D. Documentation of Eligibility of Rental Dwelling Units**
- A. Subgrantees must document all aspects of Rental Dwelling Unit eligibility in the Client File.**
- 1. Landlord Information: the name, address, and phone number of a client's landlord must be documented in Hancock in the "Landlord Information" section of the "Client Information" tab.
 - 2. Buildings Containing Multiple Dwelling Units
 - i. Subgrantees must ensure that all street addresses of buildings containing multiple dwelling units are typed and spelled consistently within Hancock. For example, "1234 Main St" should be consistently entered into Hancock as "1234 Main St" not as "1234 Main St." or "1234 Main Street."
 - ii. For buildings containing five or fewer weatherized dwelling units, each dwelling unit's Hancock "job" must reference all other weatherized dwelling units in the building.
 - a. References to other dwelling units must include: the name of the client within the dwelling unit, the job number, the exact address, and the unit number.
 - b. These references to other dwelling units should be entered in the "Comments" section of the "Client Information" tab in Hancock.

Client Appeals & Complaints Process for Client Owned and Rental Properties

- A. The Client Appeals Process must indicate that it was given to the client at the time of application and must have a client signoff.
- B. Every client, regardless of whether the client has been deferred or not, must receive a copy of the Client Appeals Process, and the signoff must indicate that the client has received and understands the Client Appeals Process.
- C. The Client Appeals Process must present a clear order in which the client may appeal any weatherization services based decision or action with which the client disagrees.
- D. Except for the Center for Community Services' contact, the Client Appeals Process must contain the name, mailing address, phone number, and email address of all individuals or offices listed.
- E. The Client Appeals Process must detail that the Center for Community Services may only be contacted in writing and must include the office and the address by which that office should be contacted. The client appeal submission to the Center for Community Services must include details regarding the agency's involvement and responses to the client appeal. The Client Appeals Process must not include the phone number or email address of the Center for Community Services staff.
- F. Client Complaint Process
 - i. Agency is responsible for developing a Client Complaint process to be followed if client is not happy with the quality of the work, workmanship, or serviceability. This process may be included as part of the Client Appeals Process if it is clear that client understands that they can not only appeal a decision but also file a complaint about the work, workmanship and/or serviceability.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- ii. The Client Complaint Process must indicate that it was given to the client at the time of application and must have a client signoff.
- iii. Every client, regardless of whether the client has been deferred or not, must receive a copy of the Client Complaint Process, and the signoff must indicate that the client has received and understands the Client Complaint Process.
- iv. Although all client complaints must be documented in the individual file, client complaints must also be tracked by date to resolution in an Excel tracking system or one in which all complaints can be reviewed in one place.

Proof of Identity

A. Verification of Identity

- 1. Subgrantees must use Photo ID to verify the identity of all clients. Acceptable Photo ID types include (but not limited to):

- i. Drivers Licenses or other state photo identity cards issued by the PA Department of Motor Vehicles (or equivalent)
 - ii. U.S. passport
 - iii. U.S. passport card
 - iv. U.S. Military ID (active duty or retired military and their dependents, and Department of Defense civilians)
 - v. Permanent Resident Card
 - vi. A Native American Tribal Photo ID
- 2. If no Photo ID is available, there must be documentation supporting the client's reason for no ID and client must sign selfdeclaration.
 - 3. Subgrantees must verify that the client's Photo ID matches both the client and the client's name on the application for weatherization.
 - i. Photo ID verification must occur at the time of the audit.
 - ii. Clients must be physically present during the audit.
 - 4. Documentation of Photo ID
 - i. Subgrantees must document in the Client File the Photo ID type and number on the client's Photo ID.
 - ii. Subgrantees must document in the Client File that the Photo ID matches both the client and the client's name on the application.
 - iii. Clients who are unable to verify their identity through an acceptable Photo ID must self declare their identity with a signed statement. No weatherization services may occur at a home until an eligible client provides adequate and matching Photo ID or a signed statement explaining that the client does not have Photo ID but that the client is the one who applied for the weatherization services and are a resident of the home.

B. Social Security Number

- 1. Because of their confidential nature, subgrantees must make every effort to protect the security of all collected Social Security numbers.
- 2. Subgrantees will not enter Social Security Numbers (SSN) in the system under any circumstances. Subgrantees will review all documents for SSN and redact any SSN before uploading into the Hancock Software system.

Describe what household eligibility basis will be used in the Program

Eligibility Determination

A. A dwelling unit is eligible for weatherization services only if:

- 1. A person living within the dwelling unit, regardless of age, has received cash assistance payments under Title IV or XVI of the Social Security Act at any time during the 12month period preceding the Eligibility Determination for weatherization assistance (see Section A. ii, "Eligibility by Title IV or XVI of the Social Security Act"); or
- 2. The total annual income of all occupants living together within the dwelling unit is at or below 200 percent of the Federal Poverty Income Guidelines (FPIGs) as established by the US Department of Health and Human Services Office of Management and Budget for the 12month period preceding the Eligibility Determination.
 - i. The FPIGs are generally updated once a year at the beginning of the calendar year.
 - ii. The current version can be found at: <https://aspe.hhs.gov/poverty-guidelines>
 - iii. Subgrantees are responsible for updating the FPIGs they have on record as often as they are updated on the website of the U.S. Department of Health and Human Services.
 - iv. Income Eligibility is calculated using income of the prior 12 months for all occupants residing in the dwelling unit. W2's should be used to obtain the income information along with any other documentation needed to record the entire income during the period examined. When reviewing a W2, the Earnings Summary should also be reviewed to confirm the gross earned income amount before any elective deferrals.
 - v. Regardless of when a person begins occupying a client's dwelling unit, the income of all persons occupying the dwelling unit at the time of Eligibility Determination must be included for the entire previous twelve months.
- 3. Eligibility by Title IV or XVI of the Social Security Act
 - i. Title IV of the Social Security Act refers to Temporary Assistance for Needy Families (TANF) while Title XVI of the Social Security Act refers to Supplemental Security Income (SSI).

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- ii. Eligibility under TANF or SSI is automatic, regardless of the age of the recipient and income verification is not necessary, but proof of eligibility must be conducted.
 - a. Note: Social Security Disability Insurance (SSDI) is covered under Title II of the Social Security Act and is not addressed in 10 CFR 400 or DOE guidance; therefore, SSDI payments are included as income.

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

A. All applicants are U.S. Citizens or Lawfully Admitted Non-Citizen

- i. PA WAP will abide by section 431 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) – H.R.3734 passed by the 104th Congress, commonly known as the welfare reform law. The act covers larger groups of lawfully admitted non-citizens.
- ii. Lawfully admitted non-citizens are eligible to receive assistance and services under the WAP and LIHEAP programs so long as they meet all other WAP and LIHEAP requirements. Proof of identity is required.
- iii. Subgrantees should refer to H.R. 3734 for guidance on lawfully admitted non-citizens at this link: [H.R.3734 - 104th Congress \(1995-1996\): Personal Responsibility and Work Opportunity Reconciliation Act of 1996 | Congress.gov | Library of Congress](#) and the DCED Directive, Eligibility, Client Prioritization and Weatherization Service List.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Procedures to determine that units weatherized have eligibility documentation

Eligibility of Property Structures for Weatherization Services

- A. A manufactured/mobile dwelling unit or a single family (up to and including 2 to 4 unit buildings with separate heating systems and no common areas) is eligible for weatherization services if all of the following conditions are met
 - 1. The Property must be the primary residence of the client(s)
 - 2. All residents must provide proof of income as defined above in Section Client Income Eligibility.
 - 3. The entire building may be weatherized if at least 50% for duplexes and fourunit buildings of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days.
 - 4. The manufactured/mobile dwelling unit must be considered permanent. Permanent foundation means a foundation constructed in accordance with the prescriptive provisions of the adopted building code or, when required, designed by a licensed professional engineer. A permanent foundation shall have attachment points to anchor and stabilize the home to transfer all code required loads to the underlying soil or rock.
- B. Buildings Containing Multiple Dwelling Units
 - 1. Multifamily Buildings are defined as those containing 5 or more units or buildings with 2 to 4 units with shared heating systems and/or common areas to include shared attic or basements
 - 2. The entire building may be weatherized if at least 66% of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days
 - 3. When appropriate PA will implement the HUD/DOE eligibility certification process described in WPN 17-4
 - 4. Weatherization services must primarily benefit tenants who can qualify as eligible clients.
 - 5. Weatherization services may not be performed on buildings in which the weatherization services would not primarily benefit eligible clients.
 - 6. Subgrantees that provide weatherization services which would not primarily benefit an eligible client may be responsible for reimbursing disallowable costs.
- C. Weatherizing of nontraditional type dwellings such as shelters and apartments over businesses will be reviewed on a case by case basis. Please submit request to the DCED main mailbox at rawxmail@pa.gov.
- D. Multifamily units will be reviewed on a case by case basis as well.
 - 1. Please refer to WPN 16-5 Multifamily Weatherization and the FAQs for the definition of multifamily housing. Multifamily is defined as those

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

containing 5 or more units or buildings with 2 to 4 units with shared heating systems and/or common areas to include shared attic or basements.

