

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009935	2. Program/Project Title Weatherization Assistance Program
3. Name and Address State of Vermont Office of Economic Opportunity Waterbury, VT 056711050	4. Program/Project Start Date 07/01/2023
	5. Completion Date 06/30/2024

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. DOE 2023 WAP Formula Funds	81.042	\$ 0.00		\$ 1,874,599.00		\$ 1,874,599.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 1,874,599.00	\$ 0.00	\$ 1,874,599.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) GRANTEE T&TA	(3) SUBGRANTEE ADMINISTRATI ON	(4) PROGRAM OPERATIONS	
a. Personnel	\$ 0.00	\$ 69,763.00	\$ 0.00	\$ 0.00	\$ 69,763.00
b. Fringe Benefits	\$ 0.00	\$ 21,850.00	\$ 0.00	\$ 0.00	\$ 21,850.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 0.00	\$ 0.00	\$ 231,788.00	\$ 1,270,496.00	\$ 1,782,986.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 0.00	\$ 91,613.00	\$ 231,788.00	\$ 1,270,496.00	\$ 1,874,599.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 0.00	\$ 91,613.00	\$ 231,788.00	\$ 1,270,496.00	\$ 1,874,599.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 1,874,599.00	\$ 0.00	\$ 1,874,599.00

SECTION B - BUDGET CATEGORIES						
6. Object Class Categories	Grant Program, Function or Activity					Total (5)
	(1) LIABILITY INSURANCE	(2) HEALTH AND SAFETY	(3) SUBGRANTEE T&TA	(4) Weatherization Readiness		
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 69,763.00	
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 21,850.00	
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
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	\$ 31,410.00	\$ 0.00	\$ 50,000.00	\$ 199,292.00	\$ 1,782,986.00	
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
i. Total Direct Charges	\$ 31,410.00	\$ 0.00	\$ 50,000.00	\$ 199,292.00	\$ 1,874,599.00	
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
k. Totals	\$ 31,410.00	\$ 0.00	\$ 50,000.00	\$ 199,292.00	\$ 1,874,599.00	
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	

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IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
BROC Community Action in Southwestern Vermont (Rutland)	\$331,635.32 29
Capstone Community Action Council (Barre)	\$345,899.21 30
Champlain Valley Office of Economic Opportunity (Burlington)	\$438,614.46 38
Northeast Employment and Training Organization (Derby)	\$351,248.17 30
Southeast Vermont Community Action (Westminster)	\$315,588.45 27
Total:	\$1,782,985.61 154

IV.2 WAP Production Schedule

Weatherization Plans		Units
Total Units (excluding reweatherized)		154
Reweatherized Units		0
Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	154
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	154
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	\$1,270,496.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	154
H	Average Program Operations Costs per Unit (F divided by G)	\$8,249.97
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$8,249.97

IV.3 Energy Savings

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)				
		Units	Savings Calculator (MBtus)	Energy Savings
	This Year Estimate	154	29.3	4512
	Prior Year Estimate	129	29.3	3780
	Prior Year Actual	105	29.3	3076
Method used to calculate savings description:				
Section 440.14(b)(5) - Estimated Energy Savings				

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using methods from prior years to estimate energy savings. The average Wx client in Vermont uses 780 gallons of oil a year. We project our average yearly energy savings from Weatherization to be 30%.

IV.4 DOE-Funded Leveraging Activities

Section 440.14 (b) (9) (xiv) - Leveraging Additional Funds

DOE funded homes that are Weatherized will receive enhanced client education and electrical baseload saving measures. The enhanced client education takes part via the Efficiency Coach visit. This initial Weatherization visit is separate from the Energy Auditor visit and is paid for via State Weatherization Program dollars, not DOE funds. The electrical efficiency measures are funded by Vermont's state wide utility Efficiency Vermont who funds energy efficient light bulbs, old fridge and freezer replacement, as well as other measures designed to lower the clients electric bills. The presence of the EVT "ADD ON Program" allows all of DOE funds to be used for Thermal Efficiency work as well as the appropriate Health and Safety work. No DOE funds will be used for Electrical savings measures. The separate Efficiency Coach visit (funded by State Weatherization funds) is instrumental in ensuring client education, and communication is established. This process is over 8 years old now and has significantly improved client education and communication and has allowed our program to implement our "One Touch" referral program that links clients with other applicable programs (social, health, and housing). The average Wx client living in a single family home, saves approximately 1,000 kwh per year of electricity which equates to approximately \$150 per year. Efficiency Vermont contributes approximately \$1,000 per household for Efficiency measures.

IV.5 Policy Advisory Council Members

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

Champlain Valley Office of Economic Opportunity	Type of organization: Non-profit (not a financial institution) Contact Name: Paul Dragon Phone: 8024824180 Email: pdragon@cvoeo.org
Community Representative	Type of organization: Other Contact Name: Elaine Jacovini Phone: 8028788031 Email: elainejuliet1@gmail.com
Department of Children & Families Economic Services Division	Type of organization: Unit of State Government Contact Name: Mr. Richard Giddings Phone: 8027696448 Email: richard.giddings@vermont.gov
Dept. of Public Service	Type of organization: Unit of State Government Contact Name: Kelly Launder Phone: 8028280110 Email: kelly.launder@state.vt.us
Electrical Utility	Type of organization: Utility Contact Name: Holly Bruso Phone: 8888364672 Email: holly.bruso@greenmountainpower.com
U.S. Department of Agriculture	Type of organization: Unit of Federal Government Contact Name: Misty Sinsigalli Phone: 8028286069 Email: misty.sinsigalli@usda.gov
Vermont Department of Health	Type of organization: Unit of State Government Contact Name: Jared Ulmer Phone: 8028657784 Email: jared.ulmer@vermont.gov
Vermont Energy Investment Coop	Type of organization: Non-profit (not a financial institution) Contact Name: Tim Yandow Phone: 8028604099 Email: tyandow@veic.org
Vermont Fuel Dealers Association	Type of organization: Other Contact Name: Mr. Matt Cota Phone: (802)375-0000 Email: matt@vermontfuel.com

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Vermont Housing Conservation Board	Type of organization: Non-profit (not a financial institution) Contact Name: Craig Peltier Phone: 8028283250 Email: craig@vhcb.org
Vt Gas	Type of organization: Utility Contact Name: Tim Perrin Phone: 8028634511 Email: tperrin@vermontgas.com
Weatherization Assistance Program	Type of organization: Local agency Contact Name: Shanna Smith Phone: 8023347378 Email: shanna.smith@vtneto.org

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

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/14/2023	The public hearing was posted in the Burlington Free Press on April 14, 2023. This public hearing was a virtual meeting held via TEAMS Meeting and phone call in option. It was held April 28, 2023 at 10 AM virtually via conf. call and TEAMS meeting. Details of each are attached to this state plan.

IV.7 Miscellaneous

PY23 Readiness Funds Implementation:

Vermont WAP: Weatherization Readiness Fund (WRF)

Note: for all details on Vermont's WRF, please see attached Wx Program Notice to SF-424.

WRF will be used to prevent deferral of units when the work needed before a home can receive services is beyond the scope or budget of Weatherization.

Distribution of Funds

Funds will be distributed to each agency using the same agency allocation formula as program funding.

Restrictions

The following restrictions will apply to the use of Readiness funding:

- OEO approval is required by Agencies for projects over \$3,700.

Monitoring

OEO will monitor the use of this funding in accordance with the regular monitoring of Wx Services. This includes desk monitoring before an invoice is paid, and QCI when a unit is selected for inspection.

Maximum ACPU

Agencies must keep the ACPU for this category at or below \$8,000. This is kept separate from the weatherization and H&S ACPUs.

Tracking and Reporting

The following items are currently tracked and will continue to be tracked:

- Location
- Client Ranking
- House type
- Year built
- Specific nature of repairs
- Per unit average
- Other funds used

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Process

- Homes that have been previously deferred that are still eligible will be the first to receive services. For all other WRF needs, the agencies must follow the same priority and ranking used for weatherization.
- Agencies will follow the already existing policies used with OEO's Home Repair Funds which can be shared. This includes an \$8,000 cap per home.
- All state and local codes must be followed with WRF.
- Weatherization work is expected to occur as close to completion of WRF work as possible.
- Final QCI for the weatherization work includes final inspection of the WRF work. If deficiencies are present, a punch list for the contractor is generated and the contracting party does not receive final payment until the work is satisfactory.
 - Both the client and final inspector must sign off on the scope of work for both WRF and weatherization (two signatures are required).
- Completed units are reported to OEO during invoicing.
- Units that received WRF are tracked separate with their own ACPU
- MFA will include a sample of units that received WRF as part of the minimum 10% QCI.
- Units that need work that is beyond what WRF, other funding sources, and weatherization can provide will be deferred following the regular deferral policy and tracked.

