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U.S. Department of Energy

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Weatherization Assistance Program for  
Low-Income Persons

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APPLICATION INSTRUCTIONS

U.S. Department of Energy  
Office of State and Community Energy Programs  
1000 Independence Avenue, SW  
Washington, DC 20585

November 2023

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#### Federal Regulations

- [Weatherization Assistance Program for Low Income Persons - 10 Code of Federal Regulations \(CFR\) 440](#)
- [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
- [DOE Implementing Order - 10 CFR 1005](#)
- [DOE Federal Assistance Reporting](#)
- [Executive Order 12372 - Intergovernmental Review of Federal Programs](#)
- [2 CFR 200 Subpart D—Post Federal Award Requirements](#)
- [2 CFR 200 Subpart E – Cost Principles](#)
- [2 CFR 200 Subpart F – Audit Requirements](#)
- [10 CFR Part 1021 – National Environmental Policy Act Implementing Procedures](#)
- Federal Register - [Multifamily 50% threshold - 65 Fed. Reg. 77210, Dec. 8, 2000, Preamble](#)
- [Build America, Buy America](#)
- [Department of the Interior and Related Agencies Appropriations Bill. 1985 – House Report 98-886](#)
- [Federal Register Notice, 45 Fed. Reg. 13028, 13031, Feb. 27, 1980](#)
- [Social Security Act, Pub.L. No. 88-452, 42 U.S.C. Ch. 7](#)
- [State Energy Efficiency Program Improvement Act of 1990 \(SEEPIA\) Public Law 101-440](#)

#### Program Guidance

- [Weatherization Program Notices and Memorandums](#)
- [Appendix A](#)

#### Application Forms

- Administrative and Legal Requirements Document (ALRD)
- Performance and Accountability for Grants in Energy ([PAGE](#))
  - Standard Form 424 (SF-424) – Instructions
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  - Quarterly Reporting:
    - Federal Financial Status Report Standard Form 425
    - Performance Report
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    - Historic Preservation Report

#### Additional Resources

- [A Guide for State and Local Government Agencies: Cost Principles and Procedures for Establishing Cost Allocation Plans and Indirect Cost Rates for Grants and Contracts with the Federal Government](#)
- American Society of Heating Refrigeration and Air-conditioning Engineers (ASHRAE) 62.2-2016 "Ventilation and Acceptable Indoor Air Quality in Residential Low-Rise Buildings" Standard
- [Historic Preservation - Executed Programmatic Agreements](#)

## List of Acronyms

<b>ACPU</b> – Average Cost per Dwelling Unit	<b>NASCSP</b> – National Association for State Community Services Programs
<b>ALRD</b> – Administrative and Legal Requirements Document	<b>NCAP</b> – National Community Action Partnership
<b>ASAP</b> – Automated Standard Application for Payment System	<b>NEPA</b> – National Environmental Policy Act
<b>BABA</b> – Build America Buy America	<b>MF</b> – Multifamily
<b>BIL</b> – Bipartisan Infrastructure Law (Infrastructure Investment and Jobs Act)	<b>OMB</b> – Office of Management and Budget
<b>BPI</b> – Building Performance Institute	<b>OSHA</b> – Occupational Safety and Health Administration
<b>BPA</b> – Building Performance Association	<b>PA</b> – Programmatic Agreement
<b>CAA</b> – Community Action Agency	<b>PAC</b> – Policy Advisory Council
<b>CFR</b> – Code of Federal Regulations	<b>PAGE</b> – Performance and Accountability for Grants in Energy
<b>CO</b> – Contracting Officer	<b>PO</b> – Project Officer
<b>CSPP</b> – Community Scale Pilot Project	<b>POI</b> – Pollution Occurrence Insurance
<b>DOE</b> – U.S. Department of Energy	<b>PTE</b> – Pass-through Entity
<b>E&amp;I</b> – Enhancement and Innovation	<b>PVE</b> – Petroleum Violation Escrow
<b>ECM</b> – Energy Conservation Measure	<b>PY</b> – Program Year
<b>EPA</b> – U.S. Environmental Protection Agency	<b>QPR</b> – Quarterly Performance Reports
<b>EOW</b> – Energy OutWest	<b>QCI</b> – Quality Control Inspector
<b>FAO</b> – Financial Assistance Office	<b>SAM</b> – System for Awards Management
<b>GAO</b> – General Accounting Office	<b>SEEPPIA</b> – State Energy Efficiency Program Improvement Act of 1990
<b>GMS</b> – DOE Grants Management Specialist	<b>SERC</b> – Sustainable Energy Resources for Consumers
<b>H&amp;S</b> – Health & Safety	<b>SIR</b> – Savings-to-Investment Ratio
<b>HHS</b> – U.S. Department of Health and Human Services	<b>SWS</b> – Standard Work Specifications
<b>HUD</b> – U.S. Department of Housing and Urban Development	<b>T&amp;TA</b> – Training and Technical Assistance
<b>ICR</b> – Information Collection Request	<b>UEI</b> – Unique Entity Identifier
<b>IG</b> – Inspector General	<b>WAP</b> – Weatherization Assistance Program
<b>IRM</b> – Incidental Repair Measure	<b>WPN</b> – Weatherization Program Notice
<b>LIHEAP</b> – Low Income Home Energy Assistance Program	<b>WRF</b> – Weatherization Readiness Fund