Proof of Property Ownership

A. Client Owned/Occupied Dwelling Units

1. A client who owns his/her own dwelling unit must provide proof of ownership and occupancy.
2. Ownership Verification: Ownership must be verified and documented by any means available, examples include:
 - i. Photocopy of the deed or Mobile Home Title
 - ii. The deed number and page number found in the deed book
 - iii. Copy of the real estate tax bill
 - iv. Mortgage bill that includes the client's name and property address
 - v. Copy of water or sewer bill if it has been determined that the bill is sent to owners only
 - vi. Verification through the County Recorder of Deeds
 - vii. Verification through a government sponsored online source

B. Rental Occupied Dwelling Units

1. Subgrantees must establish procedures to meet the requirements in 10 CFR 440.22.
 - i. Weatherization services conducted on rental units, including units where tenants pay for their energy through their rent must primarily benefit tenants who can qualify as eligible clients.
 - ii. No undue or excessive enhancement shall occur to the value of the dwelling unit.
 - iii. Weatherization of eligible multi unit buildings needs to demonstrate in detail that the benefits of the weatherization work accrue primarily to the eligible tenants
 - iv. Rent
 - a. A client who does not own his/her own dwelling unit (that is, a client who is a tenant) must provide proof of the amount of rent he/she pays monthly.
 1. Clients must prove their monthly rent by providing subgrantees with at least one of the following:
 - i. Canceled rent checks that clearly indicate the checks are for monthly rent;
 - ii. A lease that clearly indicates the amount of monthly rent;
 - iii. If neither canceled checks nor a lease are available, a notarized statement signed by the renter and landlord indicating the amount of rent the client pays monthly. In this case (when neither canceled checks nor a lease is available), the statement may be included with the Landlord/Tenant Agreement (see "Landlord/Tenant Agreement" below).
 2. Tenants who refuse to provide this information must be deferred.
 3. The Client's File must contain the amount and proof of monthly rent.
 4. Subgrantees must investigate any client whose monthly rent is less than \$250 to ensure that weatherization services conducted on the rental unit primarily benefit the eligible client.
 - i. Subgrantees may not provide weatherization services within a dwelling unit if the weatherization services would not primarily benefit the eligible client.
 - ii. Subgrantees must thoroughly document in the Client File their investigation and rationale for deciding whether to provide weatherization services within such a dwelling unit.
 - iii. A subgrantee's investigation may be as simple as documenting that the client is participating in a government subsidized housing program (for example, Section 8) or that the client pays all utilities and property tax, but no rental fees. Regardless, the Client File must clearly indicate and explain the subgrantee's rationale for determining that weatherization services primarily benefit the eligible client.
 - v. Owner Permission: Subgrantees must obtain written permission from the unit's owner or authorized agent with ownership proof before conducting weatherization services.
 - vi. Landlord/Tenant Agreement: A notarized agreement must be signed by both the owner/agent and tenant to ensure that:
 - a. The client is current with all rent due to the landlord; and
 - b. During the weatherization process and for 18 months after weatherization is complete, the tenant(s) will not be subject to rent increases or eviction unless it can be demonstrated that such rent increases or eviction is related to matters other than the weatherization work performed.

C. Buildings Containing Multiple Rental Dwelling Units

1. For determining eligibility, Multifamily Buildings are defined as those containing 5 or more units or certain buildings with 2 to 4 units with shared heating systems and/or common areas to include shared basements and/or attics
2. The entire building may be weatherized if at least 66% (50% for duplexes and four unit buildings) of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days.
3. When appropriate PA will implement the HUD/DOE eligibility certification process described in WPN 17-4
4. Weatherization services must primarily benefit tenants who can qualify as eligible clients.
5. Weatherization services may not be performed on buildings in which the weatherization services would not primarily benefit eligible clients.
6. Subgrantees who provide weatherization services which would not primarily benefit an eligible client may be responsible for reimbursing

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

disallowable cost

D. Documentation of Eligibility Rental Dwelling Units

A. Subgrantees must document all aspects of Rental Dwelling Unit eligibility in the Client File.

1. Landlord Information: the name, address, and phone number of a client's landlord must be documented in Hancock in the "Landlord Information" section of the "Client Information" tab.
2. Buildings Containing Multiple Dwelling Units
 - i. Subgrantees must ensure that all street addresses of buildings containing multiple dwelling units are typed and spelled consistently within Hancock. For example, "1234 Main St" should be consistently entered into Hancock as "1234 Main St" not as "1234 Main St." or "1234 Main Street."
 - ii. For buildings containing five or fewer weatherized dwelling units, each dwelling unit's Hancock "job" must reference all other weatherized dwelling units in the building.
 - a. References to other dwelling units must include: the name of the client within the dwelling unit, the job number, the exact address, and the unit number.
 - b. These references to other dwelling units should be entered in the "Comments" section of the "Client Information" tab in Hancock.

Describe Reweathering compliance

Weatherizing Previously Weatherized Units

A. Eligibility of Previously Weatherized Dwelling Units is prohibited, except:

- If a previously weatherized dwelling unit has been damaged by fire, flood, or act of God, the event is declared a Federal or State disaster, and repair of the damage to weatherization materials is not paid with insurance, then reweatherization is allowable.
 - i. DCED may provide specific instructions in these cases.
 - ii. When applicable, subgrantees must follow the Department of Energy guidance found in WPN 12-7.
 - iii. Subgrantees must thoroughly document in the Client File their rationale for providing reweatherization to the client.
- Section 1011(h) of the Energy Act of 2020, has amended 42 U.S. Code § 6865(c)(2) and remove the reweatherization date, September 30, 1994, and created a "rolling" option.
 - i. Dwelling units weatherized (including dwelling units partially weatherized) under this part, or under other Federal programs (in this paragraph referred to as 'previous weatherization'), may not receive further financial assistance for weatherization under this part until the date that is 15 years after the date such previous weatherization was completed. This paragraph does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under this part or under other Federal programs, or from receiving non-Federal assistance for weatherization.
 - ii. The inclusion of "other Federal programs" includes all Federal funds including LIHEAP, HUD, or USDA "weatherization" activities.
- Such dwelling units must be reported separately as reweatherized units, but may be counted as completions.

B. Such dwelling units must receive a new energy audit that takes into account any previous energy conservation improvements to the dwelling unit.

Describe what structures are eligible for weatherization

PA WAP includes the following structures:

- OwnerOccupied Single Family
- Single Family Rental, Site Built
- 2 to 4 unit buildings, with or without shared heating systems and common areas including attics and basements
- MultiFamily more than 5 units
- OwnerOccupied Manufactured Housing
- RenterOccupied Manufactured Housing
- Row Homes
- Shelters
 - Caution is exercised when dealing with nontraditional type dwelling units such as shelters, apartments over businesses, etc.

Eligibility of Property Structures for Weatherization Services

- A. A manufactured/mobile dwelling unit or a single family (up to and including 2 to 4 unit buildings with separate heating systems and no common areas) is eligible for weatherization services if all of the following conditions are met**

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

1. The Property must be the primary residence of the client(s)
 2. All residents must provide proof of income as defined above in Section Client Income Eligibility.
 3. The entire building may be weatherized if at least 50% for duplexes and fourunit buildings of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days.
 4. The manufactured/mobile dwelling unit must be considered permanent. Permanent foundation means a foundation constructed in accordance with the prescriptive provisions of the adopted building code or, when required, designed by a licensed professional engineer. A permanent foundation shall have attachment points to anchor and stabilize the home to transfer all code required loads to the underlying soil or rock.
- B. Buildings Containing Multiple Dwelling Units
1. Multifamily Buildings are defined as those containing 5 or more units or buildings with 2 to 4 units with shared heating systems and/or common areas to include shared attic or basements
 2. The entire building may be weatherized if at least 66% of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days
 3. When appropriate PA will implement the HUD/DOE eligibility certification process described in WPN 17-4
 4. Weatherization services must primarily benefit tenants who can qualify as eligible clients
 5. Weatherization services may not be performed on buildings in which the weatherization services would not primarily benefit eligible clients.
 6. Subgrantees that provide weatherization services which would not primarily benefit an eligible client may be responsible for reimbursing disallowable costs.
- C. Weatherizing of nontraditional type dwellings such as shelters and apartments over businesses will be reviewed on a casebycase basis. Please submit request to the DCED main mailbox at rawxmail@pa.gov.
- D. Multifamily units will be reviewed on a casebycase basis as well.
1. Please refer to WPN 16-5 Multifamily Weatherization and the FAQs for the definition of multifamily housing. Multifamily is defined as those containing 5 or more units or buildings with 2 to 4 units with shared heating systems and/or common areas to include shared attic or basements.