Please Note: The State of Vermont Agency Of Human Services Cost Allocation Plan is attached to the SF-424.

The affidavit from the Burlington Free Press was posted April 14, 2023 stating the time and link to a TEAMS Meeting and phone call number for a phone in option. This affidavit is attached to the SF-424.

The OEO office continues to use feedback from the ACSI survey in order to strengthen its working relationship with the 5 local Weatherization providers across Vermont. Monthly meetings occur between the 5 local Weatherization Directors and the OEO Weatherization office. During the COVID shutdown, OEO and the 5 local Wx Program leadership teams have held weekly check ins to keep each other informed and supported. OEO respects the views of its subgrantees and is always looking for input and buy in when implementing new initiatives.

The Recipient Business Officer for this award is Sarah Phillips, Director of the Vermont Office of Economic Opportunity.

Sarah Phillips

Director

Office of Economic Opportunity

Department for Children and Families

Mailing and Physical Address: 280 State Drive HC 1 North, Waterbury, VT 05671-1801

Office: 802/241-0938

Cell: 802/585-9218

sarah.phillips@vermont.gov

The Recipient Principal Investigator for this award is Geoff Wilcox, Vermont Weatherization Program Administrator.

Geoff Wilcox

Weatherization Program Administrator

Phone 802-241-0943

Cell: 802-279-7964

Email geoff.wilcox@vermont.gov

State of Vermont

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Office of Economic Opportunity

280 State Drive, HC 1 North

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Section 440.14(b)(9)(xii) - Definition of Low Income

The definition of low income chosen by the State of Vermont for determining eligibility of Department of Energy (DOE) funds for low income weatherization is households whose income is at or below 200% of the federal poverty guidelines for the number of family members in that household.

Vermont's WAP does elect to classify households that receive assistance under the Low Income Home Energy Assistance Act of 1981 (LIHEAP) to be eligible for DOE WAP services, provided that the income eligibility level for the LIHEAP program in Vermont is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget. We hereby affirm in writing that the income eligibility level for the LIHEAP program in Vermont is currently, and will remain throughout the duration of the upcoming program year, established at a threshold that is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget and it is not arbitrarily lowered for any part(s) of our statewide WAP service territory. When classifying a DOE WAP applicant as eligible for services based on their receipt of LIHEAP services, the application eligibility expires 12 months from the eligibility certification date if work on the dwelling unit, i.e., the energy audit has not yet been initiated.

Describe what household eligibility basis will be used in the Program

Section 440.16(a) - Dwelling Unit Eligibility Determination and prioritization of households.

No dwelling unit may be weatherized without documentation that the unit is an eligible unit. The WAP shall determine eligibility through utilization of a client intake/declaration form. The following informational items on each dwelling unit will be collected and retained by OEO as part of the documentation of records for the program:

- 1.Name/address of client.
- 2.Total gross annual household income/No. persons in household.
- 3.Whether property is owner/renter occupied.
- 4.To insure that only eligible units are weatherized, income and public assistance payments are verified by employers or the appropriate government agency from whom the client(s) receives income or assistance.
 - (a) In accordance with Section 440.22 of 10 CFR Part 440, no dwelling unit shall be eligible for weatherization assistance unless it is the dwelling unit of a family unit (meaning an income eligible family lives in the home):
 - (1) Whose income is at or below 200% of federal poverty limit determined in accordance with criteria established by the Director of the Office of Management and Budget; or
 - (2) Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law during the twelve-month period preceding the determination of eligibility for weatherization assistance; or
 - (b) No building containing rental dwelling units eligible for weatherization assistance under paragraph (a) of this section may be weatherized unless:
 - (1) The subgrantee has obtained the written permission of the owner or his/her agent;
 - (2) The subgrantee, the tenant, and the owner have completed and signed the tenant/owner agreement, which states that rents shall not be raised for at least a year following the completion of the weatherization work. Since PY 16, rental units in which the building owner pays for the heat, a 3 year minimum rent stabilization must be in place before Wx can occur. If the low income tenant pays for their heat, then a one year rent stabilization must be in place.
 - (3) Outreach activities have made every effort to determine the number of eligible units in a multi-unit building.
- (1) Once an apartment in a multi-dwelling unit is eligible to be weatherized, any work that is done must strictly apply and have a direct benefit to the eligible apartment.

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(ii) Apartments may be weatherized if they will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the structure.

Prioritization of Clients: The Hancock Energy Software Program prioritizes clients and provides a WAP rank for service. See the explanation of algorithm that Hancock uses.

DOE Funded Multi Family Building Eligibility Criteria:

The eligibility criteria in regards to multi family buildings require:

A minimum of 66% of the dwelling units in a building are occupied by a family unit that meets the income requirement, or a minimum of 50% of the dwelling units are eligible in duplexes, four unit buildings, and certain eligible types of large multi family buildings or property be listed on DOE approved HUD lists.

Note: When addressing multi family units with DOE funds, multiply the total number of income eligible units in the building by the current average cost per unit to determine the amount of DOE funding available for weatherizing the building. Weatherization can result in improvements to all units in the building, even those that are not eligible. All units should be reported to DOE.

VERMONT WAP Client Rank Algorithm

1. The client's with the highest WAP rank, determined from point criteria, will be served before a client with a lower WAP rank if there is a wait list.

Client WAP ranks are determined by points per criteria described below.

1. Factor: Categorical Eligibility

∅ Details: 5 points added if client is an active fuel assistance recipient

2. Factor: High Usage **MMBTU equivalent of 850 gallons of fuel oil per year*

∅ Details: 5 points added if client exceeds the high use threshold

3. Factor: Elderly **only the first occurrence generates points*

∅ Details: 3 points added if elderly client in household aged 60 -69 yrs. old

∅ Details: 5 points added if elderly client in household aged 70 yrs. (+)

Elderly points are only added for 1 person (the oldest) residing in the household. If there is a 60 year old and a 70 year old in the household then only the points for the 70 year old would be accrued.

4. Factor: Disability **only the first occurrence generates points*

∅ Details: 5 points added if there is a disabled client in household

5. Factor: Households with Children **only the first occurrence generates points*

∅ Details: 5 points added if there is a child aged 0-5 in household

∅ Details: 3 points added if there is a child aged 6-17 in household

Child points are only added for 1 person (the youngest) residing in the household. If there is a 3 year old and a 10 year old in the household then only the points for the 3 year old would be accrued.

6. Factor: Client is Eligible for Vermont WAP Services

∅ Details: 1 point automatically added for all program eligible households

Please note that the algorithm above is applied for clients residing in single dwelling unit homes that are entered via the client list in the Hancock software.

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For all clients residing in two-dwelling unit structures and larger, only one prioritization point will be automatically generated by the Hancock software and the point is awarded to the project as a whole.

All clients/projects in two dwelling unit structures and larger, are entered via the multi-family list in the Hancock software.

Agencies shall prioritize projects that are entered via the multi-family list in the Hancock software in accordance with Chapter 6 of the Administrative Policies and Procedures Manual. See below for this prioritization criteria for multi family projects.

Table 6.1 Priority Criteria for Rental or Multifamily Jobs	
Item in Rank Order	Priority given to . . .
1. LIHEAP	Buildings with LIHEAP-eligible tenants.
2. Who pays for heat?	Buildings with tenants paying heat.
3. Building demographics	Projects housing elderly, disabled, and families with children.
4. Energy intensity	Buildings with highest energy intensity, measured in Btu/ft ² /heating degree day.
5. Rent stabilization period	Buildings with the longest existing or owner-agreed-to future rent stabilization period.
6. Tenants' average income	Buildings with the lowest average tenant income.
7. Magnitude of job	Larger projects and/or full ("gut") rehabilitation.
8. Private or public project?	Projects that are publicly, rather than privately, owned.