## Federal Rules and Regulations

### **PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS**

The Uniform Administrative Requirements found at [2 CFR 200](#) establish uniform policies and procedures for the award and administration of U.S. Department of Energy (DOE) grants and subawards.

#### **Cost Principles**

Allowability of costs shall be determined in accordance with the cost principles applicable to the entity incurring the costs. Thus, allowability of costs incurred by state, local or federally recognized Tribal governments, and nonprofits, is determined in accordance with the provisions of [2 CFR 200 Subpart E - Cost Principles](#).

#### **Basic Guidelines for Costs**

- Costs are allowable if they are necessary and reasonable, not prohibited under state or local laws, conform to laws and regulations, given consistent treatment, comply with generally accepted accounting principles, and are not included as a cost under other federal programs.
- Allocations of costs must be in proportion to the benefits received, cannot be shifted to overcome deficiencies in other programs, and must be supported by a cost allocation plan.
- Applicable credits shall be used to reduce expenditures applicable to a given grant.
- The total cost of a grant program includes the allowable direct and allowable indirect costs less applicable credits.
- To the extent available, Grantees and Subgrantees must use funds available from credits including but not limited to program income, rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds, before requesting additional cash payments (e.g., credits must be used first prior to drawing down additional funds).

#### **Indirect Costs (where applicable)**

- Grantees: All indirect costs must be negotiated with a cognizant federal agency. A cognizant federal agency is responsible for negotiating and approving indirect cost rates on behalf of all federal agencies that award grants and contracts to an organization.
- Subgrantees: An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government. If no approved rate exists, the pass-through entity must determine the appropriate rate in collaboration with the subrecipient, which is either:
  - The negotiated indirect cost rate between the pass-through entity and the subrecipient; which can be based on a prior negotiated rate between a different PTE and the same subrecipient,
  - Or the de minimis indirect cost rate.

**Cost Allocation Plan**

Information regarding State/Local-Wide Central Service Cost Allocation Plans are found in [2 CFR 200.416](#) and [2 CFR 200 Appendix V](#).

**Allowability of Selected Items of Cost**

In examining selected items of cost, [2 CFR 200 Subpart E, “Cost Principles”](#) and in particular, [2 CFR 200.403](#) and [2 CFR 200.420](#) to [2 CFR 200.475](#), provide principles to be applied in establishing the allowability of certain items of cost. These principles apply whether a cost is treated as direct or indirect. Failure to mention a particular item of cost is not intended to imply that it is unallowable; rather, determination as to allowability in each case should be based on the treatment or principles provided for similar or related items of cost.

**Financial Audits**

Grantees must comply with the requirements of [2 CFR 200 Subpart F - Audit Requirements](#).