WHEN NOT TO WEATHERIZE If any of the following conditions are true for a property at the time of client application or anytime during the weatherization period then the property is not eligible for weatherization services until the condition is resolved. NOTE: If a dwelling unit falls within any of these categories during the weatherization process, all measures started must be completed; however, no new measures will be permitted. The job will be considered deferred. For subgrantees recording of charges, documentation must be kept in the client file to explain the details. When deciding not to weatherize, the agency must follow deferral process as defined in the Health & Safety Plan.

1. The property is owned by a bank or other financial entity due to foreclosure
2. The property is currently in foreclosure proceedings
3. The property is currently for sale or for rent and is unoccupied or the client is moving
4. The property is listed for sale or rent to the general public
5. The property is scheduled for a sheriff sale
6. The structure is condemned or otherwise deemed uninhabitable by federal, state or local authorities.
7. The structure is not secured to a permanent foundation and connected to utilities.
8. The structure is a camper, recreational vehicle, boat, railroad car, bus or other structure which does not have a mailing address and is designed and constructed as temporary, nonstationary, living quarters.
9. A service provider may choose not to weatherize a property under the following conditions:
 - i. There are vermin, unsanitary conditions, or other health and safety problems on the property that present a hazard to the weatherization workers

Compliance with National Historic Preservation Act

A simplified process has been created specifically for the PA Weatherization Program to ensure compliance with the federal law, Section 106 of the National Historic Preservation Act of 1966, as amended. Through the Department's work with the PA State Historical Preservation Office (SHPO), it has been determined that in most instances, weatherization efforts are limited to a narrow list of project activities which have little or no potential to adversely affect historic or archaeological resources. Consequently, a list of NO EFFECT ACTIVITIES has been created which, when followed, will not require individual consultation for weatherization projects.

Although most weatherization projects will have little or no chance to adversely affect historic or archaeological resources and will not require individual review by the SHPO office, certain weatherization activities trigger the need to submit project information to the SHPO office. The following activities, when performed on homes over 50 years old, require consultation:

1. Changes to the exterior appearance of a building
 - i. Such as the closing in of windows, doors or porches, removal or covering of decorative trim, covering of wall surfaces with new and different materials, and altering or removal of chimneys. Anytime the completed building will look different from its appearance prior to

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

weatherization treatments, consultation is required.

2. Replacement of original, nonplacement windows/doors on facades visible from the street with new modern material (vinyl or aluminum) windows or metal doors.
3. Replacement of any window or door with a new window or door of a different size, shape or placement from the original*

*Except for ground level basement or cellar windows

Pennsylvania SHPO Agreement can be found at: <https://www.energy.gov/eere/wipo/historic-preservation-executed-programmatic-agreements>

Describe how Rental Units/Multifamily Buildings will be addressed

A. Subgrantees must establish procedures to meet the requirements in 10 CFR 440.22.

i. Weatherization services conducted on rental units, including units where tenants pay for their energy through their rent must primarily benefit tenants who can qualify as eligible clients.

ii. No undue or excessive enhancement shall occur to the value of the dwelling unit.

iii. Weatherization of eligible multiunit

buildings needs to demonstrate in detail that the benefits of the weatherization work accrue primarily

to the eligible tenants

iv. Rent

a. A client who does not own his/her own dwelling unit (that is, a client who is a tenant) must provide proof of the amount of rent he/she pays monthly.

b. Clients must prove their monthly rent by providing subgrantees with at least one of the following:

i. Canceled rent checks that clearly indicate the checks are for monthly rent;

ii. A lease that clearly indicates the amount of monthly rent;

iii. If neither canceled checks nor a lease are available, a notarized statement signed by the renter and landlord indicating the amount of rent the client pays monthly. In this case (when neither canceled checks nor a lease is available), the statement may be included with the Landlord/Tenant Agreement (see "Landlord/Tenant Agreement" below).

c. Tenants who refuse to provide this information must be deferred.

d. The Client's File must contain the amount and proof of monthly rent.

e. Subgrantees must investigate any client whose monthly rent is less than \$250 to ensure that weatherization services conducted on the rental unit primarily benefit the eligible client.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- i. Subgrantees may not provide weatherization services within a dwelling unit if the weatherization services would not primarily benefit the eligible client.
- ii. Subgrantees must thoroughly document in the Client File their investigation and rationale for deciding whether to provide weatherization services within such a dwelling unit.
- iii. A subgrantee's investigation may be as simple as documenting that the client is participating in a government subsidized housing program (for example, Section 8) or that the client pays all utilities and property tax, but no rental fees. Regardless, the Client File must clearly indicate and explain the subgrantee's rationale for determining that weatherization services primarily benefit the eligible client.
- v. Owner Permission: Subgrantees must obtain written permission from the unit's owner or authorized agent with ownership proof before conducting weatherization services.
- vi. Landlord/Tenant Agreement: A notarized agreement must be signed by both the owner/agent and tenant to ensure that:
 - a. The client is current with all rent due to the landlord; and
 - b. During the weatherization process and for 18 months after weatherization is complete, the tenant(s) will not be subject to rent increases or eviction unless it can be demonstrated that such rent increases or eviction is related to matters other than the weatherization work performed.

B. Buildings Containing Multiple Rental Dwelling Units

- 1. For determining eligibility, Multifamily Buildings are defined as those containing 5 or more units or buildings with 2 to 4 units with shared heating systems and/or common areas
- 2. The entire building may be weatherized if at least 66% (50% for duplexes and fourunit buildings) of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days.
- 3. When appropriate PA will implement the HUD/DOE eligibility certification process described in WPN 17-4
- 4. Weatherization services must primarily benefit tenants who can qualify as eligible clients.
- 5. Weatherization services may not be performed on buildings in which the weatherization services would not primarily benefit eligible clients.
- 6. Subgrantees who provide weatherization services which would not primarily benefit an eligible client may be responsible for reimbursing disallowable costs.

C. Documentation of Eligibility of Rental Dwelling Units

A. Subgrantees must document all aspects of Rental Dwelling Unit eligibility in the Client File.

- 1. Landlord Information: the name, address, and phone number of a client's landlord must be documented in Hancock in the "Landlord Information" section of the "Client Information" tab.
- 2. Buildings Containing Multiple Dwelling Units
 - i. Subgrantees must ensure that all street addresses of buildings containing multiple dwelling units are typed and spelled consistently within Hancock. For example, "1234 Main St" should be consistently entered into Hancock as "1234 Main St" not as "1234 Main St." or "1234 Main Street."
 - ii. For buildings containing five or fewer weatherized dwelling units, each dwelling unit's Hancock "job" must reference all other weatherized dwelling units in the building.
 - a. References to other dwelling units must include: the name of the client within the dwelling unit, the job number, the exact address, and the unit number.
 - b. These references to other dwelling units should be entered in the "Comments" section of the "Client Information" tab in Hancock.

Client Appeals & Complaints Process for ClientOwned and Rental Properties

- A. The Client Appeals Process must indicate that it was given to the client at the time of application and must have a client signoff.
- B. Every client, regardless of whether the client has been deferred or not, must receive a copy of the Client Appeals Process, and the signoff must indicate that the client has received and understands the Client Appeals Process.
- C. The Client Appeals Process must present a clear order in which the client may appeal any weatherization servicesbased decision or action with which the client disagrees.
- D. Except for the Center for Community Services' contact, the Client Appeals Process must contain the name, mailing address, phone number, and email address of all individuals or offices listed.
- E. The Client Appeals Process must detail that the Center for Community Services may only be contacted in writing and must include the office and the address by which that office should be contacted. The client appeal submission to the Center for Community Services must include details regarding the agency's involvement and responses to the client appeal. The Client Appeals Process must not include the phone number or email address of the Center

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

for Community Services staff.

F. Client Complaint Process

- a. Agency is responsible for developing a Client Complaint process to be followed if client is not happy with the quality of the work, workmanship, or serviceability. This process may be included with the Client Appeals Process if it is clear that client understands that they can not only appeal a decision but also file a complaint about the work, workmanship and/or serviceability.
- b. The Client Complaint Process must indicate that it was given to the client at the time of application and must have a client signoff.
- c. Every client, regardless of whether the client has been deferred or not, must receive a copy of the Client Complaint Process, and the signoff must indicate that the client has received and understands the Client Complaint Process.
- d. Although all client complaints must be documented in the individual file, client complaints must also be tracked by date to resolution in an Excel tracking system or one in which all complaints can be reviewed in one place.