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

Qualified aliens are eligible to receive state benefits including weatherization as documented in OEO's Weatherization Administrative Policy and Procedures Manual.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Section 440.16(a) - Dwelling Unit Eligibility Determination

No dwelling unit may be weatherized without documentation that the unit is an eligible unit. The WAP shall determine eligibility through utilization of a client intake/declaration form. The following informational items on each dwelling unit will be collected and retained by OEO as part of the permanent records of the program:

1. Name/address of client.
 2. Total annual household income and number of persons in household.
 3. Public assistance payments received during the previous twelve months.
 4. Whether property is owner/renter occupied.
 5. To insure that only eligible units are weatherized, income and public assistance payments are verified by employers or the appropriate government agency from which the client(s) receives income or assistance.
- (a) In accordance with Section 440.22 of 10 CFR Part 440, no dwelling unit shall be eligible for weatherization assistance unless it is the dwelling unit of a family unit:
- (1) Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law during the twelve-month period preceding the determination of eligibility for weatherization assistance; or
 - (2) Whose income is at or below 200% of federal poverty guidelines, but not to be placed ahead, on a waiting list, of households containing elderly or handicapped persons, children, or households with incomes of 125% of the federal poverty guidelines; or
 - (3) or the building / property appears on the HUD List provided and specified in DOE WPN.

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(b) No building containing rental dwelling units eligible for weatherization assistance under paragraph (a) of this section may be weatherized unless:

(1) The subgrantee has obtained the written permission of the owner or his/her agent;

(2) The subgrantee, the tenant, and the owner have completed and signed the tenant/owner agreement, which states that rents shall not be raised for at least a year following the completion of the weatherization work if the tenant pays for the heat, and not raised for 3 years if the landlord pays for the heat.

(b) The landlord tenant agreement states the rent will not be raised, and tenants are told if this is not adhered to, to contact the WAP office.

(3) Outreach activities have made every effort to determine the number of eligible units in a multi-unit building.

(i) One apartment in a multi-dwelling unit is eligible to be weatherized. Any work that is done must strictly apply and have a direct benefit to the eligible apartment.

(ii) Not less than 66% of the dwelling units in the building must be eligible in order to treat the entire building envelope and shared heating systems. In these cases, wall insulation, attic insulation, heating systems and air leakage control work may be performed on the entire building. Any work that is to be done in an ineligible unit must be done in order to improve the energy performance of the eligible units.

(iii) Apartments may be weatherized if they will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the structure.

(iv) The grantee and subgrantees, in order to avoid undue or excessive enhancement in the value of rental dwelling units resulting from the provision of weatherization services, have strengthened the owner tenant agreement.

Re-Weatherization: The 15 year rolling Re-Weatherization date (from date previous job was closed) has been implemented for both State and DOE funded Weatherization projects in Vermont.

Deferral Process: If a client is eligible, however their dwelling unit has substantial Health and Safety or Structural Issues the building may be deferred until a time when these issues can be resolved. The Vermont Weatherization Program considers the "House is a System" and moisture and structural issues are taken into consideration at every audit. The presence of vermiculite Insulation is not an automatic deferral. If a client's home is to be deferred they are made aware of in writing and in person and then help is given by referring to other programs and agencies to resolve the issues. The VT Wx Program uses a referral program called "One Touch", that refers clients to other programs they are eligible for such as the Lead Program, Programs for elderly, etc. This One Touch referral also refers clients to other grant or funding sources to help with repairs that are outside of the Wx Programs jurisdiction.

In recent years, OEO has dedicated significant funds (non DOE) to be used to reduce the number of deferrals in our program. These funds are used to address needed home repairs and vermiculite remediation that must be done before Weatherization can occur. The DOE Weatherization Readiness funds are used in this manner. Processes and procedures are in place to ensure that these non Weatherization funds are used to address these potential deferral items in a manner that does not supplant Weatherization funds and are used to help the most homes as possible avoid deferral of Weatherization services.

Describe Reweatherization compliance

No buildings will be weatherized that have been previously Weatherized in the past 15 years (rolling re-Weatherization date). Each agency is required to check the address of a home of a client that has applied for weatherization against a complete list of previously weatherized homes dating back to 2000. If it has been weatherized within the last 15 years, no services will be provided to that home. The date the project was closed, is the date that must be at minimum 15 years or longer from date a client can be deemed eligible for Weatherization again.

The reweatherization date for State Weatherization Funds is the same. Agencies however have the ability to request a waiver of OEO for reweatherization regardless of the prior closed date with proper justification (significant cost effective energy savings opportunities or significant missed opportunities / questionable quality work during original Weatherizaition). Any reweatherization allowed in those circumstances will be purely funded with state Weatherization funds.

Describe what structures are eligible for weatherization

A structure is eligible for weatherization if an eligible client lives there and it is their documented primary residence, as long as the home has no structural or health or safety issues that are beyond the scope of weatherization. A camper on wheels is not weatherized (however no heat situations can be repaired via the state funded Emergency Heating System Grant). Mobile homes, and site built homes and multi family buildings are weatherized.

The Vermont Multi Family / Rental Property Policy and Procedures Manual documents the Vermont weatherization program policies regarding DOE funding and State Weatherization funding. It clearly documents the processes that assure Vermont follows DOE's rules regarding the weatherization of rental properties.

Describe how Rental Units/Multifamily Buildings will be addressed

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New for PY23, 5 or more unit Multi Family Buildings will not be Weatherized with DOE funds. OEO has a grant in place with a state wide Multi Family Provider (3E Thermal), that is part of one of its Community Action Agencies (Capstone), who will receive enough funds to Weatherize 302 units statewide, to the same standards that DOE requires, and which are documented below. The 5 local Weatherization Agencies funded by DOE funds will only be weatherizing 1-4 unit homes.

The same is always true, just the source of funding is no longer DOE. The State of Vermont's Weatherization Program encourages weatherization of eligible multi family buildings. The DOE rules and regulations are followed in terms of eligibility, cost per unit, etc. Health and Safety issues are identified at the energy audit and any necessary repairs or measures are the responsibility of the building owner unless the owner is income eligible. These repairs must be done by the landlord before the installation of energy saving measures begins. A list of these Landlord Responsibilities and the form used to document and attest owner agreement is attached to the State Plan (Form 617 MF Owner Responsibilities).

Funds spent on multi family / rental buildings are strictly for cost effective thermal measures (air sealing and insulation). Electrical efficiency measures are leveraged and paid for by Efficiency Vermont.

The Office of Economic Opportunity has separate Multi Family / Rental Policies and Procedures and accompanying forms. This document specifies both DOE and State funded projects and is available upon request.

The benefits of multi family weatherization must primarily accrue to the tenant. This is guaranteed primarily through the requirement of a 5 year rent stabilization agreement for all units that are income eligible for Weatherization services, regardless of who pays the heat. A maximum 2% rent increase per year is allowed as long as it is justified for reasons not related to Weatherization. This was recently discussed, reviewed and approved by our Wx Policy Advisory Council.

Describe the deferral Process

Please see the Vermont Weatherization Deferral Policy that is attached. The VT WAP continues to evolve and find ways to reduce if not eliminate the deferral of Weatherization Projects. This can be challenging as Vermont has the second oldest housing stock in the United States, and many of our clients, being low income have had to defer maintenance in order to pay for other necessities of life. We continue to develop relationships with other programs such as the USDA Rural Development 504 loan / grant program, and the network of Homeownership Centers in Vermont that offer home repair programs to low income clients. Our deferral policy was updated in 2022 to ensure clients are provided information on what is prohibiting weatherization, what needs to be done before it can resume, the benefits of weatherization, and resources available from the Weatherization Program (home repair funds or incidental repair funds). The Program refers clients to other programs for resources as well.

Vermont in the recent year has added an additional funding source for Home Repairs and Vermiculite. This funding is from the Vermont Community Foundation and is allocated to each agency via a separate grant from OEO to the 5 WAPS. Also, ARPA SFR funds are being used as well by OEO to provide Home Repair and Deferral funding to the WAPS which is leveraged or used to pay for Home Repairs and Vermiculite Abatement.

See attached Deferral Policies (to SF 424).

See the Health and Safety Plan for specifics on what is an allowable health and safety expense.