The [2 CFR 200 Subpart F](#) audit threshold is \$750,000 of annual federal award expenditures. All non-federal entities that expend \$750,000 or more in a year in federal award funds shall have a single or program-specific audit conducted for that year in accordance with the provisions of [2 CFR 200](#). The \$750,000 federal funds threshold includes funds from all federal agencies. For purposes of the single-audit, Petroleum Violation Escrow (PVE) funds are not treated as federal or appropriated funds. Subgrantees that spend less than \$750,000 are no longer required to have a single audit. Per [2 CFR 200.425](#), pass through entities (Grantees) are prohibited from charging federal awards the costs of single audits for such Subgrantees. Grantees may not budget for audits of Subgrantees receiving less than \$750,000 of federal funds. Pass through entities (Grantees) are held responsible for federal awards administered by their Subgrantees and will need to review their overall Subgrantees monitoring process to determine if they need additional monitoring procedures to ensure Subgrantee compliance.

Grantees must include the following affirmative statement or similar verbiage in their Financial Audit budget justification section or in section IV.7 Miscellaneous of the Annual File: “In accordance with 2 CFR 200.425(a)(2), only those Subgrantees expending more than \$750,000 in total federal funding annually will receive FINANCIAL AUDITS funding identified in the Grantee's SF-424a Budget.”

Entities that expend less than \$750,000 a year in federal awards are exempt from federal audit requirements for that year except as noted in [2 CFR 200 Subpart F](#), but records must be available for review or audit by appropriate officials of the federal agency, pass-through entity, and General Accounting Office (GAO). Grantees that expend more than \$50 million a year in federal awards will be assigned a cognizant agency. Grantees that expend \$50 million or less will be assigned to an oversight agency. Both cognizant and oversight agencies will be reassigned every 5 years (per [2 CFR 200.513](#) detailed requirements) and will be the federal agency that provides the predominance of federal funding in the reassignment year.

**NOTE: A State Auditor’s Report alone is not the same as the federally required State Single Audit report ([2 CFR 200.512 section \(c\)](#)) and will not satisfy this requirement.**

## I. OVERVIEW

### I.1 Introduction

The Application Instructions are to be used by all states, territories, and Indian Tribes (and local organizations, if applicable) when applying for direct grants under WAP, administered by DOE's Office of State and Community Energy Programs (SCEP). Grantees must comply with applicable law including regulations contained in [10 CFR 440](#), [2 CFR 200](#), and other procedures applicable to these regulations as DOE may, from time to time, prescribe for the administration of financial assistance. Any potential discrepancies between information contained in this document and [2 CFR 200](#) regulations shall be resolved in favor of [2 CFR 200](#).

In the development, submission, and review of grant applications, the provisions of [Executive Order 12372](#) (Intergovernmental Review of Federal Programs) and the DOE Implementing Order ([10 CFR 1005](#)) remain unchanged.

To ensure public involvement and obtain timely suggestions in developing their WAP Grantee Plan Application, DOE requires a formal public hearing on the completed final draft Grantee Plan Application ([10 CFR 440.14\(a\)](#)) and urges Grantees to hold a meeting with their network at the beginning of the planning process and a meeting with their Policy Advisory Council (PAC). In addition, DOE urges Grantees to regularly consult with their Subgrantees throughout each Program Year (PY) to improve WAP and the annual Grantee Plan.

Applications **must be** submitted through the **Performance and Accountability for Grants in Energy (PAGE)** online system to be considered for an award. If you have questions regarding the Application Instructions in PAGE, please refer to the Help Menu or contact the PAGE hotline at [PAGE-Hotline@ee.doe.gov](mailto:PAGE-Hotline@ee.doe.gov) or 1-866-492-4546.

**Table 1: Application Package Documentation contains a complete list of Application sections. Mandatory sections must be completed in their entirety. Complete data and information will expedite review and award. The Grantee must notify the DOE Programmatic Project Officer (PO) upon submission of the Grantee Plan Application in PAGE. If sufficient progress to negotiate the final Grantee Plan Application is not being made, DOE reserves the right to withhold recipient funds drawn from the Automated Standard Application for Payments (ASAP) System. DOE does not guarantee or assume any obligation to reimburse costs incurred in the performance of the agreement if the award is not approved.**

*For all supporting documents (uploaded as PDFs) that are attached to the SF-424 Application in PAGE, Grantees are requested to use the naming conventions used in Table 1 (i.e., the "Suggested File Name") or similar file names, to enable DOE reviewers to quickly identify the contents of attached documents.*