Eligibility of Property Structures for Weatherization Services

- A. A manufactured/mobile dwelling unit or a single family (up to and including 2 to 4 unit buildings with separate heating systems and no common areas) is eligible for weatherization services if all of the following conditions are met
 1. The Property must be the primary residence of the client(s)
 2. All residents must provide proof of income as defined above in Section Client Income Eligibility.
 3. The entire building may be weatherized if at least 50% for duplexes and fourunit buildings of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days.
 4. The manufactured/mobile dwelling unit must be considered permanent. Permanent foundation means a foundation constructed in accordance with the prescriptive provisions of the adopted building code or, when required, designed by a licensed professional engineer. A permanent foundation shall have attachment points to anchor and stabilize the home to transfer all code required loads to the underlying soil or rock.
- B. Buildings Containing Multiple Dwelling Units
 1. Multifamily Buildings are defined as those containing 5 or more units or buildings with 2 to 4 units with shared heating systems and/or common areas to include shared attic or basements
 2. The entire building may be weatherized if at least 66% of the dwelling units in the building are eligible or will become eligible dwelling units within 180 days
 3. When appropriate PA will implement the HUD/DOE eligibility certification process described in WPN 17-4
 4. Weatherization services must primarily benefit tenants who can qualify as eligible clients.
 5. Weatherization services may not be performed on buildings in which the weatherization services would not primarily benefit eligible clients.
 6. Subgrantees that provide weatherization services which would not primarily benefit an eligible client may be responsible for reimbursing disallowable costs.
- C. Weatherizing of nontraditional type dwellings such as shelters and apartments over businesses will be reviewed on a casebycase basis. Please submit request to the DCED main mailbox at rawxmail@pa.gov.
- D. Multifamily units will be reviewed on a case by case basis as well.
 1. Please refer to WPN 16-5 Multifamily Weatherization and the FAQs for the definition of multifamily housing. Multifamily is defined as those containing 5 or more units or buildings with 2 to 4 units with shared heating systems and/or common areas to include shared attic or basements.

Describe the deferral Process

WHEN NOT TO WEATHERIZE If any of the following conditions are true for a property at the time of client application or anytime during the weatherization period then the property is not eligible for weatherization services until the condition is resolved. NOTE: If a dwelling unit falls within any of these categories during the weatherization process, all measures started must be completed; however, no new measures will be permitted. The job will be considered deferred. For subgrantees recording of charges, documentation must be kept in the client file to explain the details. When deciding not to weatherize, the agency must follow deferral process as defined in the Health & Safety Plan.

1. The property is owned by a bank or other financial entity due to foreclosure
2. The property is currently in foreclosure proceedings
3. The property is currently for sale or for rent and is unoccupied or the client is moving
4. The property is listed for sale or rent to the general public
5. The property is scheduled for a sheriff sale
6. The structure is condemned or otherwise deemed uninhabitable by federal, state or local authorities.
7. The structure is not secured to a permanent foundation and connected to utilities.
8. The structure is a camper, recreational vehicle, boat, railroad car, bus or other structure which does not have a mailing address and is designed and constructed as temporary, nonstationary, living quarters.
9. A service provider may choose not to weatherize a property under the following conditions:

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- | |
|---|
| <ul style="list-style-type: none">i. There are vermin, unsanitary, or other health and safety problems on the property that present a hazard to the weatherization workersii. The client or occupants are physically or verbally abusive |
|---|

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.

The Department has chosen to provide weatherization services to the low-income persons of tribal organizations via its existing network of sub grantees. Low income members of tribal organizations will receive benefits equivalent to the assistance provided to other low income persons within the state.

V.2 Selection of Areas to Be Served

PA WAP serves the entire state of Pennsylvania. There are subgrantees who are each assigned service areas, which includes all counties, cities and areas of the state.
--

- | |
|--|
| <ul style="list-style-type: none">A. As required by the Federal Register, Section 440.15, all current subgrantees have experience in dealing with, identification of, and service to, the lowincome population of their respective areas.B. All current Weatherization Program subgrantees have been presented in the plan and announced at the public hearing for public comment.C. Any future new Weatherization Program subgrantees will be selected on the basis of public hearings conducted by the Department.D. Criteria used in the selection of new subgrantees include, but are not limited to:<ul style="list-style-type: none">a. The subgrantee's experience and performance in weatherizationtype activities or housing renovation activitiesb. The grantee's experience in assisting lowincome persons in the areas to be servedc. The sub grantee's capacity to undertake a timely and effective programE. In the event that an agency chooses to stop providing weatherization services, or funding is at risk due to performance issues which cannot be resolved in a timely manner and in order to utilize the funds in the specific area they were allocated for, the Department has, and will continue, to give preference to any Community Action Agency or other public or nonprofit agency which has or is currently administering an effective program under the Weatherization Assistance Act or the Community Services Block Grant Act of 1981 in order to provide continuity of services.F. In the decision to continue any sub grantee's participation in the Weatherization Program, the Department will take into consideration the extent to which that agency achieved or is achieving weatherization goals in a timely fashion, quality of work performed, and the numbers, qualification, and experience of the subgrantee's staff members. In addition, the ability of the current subgrantees to secure volunteers, training participants, public service employment workers, and other federal/state training programs is also considered.G. Types of Subgrantees:<ul style="list-style-type: none">a. Community Action Agenciesb. City Government Agenciesc. County Government Agenciesd. Local Housing Authoritiese. Local Redevelopment Authoritiesf. Other NonProfit AgenciesH. During the current review of poverty and heating degree days data in combination with various capacity issues uncovered during the 2020 Risk Assessment process, it appears that the population needs for weatherization services combined with ongoing compliance with all program requirements has challenged the network as it is currently organized. For the upcoming new DOE grant, the Department is continuing a planning strategy in partnership with the WAP agency network and the Policy Advisory Council (PAC) to further analyze the shifting data trends as applied to individual agency capacity in order to reconsider and recreate, as necessary, a sustainable agency framework for Pennsylvania. |
|--|

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

V.3 Priorities

Client Prioritization

A. All eligible clients must be prioritized according to the Priority Points System.

1. Priority Points System
2. Except when specifically instructed by DCED, subgrantees must prioritize clients for weatherization services according to their number of priority points: those clients receiving a greater number of points must receive service prior to those clients receiving a fewer number of points.
 - i. Exceptions to the Priority Points System
 1. DCED may at times provide subgrantees with instructions to divert from the priority points system, especially for specific funding streams.
 2. For multifamily, since the Department is allocating a specific amount of funds for multifamily work, the priority requirements will be waived so that building can be addressed with the "whole building as a system" approach. At least one client/unit in the building should be classified as a "priority client" but does not have to be prioritized in the Weatherization Service List.
 3. For example: DCED may request that subgrantees utilize LIHEAP weatherization funds to weatherize only LIHEAP Crisis clients. In this case, Crisis clients would be given priority over nonCrisis clients but would still be prioritized and compared to one another according to this Priority Points System, unless otherwise directed by DCED.
 - ii. As per The Client File Directive, clients must be prioritized through Hancock Software system and the result of their prioritization must be contained within Hancock.
 - iii. The Priority Points System is guided by the Priority Points Matrix:

Category	WAP Client Priority Points
Age	v. 4 pts for households with any member under 19 years of age
	v. 4 pts for households with any member over 60 years of age
Disability	v. 5 pts for households with any member(s) who are "Persons with Disabilities", as defined in 10 CFR 440.3
	v. 15 pts for whose previous calendar year energy use of gas or electric exceeds: <ul style="list-style-type: none">• 9,000 kWh for electricity• 100 MCF of natural gas
High Use	v. 15 pts for any household who for the previous calendar year had one of the listed fuels as their primary or secondary heat source: Oil Wood Wood Pellets Propane Coal Kerosene Other
	v. 3 pts for households receiving utility leveraged funds for weatherization measures coordinated in unit
	v. 3 pts for households receiving nonutility leveraged funds for weatherization measures coordinated in unit
High Burden	v. 10 pts for households with high energy burden (households' overall energy costs are equal to or greater than 10% of a household's annual income)
	v. 20 pts for households with high energy burden (households' overall energy costs are equal to or greater than 25% of a household's annual income)
	v. 3 pts for households participating in a utility's Customer Assistance Program (CAP) or receiving a LIHEAP grant within the last 12 months

The Weatherization Service List

- A. Definition

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

1. The Weatherization Service List, which in Department of Energy terms is called the waiting list serves as the list of all individuals who meet all of the following conditions:
 - i. Have applied for weatherization services;
 - ii. Have been entered into Hancock Software System;
 - iii. Have been found to be eligible for weatherization services as defined in previous sections
 - iv. Have been prioritized for weatherization services.
 2. The Weatherization Service List should only contain clients for whom the subgrantee believes it can actually provide weatherization services with the assigned year's funding.
 3. Individuals who do not meet all of these conditions are not considered to be on the Weatherization Service List.
- B. Creating and Managing the Weatherization Service List**
1. Within the confines of creating a reasonably sized Weatherization Service List, subgrantees should engage in broad community outreach efforts to publicize their weatherization program as needed. Subgrantees are reminded that LIHEAP Crisis clients whose homes have not been weatherized yet should be added to a Request for Service list of potential WAP clients.
 2. Subgrantees must determine eligibility for weatherization services of potential clients. Clients deemed eligible may be added to the Weatherization Service List. This eligibility determination is valid for 12 months from the date of final determination.
 3. A subgrantee may not create a Weatherization Service List that contains more clients than are reasonably necessary to conduct weatherization services without running out of clients or funding.
 4. It may be necessary for subgrantees to maintain a separate list of weatherization inquiries or potentially eligible applicants to contact once their Weatherization Service List/waiting list has been depleted. This should be maintained as a Request for Service List.
 5. The Request for Service List should document the client name, phone number, address and date of inquiry

V.4 Climatic Conditions

The Weatherization Assistant (WA) energy audit software was used to model an array of measures for multiple reference structures throughout the state. Pennsylvania-specific weather, fuel costs, measure costs, and reference structures were used throughout the assessment. We used a bracketing approach, wherein the audit was conducted using lower and higher ranges of fuel costs within the warmest and coldest weather regions of the state, respectively, providing a range of measures which were known to be certainly cost-effective under all conditions (the low fuel cost/warmest region). Subsequently, we conducted additional assessments to determine under which weather regions and fuel costs (the high fuel cost/coldest region) additional measures could be found cost-effective. This involved mostly assessing the cost effectiveness of heating system replacements.