Partial weatherization / measure skipping: The Vermont Weatherization Program does not allow partial weatherization projects or the skipping of major measures. A project must meet the specifications of the Tech. manual or be referred to other funding sources until items hindering complete weatherization are resolved. If a client does not want a certain measure completed, the Weatherization Agency will submit an Atypical Project Form to OEO for review and pre-approval (required). OEO will review each on a case by case basis and determine if the scope meets the overall goals of the TEC manual and the VT Weatherization Program and if so, will approve. Incomplete or partial Weatherization jobs are not allowed or approved. Typically these "atypical" projects are paid for with state Weatherization funds.

V.1.3 Definition of Children

Definition of children (below age): **6**

V.1.4 Approach to Tribal Organizations

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

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

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Section 440.16(f) - Indian Tribe Benefits

There is no federally recognized Indian tribe within the State of Vermont. However low-income Vermonters who are Native American shall receive benefits equivalent to the assistance provided to other low-income citizens within the State of Vermont. No provision for a separate application has been made pursuant to Section 440.12 (b)(5).

Native American dwelling unit characteristics and the number of anticipated unit completions are located in Sections 440.14(b)(2)(I)-(vi) and 440.14(b)(6)-(7).

V.2 Selection of Areas to Be Served

Section 440.14(b)(9)(ii) - Subgrantee Selection

The State of Vermont has used the same 5 subgrantees that receive DOE funds, for the past 46 years. The selection of the agencies to be subgrantees was made on the basis of public comment received during public hearings and on the basis of the following findings as specified under Section 440.15(a)(2) and 440.15(a)(3).

Section 440.15(a)(2) states

- "(i) The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
- (ii) The quality of work performed by the subgrantee.
- (iii) The number, qualifications, and experience of the staff members of the subgrantee; and
- (iv) The ability of the subgrantee to secure volunteers, training participants and public service employment workers pursuant to JTPA."

All counties and towns in the State of Vermont are eligible for service by the State of Vermont Weatherization Program.

In 2019, the State of Vermont added a 6th subgrantee on a pilot basis to provide state-wide Multi Family Weatherization services. This pilot has been successful and purely funded with state Weatherization dollars or ARPA SFR funds. No DOE Funds are provided to the Statewide MF Provider. This provider, 3E Thermal will continue as a Vermont WAP subgrantee for the foreseeable future.

V.3 Priorities

Section 440.16(b) - Prioritization of Weatherization Services

The Vermont Weatherization Program utilizes its web based data management system (HES / Hancock Energy Software) to prioritize eligible clients based on the criteria below. Because of waiting lists at all 5 Subgrantees, prioritizing service is critical in order to help those in the greatest need. Hancock provides the weatherization agency or provider with a "WAP Ranking" of all eligible clients based on these criteria. The providers start the weatherization process for clients by starting with the highest WAP rank available at the time.

The WAP Rank or prioritization of service is described below.

VERMONT WAP

Client Rank Algorithm

2023

1. Factor: Categorical Eligibility

Ø Details: 5 points added if client is an active fuel assistance recipient

2. Income: clients with income less than 125% of FPL are given 10 points.

3. Factor: High Usage *Mmbtu equivalent of 850 gallons of fuel oil per year

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∅ Details: 5 points added if client exceeds the high use threshold

4. Factor: Elderly **only the first occurrence generates points*

∅ Details: 3 points added if elderly client in household aged 60 -69 yrs. old

∅ Details: 5 points added if elderly client in household aged 70 yrs. (+)

Elderly points are only added for 1 person (the oldest) residing in the household. If there is a 60 year old and a 70 year old in the household then only the points for the 70 year old would be accrued.

5. Factor: Disability **only the first occurrence generates points*

∅ Details: 5 points added if there is a disabled client in household

6. Factor: Households with Children **only the first occurrence generates points*

∅ Details: 5 points added if there is a child aged 0-5 in household

∅ Details: 3 points added if there is a child aged 6-17 in household

Child points are only added for 1 person (the youngest) residing in the household. If there is a 3 year old and a 10 year old in the household then only the points for the 3 year old would be accrued.

7. Factor: Client is Eligible for Vermont WAP Services

∅ Details: 1 point automatically added for all program eligible households

Please note that the algorithm above is applied for clients residing in single dwelling unit homes that are entered via the client list in the Hancock software.

For all clients residing in two-dwelling unit structures and larger only one prioritization point will be automatically generated by the Hancock software and the point is awarded to the project as a whole.

All clients/projects in two dwelling unit structures and larger are entered via the multi-family list in the Hancock software.

Agencies shall prioritize projects that are entered via the multi-family list in the Hancock software in accordance with Chapter 6 of the Administrative Policies and Procedures Manual.

V.4 Climatic Conditions

Section 440.14(b)(3) - Statewide Climatic Conditions

Heating degree days vary by region but not significantly. Montpelier is the State Capital and has the "average" climate in the state. The HDD for a 12 month period averages in the 7,600- 8,200 range. Vermont has long cold winters throughout the state. Currently each agency is selecting a neighboring city in the Hancock energy audit tool that most closely represents the HDD's in their area, however each area of the state is within 10% plus or minus of Montpeliers.

Being a fairly small state, typically climatic conditions are the same throughout the state (precipitation, humidity, etc.).

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

Section 440.14(b)(4) - Types of Weatherization Work to be Performed

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Technical Requirement and Specifications: Vermont requires adherence to its TEC Manual which is SWS compliant, and is also our field guide. Vermont requires adherence of its DOE and State funded weatherization work to the DOE QCI requirements. The following language is in DOE Weatherization Grants between OEO and its 5 subgrantees in order to relay this importance to subgrantees. "All weatherization work will comply with, and be consistent with, HES the DOE approved energy auditing tool and procedures for Vermont WAP. All weatherization work will be directed by a work order that meets the requirements of the State Weatherization Guidelines and compliant with the DOE-approved field guide that is cross referenced to the most recent SWS. All materials purchased and installed will comply with 10 CFR 440 Appendix A. Confirmation of the delivery of these requirements, as well as acknowledgement and confirmation of the necessity to comply with them is evidenced via signature on the executed grant."

Assuring Subgrantee acknowledgement of WPN 15-4 (SWS and QCI requirements): OEO's "TEC Manual" provides clear guidance. The TEC Manual is both SWS compliant, user friendly and an approved field guide. All subgrantees must be compliant with the TEC manual and DOE QCI Protocols. These expectations are set forth in subrecipient grants. OEO has issued a VT Wx Program Notice regarding QCI Protocols with signatory requirements of all staff responsible at each agency.

OEO requires that agencies follow the TEC manual (SWS) and all requests to vary from it require an Atypical Waiver to OEO for pre approval. If any waiver is granted, the job must be paid for with state weatherization Funds. These requirements and expectations are relayed and codified each year in the State and DOE Weatherization Grants to subgrantees and a copy is available on request.

The Vermont WAP continues to take full advantage of diagnostic technology. The science of analyzing and retro-fitting residential buildings has developed to the point where strict prescriptive standards are not the most cost-effective approach. It is necessary to utilize weatherization diagnostic technology to select the appropriate set of measures that are tailored to the particular needs of a given building. In order to make an intelligent assessment, energy auditors and crews shall use normalized fuel consumption data, blower doors, flue gas test equipment, CO detectors, combustible gas detectors, differential pressure measurement equipment, client supplied information, infrared cameras, and common sense to analyze buildings. HEAT and the VT Multi Family Audit Tool (aka "Beast") will be used as the analysis tool to help screen the cost effectiveness of individual and aggregate measures on Single Family homes and Multifamily homes. A DOE Approved Mobile Home Priority list and Mobile Home Audit will be used for mobile homes, however, full diagnostics are still necessary by the auditor and crew to provide high quality Wx.

Distribution of Field Guide: OEO keeps the most recent version of the TEC Manual updated on its website. www.dcf.vermont.gov/benefits/weatherization

Allowable Measures:

(1) Air Leakage Control - the utilization of a variety of approved materials that are used to help reduce the infiltration and ex-filtration of air through the building envelope. Pre-and-post blower door test data will be recorded to quantify the overall reductions of air infiltration attributable to the program's efforts.

(i) It is the responsibility of the subgrantees' to assure at the time weatherization work was performed that air leakage reduction and ventilation work does not adversely affect indoor air quality or the combustion and/or venting process of combustion appliances.

(ii) Subgrantees shall use, whenever possible, blower doors to quantify the relative leakiness of homes, reveal the location of leakage areas, and diagnose the potential for negative impacts due to air leakage reduction work.