**SF-LLL Disclosure of Lobbying Activities**

Grantees must not use any federally appropriated funds for lobbying activities. If funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, Member of Congress, officer or employee of Congress, or employee of a Member of Congress in connection with the grant/cooperative agreement, the Grantee must complete and submit ["Standard Form - LLL, "Disclosure Form to Report Lobbying."](#)

*Grantees should not include tables or spreadsheets within the Annual and Master Files or in the comments section of the SF-424A Budget. All documents (i.e., Word, Excel, PDF) must be ATTACHED to the SF-424. PDF is recommended in most instances.*

<b>Table 1: State Plan Application Documentation</b>		
<b>Name of Document</b>	<b>Format</b>	<b>Recommended File Name</b>
<b>Mandatory Sections</b>		
SF-424 Application for Federal Assistance	PAGE	N/A
SF-424A Budget Information for Non-Construction Programs	PAGE	N/A
Budget Justification	PAGE	N/A
Annual File	PAGE	N/A
Master File	PAGE	N/A
<b>Required Attachments to the Application Package in PAGE (SF-424)</b>		
Carryover Explanation (if applicable)	Attachment	Carryover Explanation
Health and Safety Plan (if not already included in the Master File)	Attachment	Health and Safety Plan
Training & Technical Assistance (T&TA) Plan (if not already included in the Master File)	Attachment	T&TA Plan
Quality Control Inspection/ Technical Monitoring Form	Attachment	QCI_TMF
Financial/Programmatic Monitoring Tool	Attachment	Financial Programmatic Monitoring Tool
Quality Control Inspector (QCI) Technical Monitor(s) Certification Form(s) or documentation for how this requirement is met	Attachment	QCI Certifications
Public Hearing Transcript(s)	Attachment	Public Hearing Transcript
Public Hearing Notice(s) Demonstrating Minimum 10 Days' Notice	Attachment	Public Hearing Notice(s)
PAC Activity Documentation	Attachment	PAC Activity Documentation
Indirect Rate Agreement (if applicable)	Attachment	Indirect Rate Agreement
Explanation of Indirect Costs (if applicable)	Attachment	Indirect Cost Explanation



Cost Allocation Plan (if applicable)	Attachment	Cost Allocation Plan
2 CFR 200 Subpart F, Single Audit	Attachment (or provide a link in the narrative comment section of the budget)	Single Audit
SF-LLL Disclosure of Lobbying Activities (if applicable)	Attachment	SF-LLL
<b>Other Optional Attachments, as applicable</b>		
WAP Organizational Chart(s)	Attachment	WAP Org Chart
Corrective Action/Removal Procedures	Attachment	Corrective Action Removal Procedures
Approved Sustainable Energy Resources for Consumers (SERC) Plan, if applicable	Attachment	SERC Plan

**DOE reserves the right to request additional or clarifying information.**

## II. APPLICATION FOR FEDERAL ASSISTANCE - STANDARD FORM 424

A completed and signed Standard Form 424 (SF-424) is required from each agency applying for federal funding under DOE's WAP. Please note that SF-424 is required when applying for new or continuation funding allocations (federal and non-federal) or when modifying the performance period start and/or end dates of the grant. The SF-424 is not required for budget or scope modifications that do not change the overall budget. When starting to complete the SF-424 form in PAGE for PY 2024, please select "Continuation" under Field 2 - Type of Application.

<b>1. Type of Submission:</b>	<b>2. Type of Application:</b>	*If Revision select appropriate letter: *Other (specify):
<input type="checkbox"/> Preapplication	<input type="checkbox"/> New	
<input checked="" type="checkbox"/> Application	<input checked="" type="checkbox"/> Continuation	
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	

Figure 1: Standard Form (SF-424) Type of Application

The list of certifications and assurances for Field 21 can be found on the DOE Financial Assistance Forms Page: <http://energy.gov/management/downloads/certifications-and-assurances-use-sf-424>.