The attached map has been historically used; however, recent data updates are showing a shift in climatic conditions. These updates will be considered during the strategy meetings regarding appropriate future framework for the network to serve all areas of PA.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

Type of Work to Be Done

- A. The Weatherization Assistance Program is designed to reduce energy consumption of dwellings through the installation of energy conservation measures approved by the Department, based on their savings to investment ratio or cost-effectiveness. Additional measures are approved and selected as incidental repairs necessary for effective installation of the energy conservation measures, to correct an existing health or safety problem or to assure health and safety in conjunction with the installation of the energy conservation measures.
- B. The specific methodologies to accomplish the program measures are based, to an extent, on the condition and design of the dwelling. These methodologies are further directed on individual dwelling units through blower door guided analysis, airsealing, and inspection of the heating system.

Technical Guides and Materials

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

As indicated in energy audits procedure section below, PA has transitioned to the use of the DOE approved whole house standardized energy audit. The Home Energy Audit Tool (HEAT) developed by Hancock Software, Inc. was approved for use in PA by DOE in December 7, 2016. Since the use of HEAT expires in 2021, PA plans to transition to the use of the Weatherization Assistant Suite of auditing tools in 2023. Specifically, PA plans to use the web-based version (version 10) for Single family, the National Energy Audit Tool (NEAT) and for Manufactured Housing called the Manufactured Home Energy Audit (MHEA).

PA requested an extension from DOE and was approved to use HEAT while working on transitioning to the new web-based audit tools. In the summer of 2021, PA as directed by DOE, will submit a request to DOE for the extension of the use of HEAT to include updated fuel and material/labor costs to be used in HEAT and will indicate the time period for the needed extension. This is of course predicated upon the final availability of the WAP Assistant tool and the necessary API development for connection into the new WAP software. The hopeful date for NEAT and MHEA use is Fall 2023.

All work will be consistent with the energy audit, the NREL Standard Work Specifications (SWS), and approved 2018 Pennsylvania SWS Field Manual. In addition, all subgrantees are required to meet the PA SWS Field Manual standards, which include the approved WAP materials, as listed in Appendix A in accordance with WPN 19-4.

PA requested and received DOE approval on July 15, 2019 to use the following materials in addition to Appendix A:

- Refrigerators
- Spray Applied Foam (insulation)
- LED lamps and fixtures

Health & Safety Directive July 1, 2021

PA SWS Field Manual & WAP Standard Work Specifications August 9, 2018

An electronic copy of the most recent PA SWS Field Manual can be found at this link within the Weatherization SharePoint site, which can only be accessed by the weatherization network:

<https://collab.pa.gov/dced/weatherization>

PA plans to submit an updated version of its PA SWS Field Manual & WAP Standard Work Specifications to DOE for approval in June 2021. This updated version incorporates all the 2020 updates to the National Standard Work Specifications. Upon DOE approval, PA plans to provide training and provide a date to the WAP Network that they should transition to the updated PA SWS Field Manual.

All Weatherization work performed in PA WAP will adhere to the Standard Work Specifications (SWS) for Home Energy Upgrades for Single Family, Mobile and/or Manufactured Homes. In the event that multifamily work is performed, it will adhere to the Multifamily SWS. These SWS have been adjusted to align with PA standards in the PA SWS Field Manual. The Department will continue collecting data on any other variances and will submit those requests as required. Other requirements are provided via WAP Directives available at the WAP SharePoint Site, for which access is required for every agency.

All Weatherization work performed in PA WAP by direct hires of the PA WAP network as well as any subcontractor work adheres to the SWS's for Home Energy Upgrades for Single Family, Multifamily, Mobile and/or Manufactured Homes, and as such, will be noted in the contractual requirements between the PA WAP agencies and their subcontractors. The PA WAP agencies and their subcontractor's signatures on the contracts signifies agreement and compliance with all the requirements.

All weatherization work must adhere to the PA SWS Field Manual as well as the NREL SWS Requirements. All subgrantee contracts and their subcontracts must contain language which:

1. Ensures that all technical requirements such as audits, testing, installation, and inspections are provided and signatures are obtained from all subcontractors and direct hire staff
2. Work quality standards align with the SWS
3. Every home is inspected and complies with the SWS

PA requires a standardized whole house energy audit on every unit. In addition, the PA SWS Field Manual has been updated to include the SWS for the most common measures performed in PA and is coupled with Pennsylvania's state specific guidance regarding policy and technical program requirements. All PA WAP weatherization workers are required to use PA's SWS Field Manual on the jobsite to reference the desired outcome of specific tasks as well as to ensure the installed measures are 100% compliant with the SWS. The SWS online tool is referenced in the PA SWS Field Manual and should be

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

utilized for guidance on the SWS's that may not be addressed in the Field Manual. Webinars and trainings have been conducted and continue to be ongoing for the use of the standardized wholehouse audit and the PA SWS Field Manual. As PA transitions to a new suite of energy audit tools and the most recent updated version of the national SWSs, PA SWS Field Manual webinars and trainings will be conducted.

Full implementation of the certified Quality Control Inspections (QCI) occurred July 1, 2015. PA's Interstate Renewable Energy Council (IREC) accredited training center, Clean Energy Center, has offered both training and testing since March 2014 to qualified individuals. This center will continue to provide the Quality Control Inspection training. The requirement for monitoring of units by the Department monitors will be 5% or 65 units during program year 2021/22. The total to be monitored for 2019-2022 is 5% or 218 units. PA monitors 5% because we follow the Independent QCI rule from WPN 20-4: When the Subgrantee's QCI performs only the final quality control inspection, the Grantee must perform reviews of at least 5 percent of each Subgrantee's completed weatherized units (with DOE funds) using an independent QCI. All the Department monitors are QCI certified. The QCI certification is a requirement for all new monitors. To meet PA's needs and avoid all conflicts of interest, a QCI is an individual that has no involvement in the prior work of the home.

The Department's Monitors will be quality control inspecting and overseeing the work of the subgrantee QCIs by performing technical visits at each agency. For this year, due to travel constraints caused by the Pandemic, to ensure oversight, the technical monitoring has been conducted with a desk monitoring process. PA plans to return to the typical on-site technical monitoring as soon as the state allows a regular monitoring travel schedule. PA plans to make up the on-site monitoring quotas for all three years of funding. For jobs that have been reported in the Hancock Software System (HS) as complete and do not pass the Department's QC inspection, the Department will coordinate with the agency responsible for the work and allow them the chance to go back and correct the problem. The agency will be responsible for making sure the unit meets standard work specifications and that it will pass a final departmental inspection. If there are cases where the issue cannot be corrected or the timing is such that the corrections cannot be made within the funding release limits, the agency will be charged with disallowed costs and funds will be returned to the Department.

The opportunity to work with the agency and the Quality Control Inspector to fix the issues with DOE funds, will allow the Department to evaluate the QCI process and develop a plan for the continuing implementation of QCI process and quality failures. In addition, if specific Quality Control Inspectors are found to be performing poorly, there will be consequences based on the number of failed inspections and severity of the deficiency.

Field guide types approval dates

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

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: HEAT
Approval Date: 12/7/2016

Audit Procedure: Manufactured Housing
Audit Name: HEAT
Approval Date: 4/25/2017

Audit Procedure: Multi-Family
Audit Name: Other (specify)
Multi-Family ---- TREAT and/or Multea, Multi-Family Procedures TBD
Approval Date:

Comments

For audit determination the following definitions apply to the different types of buildings:

- 1 unit is a single-family unit
- 2 to 4 units is a separate building type but are considered single family units for auditing purposes, unless they have shared heating systems and/or

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

common areas to include shared attics and basements

- 5 units or over or certain 2 to 4 unit buildings with shared heating systems and/or common areas including shared attics or basements are multifamily units but the prescribed audit will depend on the specific building characteristics

As of February 1, 2017, Hancock Energy Audit Tool (HEAT) became the Standardized Full House Audit which must be used for all single-family unit audits conducted on or after that date.