(2) Heating system efficiency modifications including, but not limited to:

(i) Materials used for heating and cooling system tune-ups, repairs, and modifications that will result in improved energy efficiency (including cleaning chimneys and flues and minor repairs to chimneys and flues):

(ii) Thermostat and control systems including clock thermostats, the relocation of thermostats, and the replacement of ineffective thermostats:

(iii) Devices for modifying flue openings that will increase the energy efficiency of the heating system:

(iv) Electrical or mechanical ignition systems that replace standing gas pilot lights.

(v) Replacement burner, furnaces, or boilers designed to substantially increase the energy efficiency of the heating system.

(vi) Modifications and repairs to forced air and hydronic distribution systems to include: air sealing cold and warm air duct work and plenums: repairing blower chamber doors: balancing the ratio of cold air return to warm air supply, and adding or deleting distribution lines to balance pressures within buildings.

(3) Cost-effective levels of attic, wall, floor, duct insulation and foundation insulation.

(i) Before insulation is added to an attic space thermal bypasses must be sealed.

(ii) To take full advantage of both the conductive and convection reduction capabilities of blown in cellulose insulation the one-hole dense blow method is the preferred procedure.

(iii) Where the heating system is located in the cellar and/or basement, un-insulated floors shall not be insulated.

(4) Water heater and water pipe insulation including modifications to the water temperature, and water flow controls.

(5) The following insulation, energy efficiency devices and technologies:

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- (i) The installation, alteration, and repair of vapor barriers.
- (ii) Items to repair, install, and improve ventilation.
- (iii) Materials used for water heater modifications that will result in improved energy efficiency (including chimney and flue cleaning and minor repairs).
- (iv) Replacement of badly damaged doors.
- (v) Replacement of badly damaged windows.
- (vi) With prior approval from the OEO, movable insulation systems for windows.
- (vii) Interior storm windows when needed.
- ((ix) Energy saving electric baseload measures, cost effective fuel conversions, replacement of inefficient appliances. *
- (x) Other custom measures which prove to be cost-effective over the life of the measure that utilize current DOE approved materials.

* Note: Vermont Weatherization Subgrantees have contracts with Vermont's Efficiency Utility which provides the material and labor dollars for these activities. These contracts allow statewide delivery to qualified low income households of electric baseload measures.

Field guide types approval dates

Single-Family:
Manufactured Housing:
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: 2/4/2020

Audit Procedure: Manufactured Housing
Audit Name: Priority List
Approval Date:

Audit Procedure: Multi-Family
Audit Name:
Approval Date:

Comments

Section 440.14(b)(9)(xi) - Energy Audit Selection

The work done under this award will be done in a manner consistent with the the DOE approved audits and priority list and Appendix A.

Unit Types Audit Procedures and Dates Most Recently Approved by DOE

Single Family: HEAT

Multi-family: VT Multi Family Energy Audit Tool (BEAST). Vermont does less than 5% of its DOE units as Multi Family. Any 5 or more unit building funded by DOE will be sent to DOE for prior approval by the State / OEO.

Mobile Home Approved Mobile Home Audit Procedures Approved and HES Mobile Home Audit were submitted for review and approval March 2022.

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V.5.3 Final Inspection

OEO promotes root cause analysis when providing and promoting quality assurance. Monitoring is not only about fixing the work done improperly at Mrs. Smith's home. Determining what is the root cause of common issues or trends is paramount to quality control and quality assurance. OEO then works with the agencies to address and correct these root causes.

In Vermont, it has been a long standing practice that no dwelling unit is reported to DOE as completed until program operators perform a final quality control inspection of the dwelling unit to certify that all applicable work has been completed in a thorough, professional, competent manner, in accordance with the recommended priorities determined by the energy audit procedures. Every completed unit is inspected by the subgrantees and by a BPI QCI Certified inspector. This requirement is included in the contracts between the OEO and subgrantees.

OEO has a signed agreement between OEO and each subgrantee stating that the subgrantee has read and understands the QCI requirements. This agreement is signed by the local Weatherization Director and certified QCI staff.

If OEO, through its subgrantee monitoring, finds a subgrantee to be passing and reporting jobs as complete that do not meet the standards, then OEO will address this with each agency via its monitoring report and potentially a formal Quality Improvement Plan. An increase in the amount of jobs monitored or an extra monitoring visit can also be done, and has been found to be successful in the past.

The State of Vermont is compliant with the DOE QCI Requirements and strongly believes in the importance of thorough inspections being completed by subgrantees. **The QCI person must not have any oversight responsibility of crew and can not have done any of the work he or she is inspecting.** A detachment of quality and quantity is imperative for high quality work being reported to OEO and DOE every month.

A copy of the Vermont QCI inspection form is attached to the state plan. Each Agency uses this form to inspect every completed unit and each measure must "pass" before it can be reported and invoiced to our State Office.

If via monitoring, OEO identifies that an agency has a Quality Control Inspector who is doing inadequate Final Inspections this will be addressed via the monitoring report and corrective action called for.

OEO has recently hired a new person who will be the the State Monitor and is fully funded by DOE funds. His number one Job Duty is Technical Monitoring of the Weatherization Agencies and will spend at least 1/2 his yearly time (1,040 hours) doing so.

As mentioned earlier, OEO has hired CHP of Virginia to perform Monitoring services for our network. This has allowed a new / different set of eyes to view our work and has brought to our state some new perspectives and recommendations on how we can evolve our program. CHP inspectors are or course be BPI QCI certified.

Currently all of OEO's full time Weatherization staff are QCI certified: Geoff Wilcox, and Gordon Brown are QCI certified and Marc Therrien and Jamie Lewis will be by this summer.

V.6 Weatherization Analysis of Effectiveness

Section 440.14(b)(9)(I) - Performance Analysis

Various spreadsheets are used to track subgrantee achievements throughout the program year as well as the reporting and tracking capabilities in Hancock Energy Software. More detailed analysis of current program operations occurs during regularly scheduled monitoring activities and third party impact evaluations. In analyzing subgrantee performance, program cost effectiveness is also taken into consideration. The current program operators are providing more than satisfactory results. A program evaluation of the Wx Program completed in 2015 showed an average energy savings of 20%, and a survey of completed jobs from last program year PY23 estimated an average savings of approximately 28%. Vermont's most common fuel type is oil which is a bulk delivery fuel and not metered. It is very hard to perform a fuel study in Vermont based on this and the fact that most households use multiple fuel types to heat their homes. OEO continues to hope to perform a full blown fuel study / program evaluation in the future, in the meantime we currently have CHP from Virginia providing third party monitoring activities of all of our subgrantees. They will be providing 2 rounds of monitoring at each agency during the next year. This has already proven to be extremely beneficial.

The State of Vermont uses Hancock Energy Software (HES) for energy auditing and weatherization data management and reporting. OEO uses HES to collect WAP data, compare WAP data and better manage the statewide program, striving for best practice at each WAP. This data and reporting ability has allowed OEO to easily separate the costs of weatherizing single family homes from multi family homes by agency and has allowed OEO to make programmatic changes for its state funded weatherization activities by implementing a flexible job cost average based on the percentage of overall units that are single family vs. mult family (only done with state funds). This policy has ensured better parity and delivery of service to the low income clients in the state.

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For more info our our Flexible Job Cost average (state funds only) please contact Geoff.Wilcox@vermont.gov

V.7 Health and Safety

Weatherization Program Health and Safety Plan

The following is an overview of Vermont's Weatherization Health and Safety Plan. More details can be found in the new Health and Safety Plan Template that is attached to this state plan.

NOTE:** New for PY23. Vermont will no longer be providing a separate Health and Safety Budget for its Agencies. Due to the leveraging of State Wx dollars (outside or not included in the DOE State Plan), this added complexity does not provide any benefit. Health and Safety costs will be paid for with State Weatherization funds. All DOE H and S rules and requirements will be followed and details can be provided on any individual job if requested. This will not affect anything in our Health and Safety Plan, nor what we do, simply who we bill to.

Overview: The content in the health and safety plan below aligns with and is expanded upon in the Vermont Weatherization Technical Policies and Procedures Manual (TEC Manual). The Health and Safety Plan is referenced within each weatherization grant between OEO and five sub-grantees.