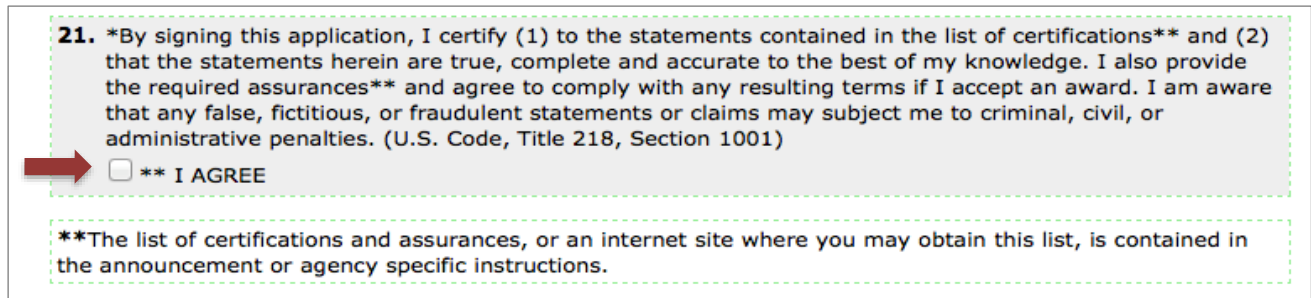
For the rest of the SF-424 fields, please refer to following guidance:

- Field 3 – Date Received: Enter in the date.
- Field 4 – Applicant Identifier: Please leave blank.
- Field 5a – Fed Entity Identifier: Leave blank.
- Field 5b – Federal Award Identifier: Prepopulated with the assigned grant number.
- Field 6 and 7 – For state use only.
- Field 8a - f – Applicant Information: Please make sure you enter in accurate information, especially the employer tax identification number and Unique Entity Identifier (UEI).
- Field 9 – Type of Applicant: Select the correct applicant type to identify your organization.
- Field 10 – Name of Federal Agency: Insert Department of Energy.
- Field 11 – Assistance Listings formerly Catalog of Federal Domestic Assistance (CFDA) as of November 10, 2020, Number: Insert 81.042 – Weatherization Assistance for Low-Income Persons.
- Field 12 – Funding Opportunity Number: Insert number.
- Field 13 – Competition Identification Number: Not applicable.
- Field 14 – Areas Affected by Project (cities, counties, states, etc.): Identify and describe the areas that will be served.
- Field 15 – Descriptive Title of Applicant's Project: Provide a short overview of the scope of the work.
- Field 16 – Congressional Districts of:
  - A) Applicant: Identify the congressional district.
  - B) Program/Project: Identify the state and the congressional district or statewide coverage.
- Field 17 – Proposed Project: Please remember to update the period of performance dates and they follow your start date (April 1 or July 1).
- Field 18 – Estimated Funding (\$): Prepopulated by PAGE from the budget section.

- Field 19 – Is Application Subject to Review by State Under Executive Order 12372 Process? Select the answer that is applicable.
- Field 20 – Is the Applicant Delinquent on Any Federal Debt? If the answer is yes, then provide explanation in an attachment.
- Field 21 – Has the Grantee reviewed the [list of certifications and assurances](#) for Field 21?

Only new funding allocations for the current year, and other current funding sources (if applicable), should be identified in Field 18 – Estimated Funding. **Do not include any carryover funds in Field 18 or elsewhere within the SF-424 Application. Carryover funds may not be transferred from other awards.** Please review the [complete SF-424 instructions](#) for more information.

DOE requires Grantees to check the “\*\*I AGREE” box in Field 21 in PAGE (Figure 2) to comply with the certifications and assurances. Grantees are *not required* to submit hard copies of documents.



**21.** \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

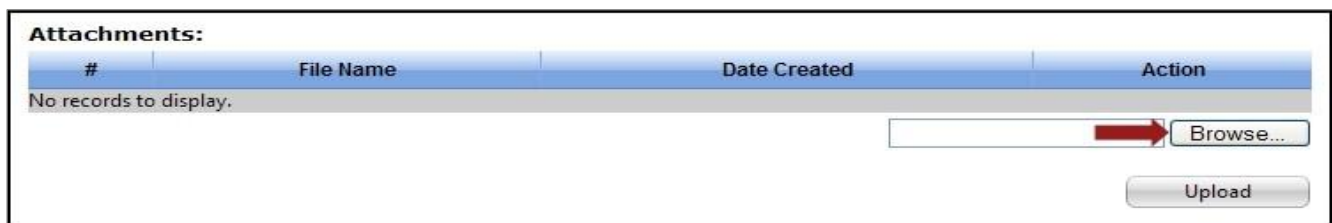
\*\* I AGREE

\*\*The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Figure 2: Standard Form (SF-424) Agreement on Certifications and Assurances

**INSTRUCTIONS TO ATTACH FILES:**

All supporting documentation should be added as attachments to the SF-424. To attach a document, go to the attachments section at the bottom of the SF-424 and click on the **Browse** button (Figure 3). Find the file you want to upload and click the **Open** button. Click the **Upload** button to attach the file to the application. When you have completed the upload process, click **Save**.