The HEAT audit tool for manufactured/mobile homes is effective for all audits conducted on or after January 1, 2018.

PA requested an extension from DOE and was approved to use HEAT while working on transitioning to the new web-based audit tools. In the summer of 2021, PA as directed by DOE, will submit a request to DOE for the extension of the use of HEAT to include updated fuel and material/labor costs to be used in HEAT and will indicate the time period for the needed extension. This is of course predicated upon the final availability of the WAP Assistant tool and the necessary API development for connection into the new WAP software. The hopeful date for NEAT and MHEA use is Fall 2023.

HOUSING TYPE	REQUIRED AUDIT PROCEDURE (Typical structure)	EFFECTIVE DATES	DOE Approval date
Single Family			
	Hancock Energy Audit Tool (HEAT), for single family	Audits performed on or after 2/1/2017 to 12/7/2021	12/7/2016
Mobile/Manufactured Housing	Hancock Energy Audit Tool (HEAT), for mobile/manufactured housing	Audits performed on or after 1/1/2018 to 4/28/2022	4/26/2017
Multifamily	Targeted Retrofit Energy Analysis Tool (TREAT), for multifamily	May 7, 2012 to May 7, 2017	TBD
	Multi family Tool for Energy Audits (MulTEA)		TBD
TBD= To be Determined			

The audits as listed above will be utilized for all weatherization work on the effective dates. Regarding manufactured/mobile homes, they are defined as having a steel foundation frame and they are governed by Housing and Urban Development (HUD) code. HEAT for manufactured/mobile homes should be utilized. For modular homes which are defined as being factory built but constructed to meet sitebuilt single family standards, HEAT for single family should be utilized.

For Multifamily, there will be circumstances that HEAT for single family homes will be appropriate. PA plans to be approved to use the TREAT or MulTEA multifamily audit tool and also the use of HEAT for some multifamily units which have their own individual heating units such as garden apartments. The tool to use will be determined by the characteristics of the multifamily unit and based upon DOE approval. Additionally, PA plans to review a new multifamily tool this year for DOE approval.

When a multifamily project is being considered, the subgrantees must submit the necessary materials, such as engineering assessments, audit inputs/outputs, for approval of the multifamily project prior to commencing the weatherization. This information will be submitted to PA DOE's Project Officer with the TREAT or MulTEA audit for review on a case by case basis.

PA has continued to take steps during the last three years to conduct multifamily WAP. Procedures and processes continue to be in development, but PA is moving towards using a different multifamily audit tool because we have had problems with the TREAT Tool and getting additional support and training. DCED staff, Clean Energy Center training center and auditors from four agencies were trained and certified as multifamily QCI's on September 26 28, 2017. In June 2018, TREAT training was provided via online courses and webinars. In March 2019, a multifamily roundtable meeting was held to discuss common issues, setting realistic timelines, guidance, and the roles and responsibilities in the multifamily implementation process.

Over the 2019 and 2020 program years, DCED with the assistance of Clean Energy Center worked closely with two specific agencies on two multifamily projects. We submitted one of those multifamily projects to DOE for approval within the current program year.

Although that submission utilized the TREAT audit, we will be exploring the use of the MulTEA audit tool for future submissions and a possible request for DOE approval for our multifamily audit tool.

Clean Energy Center conducted a multifamily Auditor course in June 2020 in which three weatherization agencies participated. The course will be offered in 2021 upon request.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

V.5.3 Final Inspection

All weatherization work must adhere to the PA SWS Field Manual as well as the NREL SWS Requirements. All subgrantee contracts and their subcontracts must contain language which:

1. Ensures that all technical requirements such as audits, testing, installation, and inspections are provided and signatures obtained from all subcontractors and direct hire staff
2. Work quality standards align with the SWS
3. Every home is inspected and complies with the SWS

Quality Control Inspections are required for all units. PA's IREC accredited training center, Clean Energy Center, has offered both training and testing since March 2014 to qualified individuals. Since PA has opened up training and testing to the PA WAP subgrantee network, the requirement for monitoring of units by the Department monitors will be 5% or 65 units during program year 2021/2022. The total to be monitored for 2019-2022 is 5% or 218 units. PA monitors 5% because we follow the Independent QCI rule from WPN 20-4: When the Subgrantee's QCI performs only the final quality control inspection, the Grantee must perform reviews of at least 5 percent of each Subgrantee's completed weatherized units (with DOE funds) using an independent QCI. All Department monitors are QCI certified. The QCI certification is a requirement for all new monitors. To meet PA's needs and avoid all conflicts of interest, a QCI is an individual that has no involvement in the prior work of the home.

A Quality Control Inspector will inspect the completed work. Completion verification from the client will be obtained during an inspection process and this verification will become part of the permanent client file record and will indicate the client's satisfaction with the work performed. Also included is verification that the installed measures were explained to the occupant and that client education was provided.

In accordance with federal regulations 10 CFR 440.16 (g), the Department requires all subgrantees to ensure that each unit submitted as completed to DOE is inspected and certified as to the quality of work performed. The requisite signatures, that of the client and an agency representative, are to verify that the work was completed in accordance with an approved audit, that it was done in a professional manner, and that the client was aware of the work performed on the unit and was satisfied.

The Department's Quality Control Inspectors will be inspecting and overseeing the work of the subgrantee QCIs by performing technical visits at each agency. For this year, due to travel constraints caused by the Pandemic, to ensure oversight, the technical monitoring has been conducted with a desk monitoring process. PA plans to return to the typical on-site technical monitoring as soon as the state allows a regular monitoring travel schedule. PA plans to make up the onsite monitoring quotas for all three years of funding. Jobs that have been reported in Hancock as complete and do not pass the Department's QC inspection, the Department will coordinate with the agency responsible for the work and allow them the chance to go back and correct the problem. The agency will be responsible for making sure the unit meets standard work specifications and that it will pass a final departmental inspection. If there are cases where the issue cannot be corrected, or the timing is such that the corrections cannot be made within the funding release limits, the agency will be charged with disallowed costs and funds will be returned to the Department.

The opportunity to work with the agency and the Quality Control Inspector to fix the issues with DOE funds, will allow the Department to evaluate the QCI process and develop a plan for the continuing implementation of QCI process and quality failures. In addition, if specific Quality Control Inspectors are found to be performing poorly or not adhering to the most recent version of the PA SWS Field Manual, there will be consequences based on the number of failed inspections and severity of the deficiency.

V.6 Weatherization Analysis of Effectiveness

Performance begins with compliance and the focus on categories of quality weatherization production, required reporting, and adherence to the approved DOE state plan.

In addition, program monitoring will continue to be done and WAP Risk Assessments completed. A risk level will be assigned for each agency. These performance documents are distributed each year to the Weatherization agencies via the DOE State Plan and with each assessment notification. When the monitoring, quality control inspections, and reviews are completed of each agency, they will be notified in writing of their Risk Level and the problem areas identified during the assessment. Agencies will then submit corrective action plans and may be required to attend meetings to discuss further action or attend trainings which will focus on agency issues. The Department will strategically monitor the agencies as related to the assessments of risk, their

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

performance, and the agency's adherence to the completion of their corrective action plans. At any time throughout the program year, new findings can be applied which will raise risk levels, as appropriate. We also base the monitoring and follow up on the type and significance of the deficiencies. In some cases, we require weekly reports, schedule meetings, and would schedule more frequent visits depending on the type of finding. Assessing the risk of the agencies' performance on an ongoing basis promotes better planning and the ability to provide focused guidance and assistance as well as make well informed funding decisions.

As per DOE WPN 20-4 requirements, DCED will notify DOE of waste, fraud, and abuse. Fraud and abuse will constitute the basis of immediate cessation of work and, if appropriate, law enforcement actions.

Risk Assessment Plan

- Agencies are visited at least one time a year for a technical visit. At this visit, QCI Monitoring inspections will be conducted and the Quality Control Checklists reviewed by Department QC Inspectors.
- Agencies will be responsible for reporting units which have been completed and QC inspected no less than weekly. The monitors will schedule visits based on Hancock Software system reports.
- Risk Assessments using the Tool will be conducted at least annually.
- Meetings are held with Center management staff to discuss the annual review of each agency. Pertinent information about each agency is shared and a plan is developed to address any issues and compare best practices to distribute.