The TEC Manual outlines all policies regarding non-energy saving measures, including health and safety classified measures, incidental repair classified measures, and ancillary repair classified measures. Section 4 of the TEC Manual delineates these three measure group classifications in detail and specifies their impact with regards to:

- Implications on and contributions toward the job cost average (jca)
- Budgeting and expenditure limitations at both the program budget and individual project levels
- Measure level screening and savings to investment ratios (SIR's)
- Project level screening and SIRs
- Shaping project deferral decisions and/or referrals to partner programs that serve Vermont families.

VT WAP will ensure that all projects completed during the agreement period are comprehensive in scope, promote healthy and safe living conditions, are completed in a workmanlike manner and that the established JCA limitations will not be exceeded.

Budgeting & Financial Implications of non-energy saving measures:

Job Cost Average (JCA): WAP funded investments in non-energy saving measures classified as incidental repair or ancillary measures shall be included in the makeup of the \$8,009 ACPU / JCA limit. Non-energy saving measures classified as health and safety shall not be included in the makeup of the \$8,009 ACPU limit, but will be charged to leveraged funds.

Expenditure Limitation on Health & Safety Measures: With leveraged funds, not DOE: During the agreement period the health and safety classified WAP investment shall not exceed 20% of the aggregated WAP investments that are included in any budget line item that contribute towards the composition of the JCA.

Maximum Allowable Health & Safety Investments Represented as a Percentage of JCA: NA

Savings to Investment Ratios (SIRs): WAP investments in health and safety classified measures shall not be included in any SIR calculations at a project level or at an individual measure level. Non-energy saving measures that are classified as incidental repair measures or as ancillary repairs (as outlined within Section 4 of the TEC Manual) shall be included in SIR calculation.

Ancillary Repairs: Ancillary repairs shall not be considered Health and Safety Costs. Ancillary Repairs are defined as "Items necessary for the proper installation of weatherization materials. Ancillary items refer to small items such as hardware, nails, screws, other fasteners, adhesive, sealant, etc..." These costs must be associated with a specific energy saving measure and must be included in the SIR calculation of the specific energy saving measure that they are associated with. The individual measure must meet or exceed the minimum SIR established for this agreement period—inclusive of ancillary repair costs—for the work to be performed. A comprehensive list of those measures that shall be classified as Ancillary Repair measures can be found on Section 4: Page 5 of the TEC Manual.

Incidental Repairs: Incidental Repairs shall not be considered Health and Safety Costs. Incidental Repairs are defined as "those repairs necessary for the effective performance or preservation of weatherization materials". These costs must be included in project level SIR calculations. For example, replacing knob and tube wiring is an incidental repair, so the cost of removing knob and tube and rewiring an attic

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so that insulation and air sealing can be done shall be included within the overall cost of a project. The project must meet or exceed the minimum SIR established during this agreement for the work to be performed. A comprehensive list of those measures that shall be classified as Incidental Repair measures can be found on Section 4: Page 4 of the TEC Manual.

Deferral Policy: A decision to defer a prospective weatherization project may become necessary in some cases. Deferral of a job may be necessary in cases where health and safety issues cannot be adequately addressed according to the federal WPN 17-7 and/or if non-energy saving measures necessary for a successful weatherization outcome are not possible to execute in a manner that is compliant with the federal WPN.

The complete set of Deferral Policies and Procedures is codified in the TEC manual and attached to this state plan.

Referral Policy: It is the goal of the VT WAP to provide comprehensive services to every client. If a dwelling unit cannot be thoroughly and safely weatherized and a decision to defer services is needed then attempts should be made to refer a deferred client to other program partners that may be able to help remove identified obstacles to weatherization work.

Information is provided to deferred clients about the USDA Rural Developments' grant and loan programs, Neighborworks of Vermont, and other local or regional programs that may be able to provide assistance that enables comprehensive weatherization work to be performed.

Procedures for Identifying Occupant Health Concerns: The health of building occupants is of the utmost importance to the VT WAP. Health and safety related conditions will be identified and improved whenever possible within the confines of applicable program rules and regulations. Every sub-recipient utilizes an intake form that incorporates questions to prospective clients that are partly intended to pre-screen for substantial health and safety related issues. However, most health and safety concerns are identified during in person assessments of the home (Efficiency Coach visit). Sub-recipient staff engage the client in a dialogue about their home, record information on a client questionnaire and visually inspect the home for potential health and safety issues during their inspection. This is performed by the Efficiency Coaches during the first visit to every clients home and the required Efficiency Coach form is attached.

Any health and safety related hazards identified at the home will be identified and recorded on a hazard assessment form. The client will be informed of any identified issues and is required to sign the form. A copy of the completed and signed form will be provided to the client and a duplicate copy is maintained in the electronic client file. Weatherization work may continue if identified conditions will not prevent the execution of a comprehensive weatherization project or healthy living conditions and it is unlikely that the weatherization work will worsen any of the identified conditions.

Removal and Disposal Considerations:

When amelioration of a health and safety issue requires the removal of a material good, product or appliance, e.g. a red-tagged furnace, then the removal and proper disposal of the item is required. Removal and disposal considerations are allowable portions of a total health and safety measure expense. State and local codes are followed for proper disposal.

Worker and Project Safety, VOSHA, State and Local Codes:

The following rules apply:

- When installing any Health and Safety measure, the sub-recipient and/or their sub-contractor will follow and adhere to all local and state codes.
- The Confined Space Rule is in effect.
- The Vermont Occupational Safety and Health Code VOSHA (Title 21 V.S.A Chapter 3, Sub-Chapters 4 and 5 and their rules are adopted and will be adhered to. The sub-recipient is required to train and educate all employees to these rules and regulations and work in accordance with these rules and regulations.

Technical Excellence Committee (TEC):

OEO staff chair a TEC to develop and maintain technical program policy and standards for the VT WAP. This committee consists of two-three technical staff from each sub-recipient in addition to the OEO staff members and will meet quarterly during this program year.

Enforcement and Compliance with EPA RRP, OSHA, Confined Space rule, etc.: Each sub-recipient is responsible for their respective programs' compliance with applicable codes and regulation. The OEO Energy Services Program Officer and Program Administrator are often at each agency and occasionally will be on site during the weatherization construction process. Regulatory compliance is evaluated during on- site trainings and inspections. Non-compliant work practices will be identified and warnings will be issued. Subsequent violations will result in letters of warning sent to the executive director of the agency.

Roof Repairs/Roof Replacements

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The Vermont WAP, defines a comprehensive roof repair as any roof repair that exceeds a \$1,000.00 total cost.

DOE WAP funds shall be allowed to contribute toward comprehensive roof repair(s) so long as every condition below is met:

(a) the comprehensive roof repair measure(s) are classified as incidental repair measures and therefore factor into the project-level SIR calculation

(b) the project-level SIR shall be 1.0 or greater, inclusive of all DOE WAP funded

incidental repair measure costs

(c) A maximum of 25% of the total comprehensive roof repair costs shall be funded with DOE WAP funding. Other, Non-DOE funding sources shall be used to fund the balance of the cost associated with the completion of the comprehensive roof repair.

If a roof issue would otherwise cause a deferral of a project, Readiness Funds may be used to address the roof and then get the home back in the Weatherization queue.

V.8 Program Management

V.8.1 Overview and Organization

The Vermont Weatherization Program is administered by the Vermont Office of Economic Opportunity. The Vermont Office of Economic Opportunity (OEO) administers federal and state programs which strengthen community capabilities for dealing with the causes and symptoms of poverty, including programs dealing with housing, energy use, and the promotion of self-sufficiency. OEO provides financial and other assistance to community action agencies and other community-based organizations, and serves as a liaison within state government for community action programs. OEO works with the private sector and other groups outside government to eliminate the causes and symptoms of poverty, and to coordinate these efforts with state and community based agencies.

OEO does not expense any administration costs to the DOE Weatherization Grant. In most years, approximately 85% of our total weatherization program funds come from state funding, thus OEO charges its administrative and most personnel costs to the state weatherization funds. The only costs that are charged to the DOE grant, are the salary and fringe of one of our Energy Services Program Officer (state monitor Marc Therrien). OEO will allow subgrantees to charge up to 15% admin to DOE with proper justification being if an agency has a federally approved indirect rate agreement showing admin costs higher than 10%, an agency can charge that rate as long as it does not exceed 15%. OEO has 2 agencies that have a 10% admin rate, and 3 with a 12-13% admin rate.