#	File Name	Date Created	Action
No records to display.			

Figure 3: Standard Form (SF-424) Attachments

### III. BUDGET

Two budget forms, the Standard Form 424A (SF-424A) and the Budget Justification, work with one another to provide DOE a clear understanding of how the Grantee is proposing to use funds following the DOE rules and regulations. Figure 4 depicts the relationship between the sections of the SF-424A and how that information flows into the Budget Justification.

#### *SF-424A Sections*

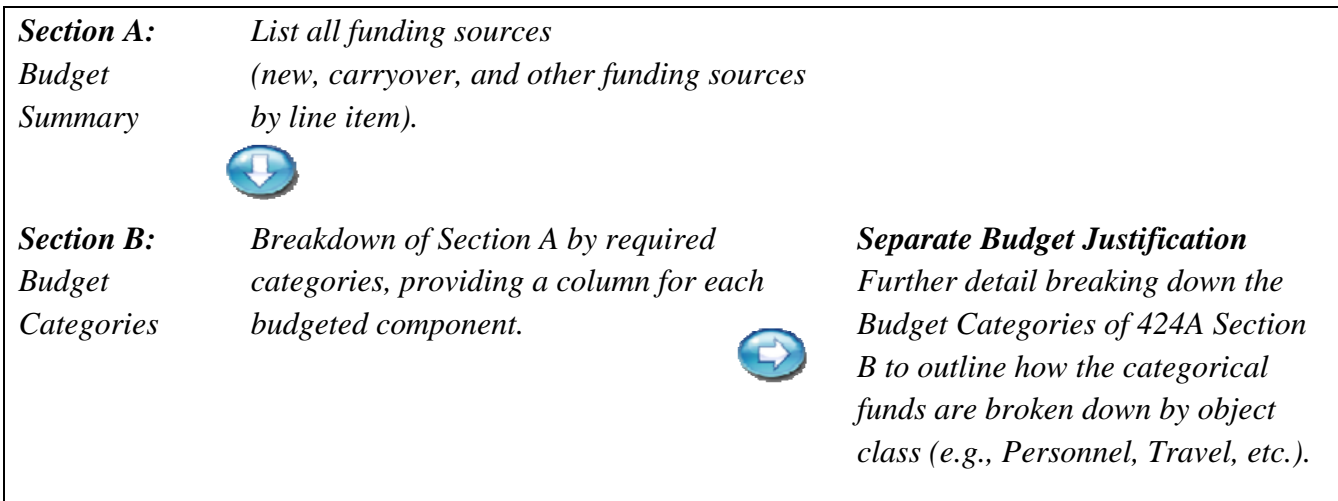


Figure 4: Relationship between SF-424 and Budget Justification

**DOE encourages Grantees to fully utilize DOE funding in the PY it is awarded to maximize the opportunity of achieving the Weatherization mission.**

**New funds:** Any funds being added to the award in a PY are new funds, whether DOE or non-DOE.

**Carryover:** Any funds in the award that are not expended by the end of the PY are **carryover funds**. Grantees shall reasonably project unexpended balances by Budget Category (matching the total sum carryover from all previous years) and provide reasoning for why the funds are unlikely to be used by the end of the PY. Grantees planning to carryover unused funds from any Budget Category (e.g., training and technical assistance (T&TA) funds) from one PY to another must return these monies to the Program Operations budget category and use them to weatherize additional homes unless the Grantee can justify to the DOE Project Officer (PO) the necessity to carryover these funds into the new PY and that they retain the original budget categorization.

If a Grantee has been awarded SERC grants or Community Scale Pilot Program (CSPP) grants in PY 2023, these funds follow annual formula WAP carryover rules. These funds may be carried over from the prior year into PY 2024. Grantees should use the carryover worksheet that will be provided by their DOE POs and utilize the appropriate budget categories in their PY 2024 budget.