Points System

- There are 24 different descriptors/criteria that are measured that fall within the categories of Management/Financial Reporting, Production, Contract Compliance, Inventory, and Quality Control Inspections and Monitoring Results
- Each descriptor is worth a certain amount of points based on the importance of the descriptor/criteria.
- Each agency will start with a score of 100 points and points are subtracted for areas of non-compliance found within each descriptor.
- QCI Inspections will be assessed based on QCI Reports issued.
- For In Progress work that is reviewed by DCED QC Inspectors, if there are any issues or problems which need to be corrected, the agency will lose at least 1 point.
- If there is a DCED QC Inspection completed and all the work cannot be brought into SWS compliance, the agency will lose 14 points/the maximum points for the QCI criteria.
- The number of callbacks as well as the number and severity of the issues found during QCIs will be reviewed when determining risk as follows:
 - For completed work, if a callback is required after the agency QCI, the agency may lose point/s based on the severity of the issues requiring the callback/s
 - For completed work, if a callback is required after a DCED QCI, the agency will lose 10 points
- Low Risk an agency will have a combined total score of 90+ points
- Medium Risk an agency will have a score that falls at or between 70-89 points
- High Risk an agency will have a score of 0-69 points

Due Process for NonCompliance

Risk Levels

- A. Corrective Action Plans (CAP) will be required for all Levels within 15 business days of receipt of their Risk Assessment. Unless otherwise stated and viable reasons provided, all corrective actions should have resolution date of no more than 90 business days after CAP submission.
- B. If an agency reaches Medium Risk:
 - i. A meeting or call will be scheduled with them to discuss the issues
 - ii. Onsite training will be required, if applicable
 - iii. In-progress or more frequent QCIs may be completed may be completed, if applicable
 - iv. Funding may be affected if production is an issue
- C. If an agency reaches High Risk:

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- i. A meeting will be scheduled with them to discuss the issues
- ii. Onsite training will be required, if applicable
- iii. In-progress QCIs or more frequent QCIs must be completed, if QCI issues have been identified
- iv. Funding will be reconsidered quarterly
- v. The possibility of being flagged for a quarter or more until corrective actions are accepted and resolved
- vi. The possibility of invoices not being processed until corrective actions are accepted and resolved

If agency is at Medium or High Risk with unresolved deficiencies and/or there is persistent low performance, when new allocations are being released, the Agency may get 50% of their allocation until all corrective actions are accepted and resolved. In addition, Agencies with persistent low performance may be required to submit a corrective action plan which would include their work with other Weatherization Agencies to get assistance in resolving the persistent or continued issue/s.

If no resolution is possible or criminal activity is alleged, DCED will notify the US DOE of its intent to terminate contractual obligations with the specified subgrantee in its WX agency network and to replace it with another agency, and DCED requests US DOE's approval to amend its WX plan accordingly, pending completion of federal and state due process requirements.

Re-Allocation Plan

The Department will reallocate funds based on the WAP Risk Assessment results as well as performance including meeting production goals over the contract period. For annual DOE allocations, subgrantees who have not met their production goals for the prior year may be awarded 50% of their regular allocation. The subgrantees will receive written notification of the reasons for the reduction and the offer of guidance and assistance in resolving the issues. They must provide a specific timeline to meet the required performance criteria and production goals and respond to the Department's offer of guidance and assistance in resolving the issues with specific needs that can be addressed.

In addition, since this is the last year of the DOE grant (Year 5), as of December 31, 2021 or if a specific agency timeline or production goals are not met, funds will be reduced from under performing agencies and reallocated to agencies that will be able to spend the funds, meeting all quality and compliance standards. Prior to reducing the final annual funding level of any subgrantee, as a consequence of inadequate performance, the Department shall provide in writing to the subgrantee the specific reasons for the final funding reduction for the program year. PA has implemented a risk and performancebased allocation which is driven by a review of subgrantees' production, work quality, compliance and reporting. The Risk Level and due process for noncompliance requirements are distributed via this DOE state plan and to each agency when they are notified of their Risk Assessment results.

The benefits to this approach include:

Allocating additional funding to agencies demonstrating success in administering their annual allocations reflects the focus on quality and volume of work improving the Weatherization Program

- Reallocation of funding will ensure the increased efficiency and effectiveness of the program
- Successful agencies will better maintain their current workforce
- Competition will encourage exceptional performance of the agencies within the Weatherization Program

During the reallocation process, all agencies receiving additional funds will be asked for a specific plan to ensure that their allocation will be used to advance the program goals. If an agency does not provide an acceptable plan to effectively use the additional funds, the funds will not be allocated to that agency. Furthermore, if the Agency does not want additional funds they will not be required to accept the funds.

DCED's QCI Poor Performance Plan

These rules apply to the Quality Control Inspections which will be conducted by the Department QCIs. Consequences for poor performance will be based upon number and severity of failures.

Consequences for QCI may include:

- Schedule meeting with involved agencies and QC Inspector to discuss noncompliance issues
- Mandatory retraining
- 6 month suspension from performing QC Inspections
- 12 month suspension from performing QC Inspections
- Notification to BPI
- Debarment

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

The agency that is responsible for hiring the QCI to perform inspections whether it is through direct hire or subcontracted will be accountable for the work performed on the completed unit.

Utility Data Sharing

DCED and the Public Utility Commission (PUC) have agreed, pursuant to a memorandum of understanding, to share data and analyses of the two agencies' weatherization programs. This will allow for additional analysis in conjunction with PUC's oversight of the Act 129 low income programs.

V.7 Health and Safety

Plan is attached in SF-424

V.8 Program Management

V.8.1 Overview and Organization

The Pennsylvania Weatherization Assistance Program is administered through the Department of Community and Economic Development. The Secretary of the Department as the designee of the Governor, applies for, receives and administers the weatherization funds. The day to day operation of the weatherization program is managed through the Department's Center for Community Services (CCS). In addition to the Center for Community Services, the Office of Administration and Management is responsible for budgetary oversight and contract development and processing. The DCED Financial Management Center is responsible for the annual financial reviews of the subgrantees. In addition to administration of the program within the Department, the Office of Budget, Comptroller Operations office is responsible for final approval of subgrantee contracts, approval of payments to subgrantees, and fiscal reporting to the Department of Energy.

Department of Environmental Protection (DEP) houses the State Energy Program. They are represented on the PAC and we frequently meet with DEP Staff to collaborate on issues.

CENTER FOR COMMUNITY SERVICES

Executive Section

Director – Serves as the Director of the Center for Community Services, responsible for directing all office operations/projects and has authority to direct staff consistent with office policies and practices, with specific responsibility for:

- o Administrative Budget Oversight
- o Coordination with DOE, GAO and other partners
- o Implementation/Oversight of projects and office functions
- o Consulting Contracts oversight – e.g., PSU

WAP Division and Project Controls/Contract Compliance Section

A WAP Division Chief has been appointed to oversee all WAP Operations. This Section has program level responsibility for performing risk assessments, overseeing all activity reporting to ensure compliance with program performance metrics and recommending corrective, contractually based, action as and when appropriate. They are responsible for developing agency management plan criteria to ensure program compliance with rules and regulations promulgated by duly authorized entities. This Section also participates in the office's executive oversight of all Project Management Division staff and Agencies to ensure consistency in approach, compliance with policies and procedures and assists with the approval of payments working collaboratively with the Financial Management Center specific functions include:

Directing activities on all state plans. Including published for comment, hearing on revisions, responding to comments and submission to DOE

- o Wx Training
- o Contract collaboration and monitoring
- o Conduct Risk Assessments of all agencies

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

- o Manages all communications with agencies to ensure agency compliance (or lack thereof) with their contractual obligations is documented
- o Establish agency management plan criteria
- o Analysis and recommendations of Agency management plans
- o Develop and oversee formation of policy directives for communication to agencies
- o Compliance with DOE regulations,
- o Oversees contract approval and processing,
- o Analysis of agency management plan outcomes, performance, capacity, production data, and field monitoring reports for purposes of determining program compliance.
- o Submit reports to DOE regarding WAP production and contractual obligations

o Oversight of the staff engaged in the management of the Hancock Software System and new WAP software development.

o Partnering with the Clean Energy Center for the establishment of the PA Energy Audit Process and accompanying software tools.

o Promulgating procedures and providing information systems technology that support that support Hancock and the development and implementation of the new WAP software

WAP Monitoring Section

This Section is responsible for the monitoring and Quality Control Inspections of weatherized homes and the assigned subgrantees in accordance with DOE and LIHEAP requirements to ensure that all Agencies meet all contractual obligations and 5% of weatherized homes pass the QCI. Staff members within this Section are QCI certified and perform field inspections as well as desk monitoring of work performed by assigned Agencies to ensure Quality Assurance.

- Manages all communications with assigned agencies to ensure agency compliance (or lack thereof) with their contractual obligations is documented
- Energy audit protocols to evaluate the various methodologies
- Supervises field personnel that are monitoring agency field and office operations
- Responsible for ensuring accuracy and timeliness of agency reporting of factual information
- Oversees inspection of a limited number of homes for quality assurance and agency contract compliance
- Implements field controls program for prevention of fraud
- Assesses the need to provide support of the Wx agencies in daytoday operation of the program to achieve continuous improvement
- Conducts regular communication with all field supervisory personnel to identify trends and problems as well as the strengths and weaknesses of performing agencies in weatherization work.