The following staff are employed by the State of Vermont's Office of Economic Opportunity to administer the VT Weatherization Program.

Chief Administrator: Sarah Phillips

Office Administrator: Kristin Lyons

Weatherization Program Director: Geoff Wilcox

Senior Energy Service Program Officers: Josh Larose, Robert Leuchs

Program Monitors (Energy Services Program Officer): Gordon Brown, Jamie Lewis, Marc Therrien

V.8.2 Administrative Expenditure Limits

10 CFR 440.14(c)(6)(x) - Additional Administrative Fund:

Three of our five subgrantees receive less than \$350,000 per year of DOE funds. Vermont will be compliant with DOE's 15% administrative cap rule. Vermont does not draw any Grantee Admin. funds but passes through to its subgrantees.

For PY23 3 subgrantees (SEVCA, BROCC and CAPSTONE) have Federally Approved Indirect Cost rates. OEO will be allowing those 3 agencies to receive admin funds

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based on their approved indirect rates (each approximately 12.9%). The other 2 agencies will receive a 10% admin. rate. There will be an administrative cap at 15% for each agency regardless of any indirect rate. Each of the 3 agencies indirect rate agreement is based on salaries. For more information, these indirect rate agreements can be provided.

V.8.3 Monitoring Activities

Section 440.12 (b)(6) - Monitoring Plan

The DOE funded "State Energy Services Program Officer" monitors each agency to the specifications documented below, as well as to provide Training and Technical Assistance. An additional Energy Services Program Officer (ESPO and sometimes noted in this state plan as the State Monitor or Monitor) is supported with state funds.

OEO is dedicated to providing a high quality, efficient and cost effective Weatherization Assistance Program. Programmatic monitoring is used to verify subgrantee compliance, communicate state policies to subgrantees, and influence subgrantee's performance. The monitoring staff consists of the Weatherization Program Director and two Energy Services Program Officer's. Technical Monitoring is the number one job duty of the DOE funded state position. At least 1/2 of the FTE and costs for this position is used for Technical Monitoring (2.7% of VT's award is used for Monitoring, another 2.7% for other T and TA activities for a total of 5.4% allocated to 1 FTE Energy Services Program Officer).

To insure the highest quality at all program levels, OEO verifies the contractual obligations of the subgrantees through the monitoring process. This process has allowed for program improvement in a variety of areas. Vermont's WAP monitoring is comprised of four succinct efforts. They are: Administrative Monitoring, Financial Monitoring, Programmatic Monitoring, and Monthly Report Monitoring (desktop). A discussion of these monitoring activities follows.

ADMINISTRATIVE AND FINANCIAL (desktop) MONITORING

Administrative monitoring of each of the five subgrantees are held annually. These reviews are conducted by the DCF Audit Director and the Weatherization Program Director. The primary purpose of these reviews is to ensure regulatory and contractual compliance. Staffing patterns, internal controls, inventory management, procurement, and property management are evaluated during the Administrative Monitoring review, as well as financial management systems.

Monitoring Goals

It is the OEO's goal to provide a complete management and contractual review of each of the subgrantee's offices at least once every program year. Further managerial sessions will be developed if the need is established through any of the three monitoring activities.

Subsequent to the management review, an exit conference will be conducted with the program director, and occasionally the executive director of the subgrantee agency.

Monitoring Instrument

The administrative monitoring tool used by the OEO is attached to the state plan. The instrument has proven to be comprehensive and thorough. The monitoring instrument collects general information about the current subgrantee operations. The instrument also probes specific areas of the subgrantee's operations for additional information. These areas are: cash receipts, interest income, program income, payroll, procurement, inventory control, property/equipment, cash disbursements, subcontracting activities, client files, and staffing characteristics.

PROGRAMMATIC MONITORING

During PY22 Programmatic monitoring has been conducted via a contract with Community Housing Partners as well as by the OEO Weatherization Monitor/Technician (Energy Services Program Officer). This tag team approach to monitoring will continue for PY23. This monitoring process is ongoing and takes place at the OEO offices, the subgrantee offices, and in the field at actual job sites. The programmatic monitoring process is extremely varied. The following narrative documents this process:

The programmatic monitoring process begins with an initial review by the OEO Weatherization Monitor/Technician of an agencies completed units. The Hancock Energy Software Program (HES) allows the OEO Weatherization Monitor to access all specific information concerning any weatherization project via this web based program (completed and in process jobs). With this information the monitor can ascertain all materials installed on a given job, the costs of and the type of measures installed, fuel consumption, results of all diagnostic and health & safety tests prior to conducting any field work. The Monitor/Technician also checks production levels against contractual expectations, reviewing expenditure levels, and identifies specific jobs for on-site inspections during the field portion of the monitoring visit.

The next step to the programmatic monitoring process involves the visit to the subgrantee office(s) covered during the monitoring visit. The subgrantees operate in multi-county service areas. The Monitor/Technician organizes each monitoring visit to facilitate an effective review based upon each subgrantee's individual operations. For instance at NETO the Monitor/Technician may choose to monitor the Newport office during one visit and monitor the St. Johnsbury office during another visit due to the distances between the various field offices.

At the field office level, the programmatic monitoring process begins with a client file review (minimum of 15% of the files for the total produced units for year). Since the client file is a historical record of the entire weatherization process, the Monitor/Technician reviews all the information contained in the file. This review establishes

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that appropriate procedures have been followed concerning: the application and income verification process, the energy audit/diagnostic testing, the selection of measures, the development of the scope of work, the documentation of costs applied to the job, accurate completion of required forms, and that a successful quality control post inspection has performed on each job. This review helps to ensure that all applicable rules, policies, and procedures have been followed in carrying out weatherization activities.

The Monitor/Technician also tracks selected materials secured from the subgrantees warehouses through the inventory records. This verifies the adequacy of those records. It also ensures that federal material specifications are adhered to. Finally, it confirms that materials and costs are properly recorded, charged and reconciled.

The next step to the programmatic monitoring process involves site visits of both completed and in-progress units. This ensures high quality and the highest possible energy savings in each weatherized home. OEO aims to inspect 10% of units on-site. A percentage of the on-site inspections will include work-in-progress jobs. This will allow for crew and Monitor/Technician information exchange and provide T&TA opportunities.

The Monitor/Technician utilizes a full range of diagnostic equipment when inspecting actual dwelling units. Blower doors, infrared scanners, combustion efficiency testers, carbon monoxide detectors, combustible gas detectors, digital manometers and other tools help the Monitor/Technician verify the quality of individual weatherization jobs, insure the safety of the clients, and validate the test results reported in the client files. The inspection covers much more than basic diagnostic testing. The Monitor/Technician inspects all aspects of each job verifying material installations and overall quality. Interviews with clients provide insights into the customer service provided by the subgrantee.

The holistic view of the weatherization job, created during the on-site visit, allows the Monitor/Technician to formulate a retrospective assessment of the measures called for in the initial energy audit. Any deficiencies in the audit can then be discussed with the individual performing the original evaluation. Inspection of the installed measures identifies problems associated with the installers. Often, if installer problems are identified, immediate training can be arranged during an on-site inspection of an in-progress unit. Customer service concerns uncovered during the on-site inspections are issues discussed with the program management staff.

Monitoring reviews result in a performance-based evaluation ensuring that the best set of approved measures were selected and tailored to meet the energy reduction needs of a particular building. Furthermore, subsequent quality control inspections ascertain the energy saving reliability of the installed measures.

Following the on-site inspections, an exit conference will be conducted with the program director, when feasible. A report summarizing findings will be sent to the subgrantee within fifteen days. The report will detail both positive aspects of the program and areas of concern or improvement. Details of deficiencies and proposed corrective actions will be included in the letter. A subgrantee response detailing the corrective action taken or Corrective Action Plan is required within 30 days, and selected jobs are rechecked to ensure that the quality of the work has been corrected. After the response is deemed adequate, OEO will issue a letter indicating that fact. Reports encompassing more than one field office are essentially multiple reports from the OEO's and local program management's perspective.

Programmatic Monitoring Goals

OEO's goal is to review 10% of the total statewide completed units.

In addition to the above, the technician is responsible for a continual review of recent changes in the residential energy conservation technology and presents those findings to appropriate personnel in local and statewide settings.

These resources have enabled the monitoring process to be more than just a quality control review, but also a format for on-site training.