V.8.2 Administrative Expenditure Limits

Agencies are allowed administrative costs to administer the Weatherization Assistance Program as allocated by the Department. Statewide, subgrantee administrative costs are at least seven and a half percent (7.5%) of the state's allocation prorated by formula for each agency.

V.8.3 Monitoring Activities

Monitoring Process

For the monitoring of DOE Standard Weatherization, at least 5% of the completed units will be site inspected utilizing the Quality Control Inspection (QCI) process. PA monitors 5% because we follow the Independent QCI rule from WPN 20-4: When the Subgrantee's QCI performs only the final quality control inspection, the Grantee must perform reviews of at least 5 percent of each Subgrantee's completed weatherized units (with DOE funds) using an independent QCI. In process units are inspected but not counted towards the 5% of the completed units monitored.

Approximately 20% of the T/TA budget is spent on monitoring activities.

@. Fiscal monitoring, including a review of the Single Audit Reports, of all WAP agencies will be conducted yearly by DCED's Fiscal Management Center utilizing a combination of desk and onsite monitoring. For this past year, due to the Pandemic, the fiscal monitoring has been conducted in the form of

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

desk monitoring.

- A. Risk Assessments will be conducted annually (preferably in January) using twenty-four (24) different descriptors/criteria that fall within the categories of Management/Financial Reporting, Production, Contract Compliance, Inventory, and Quality Control Inspections. Each descriptor is measured and weighed, and a risk level will be assigned to each agency at the conclusion of the assessment. If applicable, a corrective action plan will be required.

DCED Monitoring Results/Reports

A. Each monitoring report is reviewed, and a written response generated to the agency within 30 days outlining findings, recommendations, and requests for a followup response and/or corrective action plan. In addition, any technical issues that require further training or technical assistance will be addressed by scheduling additional technical visits with our QCIs and/or the training center, Clean Energy Center. Ongoing programmatic issues will be addressed in a variety of ways, for example, weekly reports may be required, participation in regional meetings may be required and/or collaboration with other agencies on an issue or specific training may be recommended. All results of both program and financial monitoring are tracked to final resolution. A separate tracking is maintained identifying the date the monitoring letter is mailed and the response due date. If a response is not received by the requested due date, the agency is again notified in writing. Upon receipt, the Agency's response is reviewed, and the agency is notified in writing of the acceptance and closure of the findings, or the request for further follow-up.

Due Process for NonCompliance

- A. Corrective Action Plans (CAP) will be required in response to monitoring findings within 15 days of receipt. Unless otherwise stated and viable reasons provided, all corrective actions should have a resolution date of no more than 90 business days after CAP submission.
- B. Risk Levels
- a. Corrective Action Plans (CAP) will be required for all Levels within 15 business days of receipt of their Risk Level. Unless otherwise stated and viable reasons provided, all corrective actions should have a resolution date of no more than 90 business days after CAP submission.
 - b. If an agency reaches Medium Risk:
 - i. A meeting will be scheduled with them to discuss the issues
 - ii. Onsite training will be required, if applicable
 - iii. In progress or more frequent QCIs may be completed, if applicable
 - iv. Funding may be affected if production is an issue
 - c. If an agency reaches High Risk:
 - i. A meeting will be scheduled with them to discuss the issues
 - ii. Onsite training will be required, if applicable
 - iii. In progress QCIs or more frequent QCIs must be completed, if QCI issues have been identified
 - iv. Funding will be reconsidered quarterly
 - v. The possibility of being flagged for a quarter or more until corrective actions are accepted and resolved
 - vi. The possibility of invoices not being processed until corrective actions are accepted and resolved

If agency is at Medium or High Risk with unresolved deficiencies and/or there is persistent low performance, when new allocations are being released, the Agency may get 50% of their allocation until all corrective actions are accepted and resolved. In addition, Agencies with persistent low performance may be required to submit a corrective action plan which would include their work with other Weatherization Agencies to get assistance in resolving the persistent or continued issue/s.

If no resolution is possible or criminal activity is alleged, DCED will notify the US DOE of its intent to terminate contractual obligations with the specified subgrantee in its WX agency network and to replace it with another agency, and DCED requests US DOE's approval to amend its WX plan accordingly, pending completion of federal and state due process requirements.

B. Re Allocation Plan

The Department will reallocate funds based on the WAP Risk Assessment results as well as performance including meeting production goals over the contract period. For annual DOE allocations, subgrantees who have not met their production goals for the prior year may be awarded 50% of their regular allocation. The subgrantees will receive written notification of the reasons for the reduction and the offer of guidance and assistance in resolving the issues. They must provide a specific timeline to meet the required performance criteria and production goals and respond to the Department's offer of guidance and assistance in resolving the issues with specific needs that can be addressed.

In addition, since this is the last year of the DOE grant (Year 5), as of December 31, 2021 or if a specific agency timeline or production goals are not met, funds will be reduced from under performing agencies and reallocated to agencies that will be able to spend the funds, meeting all quality and compliance standards. Prior to reducing the final annual funding level of any subgrantee, as a consequence of inadequate performance, the Department shall provide in writing to the subgrantee the specific reasons for the final funding reduction for the program year.

PA has implemented a risk and performance based allocation which is driven by a review of subgrantees' production, work quality, compliance

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

and reporting. The Risk Level and due process for noncompliance requirements are distributed via the DOE state plan and to each agency when they are notified of their Risk Assessment results.

- a. The benefits to this approach include:
- i. Allocating additional funding to agencies demonstrating success in administering their annual allocations reflects the focus on quality and volume of work improving the Weatherization Program.
 - ii. Reallocation of funding will ensure the increased efficiency and effectiveness of the program.
 - iii. Successful agencies will better maintain their current workforce.
 - iv. Competition will encourage exceptional performance of the agencies within the Weatherization Program.
 - v. During the reallocation process, all agencies receiving additional funds will be asked for a specific plan to ensure that their allocation will be used to advance the program goals. If an agency does not provide an acceptable plan to effectively use the additional funds, the funds will not be allocated to that agency. Furthermore, if the Agency does not want additional funds they will not be required to accept the funds.

DCED's QCI Poor Performance Plan

- A. These rules apply to the Quality Control Inspections which will be conducted by the Department QCIs. Consequences for poor performance will be based upon number and severity of failures.
- B. Consequences for QCI may include:
- a. Schedule meeting with involved agencies and QC Inspector to discuss noncompliance issues
 - b. Mandatory retraining
 - c. 6 month suspension from performing QC Inspections
 - d. 12 month suspension from performing QC Inspections
 - e. Notification to BPI
 - f. Debarment
- C. The agency that is responsible for hiring the QCI to perform inspections whether it is through direct hire or subcontracted will be accountable for the work performed on the completed unit.

V.8.4 Training and Technical Assistance Approach and Activities

Please see attached T/TA Template in SF-424.

Percent of overall trainings

Comprehensive Trainings:	82.4
Specific Trainings:	17.6

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	40.9
Percent of budget allocated to Crew/Installer trainings:	39.1
Percent of budget allocated to Management/Financial trainings:	17.5

V.9 Energy Crisis and Disaster Plan

The Department limits the use of DOE funds for Energy Crisis Relief or Disaster activities. In the event of a declared Federal or State disaster, weatherization crews are permitted to return to a unit, which was previously reported to DOE as complete, to reweatherize without regard to the date of weatherization if that unit has been "damaged by fire, flood, or act of God." Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if damage to the materials is not covered by insurance or other form of compensation. The limits on incidental repairs and Health and Safety percentages defined in the Health and Safety Plan remain in effect for such work. Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such function and activities include: securing weatherization materials, tools and equipment. Weatherization vehicles and/or equipment may be used to help assist in disaster relief provided that WAP is reimbursed according to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards codified under 2 CFR.

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

(Grant Number: EE0007946, State: PA, Program Year: 2019)

In addition, as part of the weatherization program, beginning in PY 1992/93 and continuing since then, DCED in cooperation with the Department of Human Services (DHS) utilizes a portion of LIHEAP funds to provide emergency heating services as part of the LIHEAP Crisis Program. The Crisis Interface program component operates normally from November through March of each year and is designed to provide services for weather-related emergencies in households without heat or in imminent danger of not having heat. Services such as emergency heating system repair or replacement, loaning auxiliary heaters, and repairing fuel lines are offered. DHS through their county assistance offices identify clients needing Crisis services, determine eligibility, and make referrals to the appropriate weatherization agency for service. The weatherization agency then inspects the dwelling and takes the necessary action to alleviate the crisis. Currently, the weatherization assistance program statewide expends about 70% of the overall LIHEAP funding on crisis activities, which provides Crisis assistance to over 7,000 households annually.