MONTHLY REPORT MONITORING

Hancock Energy Software allows OEO to effectively monitor subgrantee performance from a contractual perspective on a monthly basis. The system is designed to facilitate ad hoc reporting capabilities and allow thorough analysis of current operations.

The grants OEO negotiates and enters into with the subgrantees contain management plans that detail weatherization operations. Integral portions of those grants contain line item Monthly Plan/Cumulative Monthly Plan budgets. The grant plan data provides a base to evaluate the weatherization program operator's performance by comparing actual results achieved to the proposed performance levels contained in the grants.

INTEGRATED MONITORING APPROACH

Administrative Monitoring, Programmatic Monitoring and Monthly Report Monitoring (and data analysis) are integrated as OEO's monitoring program. The underlying intent is to utilize all three efforts to promote a high quality program that delivers cost effective services, meets the needs of Vermont's low income population, and ensures compliance with Federal and State requirements.

DOE Annual Grant Administrative funds are not used by the State of Vermont. State funds are used to monitor each agency to the standards mentioned above (both state and federally funded projects). Both State and Federal funded projects result in the same Wx product and can't be distinguished other than by funding source (except for a few rare exceptions).

Agencies that have been identified to need more frequent visits and monitoring and assistance are given this assistance to the degree needed.

A Corrective Action Plan / enhanced monitoring and oversight such as those conducted at an agency a few years ago is identified by successive poor monitorings and client complaints to OEO. Being a small state, OEO is in touch with each agency weekly or bi weekly at the longest. This close working relationship is beneficial as it allows the OEO to know fairly soon when things have gone south and need correction.

In conjunction with the yearly Administrative Monitoring conducted by OEO, the DCF Audit Director monitors each agency's administrative and financial office. At this

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time, the agencies yearly financial audit is reviewed.

A percentage of the State's T and TA funds will be used for state personnel (ESPO) to monitor and provide technical assistance to work funded by the DOE Annual Grant. State funds will also be used to train and monitor the DOE funds.

V.8.4 Training and Technical Assistance Approach and Activities

Section 440.12(b)(7) - Training and Technical Assistance

Update on Training Plan and Training Program for PY 23

OEO does not use any DOE funding to pay for VT WAP Network Training. Each agency does receive \$10,000 each of DOE T and TA funding via their DOE Weatherization Grant. These funds are intended to help cover some of their training costs to attend OEO sponsored or approved trainings and approved conferences (salary and fringe for attendees for the days attending). The Agencies receive approximately \$150,000 or more of State Funded T and TA funds to cover most of their Training Needs. Use of DOE T and TA funds by an agency requires prior approval by OEO.

OEO has 3 contracts in place to provide training and technical assistance to its VT Program. Contracts have been issued to three different entities to provide 1. State wide Crew Trainer. 2. Auditor and QCI Trainer. and 3. State Monitoring and Quality Assurance. These activities have occurred during PY 22 and will continue during PY23. All are paid with State Weatherization Funds.

1. Crew Training: 150 training days This contract allows for 150 training days by Bill Hulstrunk, one of THE national experts on blowing insulation and building science and was a previous VT WAP Director for many years. OEO helps plan and oversee this training of the 5 Agencies. The goal is to provide trainings in a manner that least disrupts production but that also ensures the work is being done properly and achieves the desired results. More details can be provided when they are worked out.

2. Auditor and QCI Training: A contract for 50-75 training days has been awarded to Dave Keefe, to provide Auditor and QCI Training. This trainer is also a nationally known Weatherization expert and professional trainer. More details to be provided on course objectives, etc.

3. Programmatic Monitoring: A contract has been awarded to CHP of Virginia to provide State Monitoring services of all 5 Agencies. One round of monitoring at each agency has been completed so far, and another round will complete next year. Details and monitoring reports also can be provided.

All of these contracts will be non DOE Funded, but will significantly benefit the DOE Weatherization work that we provide for all our clients this year.

OEO has been awarded an Energy and Innovation grant to plan and start up a VT Weatherization Training Center. The Steering committee for this has recently begun meeting.

General Notes on T and TA in VT WAP:

- Typically attendance at trainings is mandatory for applicable agency staff.
- Agency reporting and spending and monitoring results of all 5 Agencies are compared and evaluated and from which trainings and OEO assistance are determined as a result. Hancock Energy allows us to run many reports which provide program metrics that are used for this evaluation and determination as well.

OEO Weatherization staff are frequently out at the 5 local VT Weatherization Programs providing hands on Training and Technical Assistance. Please see the T and TA Visit spreadsheet attached to the SF 424 which lists the visits during the past year.

DOE Training and Technical Assistance funds will be used again to fund one of the two Energy Services Program Officers. This equates to 5% of the total funds, and will be used for monitoring and providing direct training and technical assistance to OEO's subgrantees / agencies.

Training and technical assistance activities in the State of Vermont are designed to keep the grantee and subgrantees abreast of new weatherization techniques and methodologies. It is used to enhance organizational and management skills and ensure all staff excel at core competencies in their work.

The goal of the training and technical assistance program is to demonstrate advances in building diagnostic techniques and retrofit procedures; solve individual program's management and/or technical problems; and provide an incentive for subgrantees to try new technical and management approaches to resolve various local challenges.

Trainings will be presented in a variety of formats depending on the subject (i.e., lecture, small group discussion, handouts, guest speakers, etc.). The technical component will be heavily dependent upon hands-on training at the local level on the job site.

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OEO requires training for all subgrantee staff including crew members. Thus, training in Vermont is all inclusive and is an attempt to ensure "no findings" monitoring reports; the highest quality of work possible; and increased efficiency and productivity at all levels. Vermont utilizes a variety of methods to assess the training needs of the subgrantee and grantee staff to include: monitoring, both programmatic and administrative; monthly production reports; technical innovations; and input from all weatherization personnel. OEO will assess the effectiveness of training sessions by use of class evaluations and by field implementation of training objectives.

Finally, OEO's Monitor / Energy Services Program Officer is an instrumental component of OEO's overall training program. Not only is the Monitor/Technician provided with as much state of the art training as possible, he or she works to ensure the latest technologies and findings are provided as trainings through in house coordination and procurement of Expert Trainers. The ESPO / Monitor/Technician supplements formal training programs during on-site visits with crews and auditors. These visits not only ensure best practices, they identify and inform overall training needs for OEO's Weatherization Program.

Client Education: Client education is considered an integral and important part of the Wx process in the Vermont Weatherization Program. Every client that receives weatherization service (both DOE and State Funded) will first receive a separate visit from an agencies Efficiency Coach. This visit is funded by state weatherization funds. It will include enhanced client education, referral to other state and local programs (via our award winning One Touch Referral Program), Efficiency Vermont electrical efficiency measures, as well as discussion and explanation of the weatherization process and what the client can do to get the most out of the weatherization process and service.

Development of T and TA Activities: As mentioned, T and TA activities are determined in a multiple of ways. Frequent onsite visits allow OEO to see first hand the strengths of each agency and the areas in need of improvement. OEO shares best practices amongst the agencies and develops trainings to further the mission of creating a statewide "best practice" weatherization program.

Monthly review of agency reporting and results also can help identify measures and areas where agencies are excelling and where they may be struggling. This also helps identify what trainings are needed. And again, the implementation of HES as the state wide Data Management and Audit tool has allowed and will continue to only provide greater side by side evaluation of agencies and comparisons.

QCI Policy: The State of Vermont is compliant with DOE's QCI requirements.

Certifications: The State of Vermont endorses and supports BPI certifications and the majority of the energy auditors in the network are BPI certified. Certification is only a requirement for Quality Control Inspectors and VT is compliant with DOE's requirement for all projects to be inspected by an individual with this certification. Agencies will hire an individual who is not certified but will train them on the job, then formal training and certification (for QCI) within 6 months of hiring and before that individual performs Quality Control Inspections.

Percent of overall trainings

Comprehensive Trainings:	<input type="text" value="0.0"/>
Specific Trainings:	<input type="text" value="100.0"/>

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	<input type="text" value="50.0"/>
Percent of budget allocated to Crew/Installer trainings:	<input type="text" value="50.0"/>
Percent of budget allocated to Management/Financial trainings:	<input type="text" value="0.0"/>

V.9 Energy Crisis and Disaster Plan

Vermont Wx does not have an energy crisis plan for DOE funds. State Wx funds will be used for energy crisis situations.