Following the first year of a grant award and each subsequent year of a grant award, Grantees with carryover (non-expended funds) shall provide one document with the following information as an attachment to the SF-424 Application in PAGE:

- Breakout of cost categories for total carryover for all prior years and current active year (should equal total carryover amount in the proposed budget for the new PY).
- Breakout of cost categories for total carryover amount in the proposed budget for the new PY.
- Reason for the carryover amount and justification for the reallocated carryover amount.
- If a Grantee has been awarded SERC or CSPP in PY 2023, these funds follow annual formula WAP carryover rules. These funds may be carried over from the prior year into PY 2024. Grantees should use the carryover worksheet for these funds, as well.

<b>Table 2: Carryover Example</b>		
<b>Grantee Name, Grant Number, Current Program Year, Proposed PY</b>		
<b>BUDGET COLUMN HEADING</b>	<b>TOTAL PRIOR YEAR &amp; CURRENT ACTIVE YEAR CARRYOVER (Identify the Cost Categories you are moving the funds from)</b>	<b>PROPOSED BUDGET CARRYOVER (Identify the Cost Categories that you are moving the funds to in the proposed budget for the new PY)</b>
Grantee Administration	\$20,000	\$20,000
Subgrantee Administration	\$9,500	\$7,000
Grantee T&TA	\$14,000	\$0
Subgrantee T&TA	\$11,000	\$0
Program Operations	\$35,000	\$64,000
Health & Safety	\$10,000	\$9,000
Financial Audits	\$500	\$0
Liability Insurance	\$0	\$0
Weatherization Readiness	\$0	\$0
<b>Grantee Formula Carryover Subtotal:</b>	<b>\$34,000</b>	<b>\$20,000</b>
<b>Subgrantee Formula Carryover Subtotal:</b>	<b>\$66,000</b>	<b>\$80,000</b>
CSPP Grantee Administration	\$0	\$0
CSPP Subgrantee Administration	\$0	\$0
CSPP Program Operations*	\$0	\$0
CSPP Health & Safety*	\$0	\$0
<b>Total Formula + CSPP carryover subtotal:</b>	<b>\$100,000</b>	<b>\$100,000</b>

SERC Grantee Administration*	\$20,000	\$0
SERC Subgrantee Administration*	\$0	\$20,000
SERC Program Operations*	\$50,000	\$60,000
SERC Health & Safety*	\$10,000	\$0
<b>Total SERC carryover:</b>	<b>\$80,000</b>	<b>\$80,000</b>
<b>Total Carryover – Formula + CSPP + SERC</b>	<b>\$180,000</b>	<b>\$180,000</b>

*\*These budget categories are for those Grantees who received a SERC or CSPP award.*

**Reason for carryover amount:** The \$20,000 state database upgrade budgeted under Grantee Administration was delayed for several months and will be completed in the next PY. Subgrantee Administration results from a local agency manager leaving. All T&TA goals were met with fewer resources than budgeted. Production at two local agencies was affected by job changes, thus leaving \$35,000 unspent in Program Operations and \$10,000 in Health & Safety (H&S). Due to a slower ramp up than expected, had \$80,000 in unspent SERC funds.

**Justification for carryover amount:** The Grantee requests \$20,000 in Grantee Administration to complete database upgrade as previously proposed. \$7,000 returned to Subgrantee Administration to complete the remaining work. \$25,000 in T&TA and \$500 from Financial Audits carryover moved to Program Operations to complete more homes. Based on the Grantee expenditure limit identified in [Weatherization Program Notice \(WPN\) 22-7](#), the proposed H&S amount was adjusted to reflect the proposed remaining Program Operations funding. \$20,000 of SERC Grantee Administration moved to SERC Subgrantee Administration to assist in completing work. \$10,000 of SERC Health & Safety moved to SERC Program Operations to complete more projects.

Optional Subgrantee Allocation Breakout - Additional 5% of Administration Cost Pool Calculation for Subgrantees with new PY allocations of less than \$350,000:

Subgrantees As Listed in PY 2024 Single-Year Application (Annual File, Section IV.1)	Total Subgrantee Allocations From PY 2024 Annual File, Section IV.1	* Subgrantee Allocations - Carryover of Prior Year(s) Grant Funds to Subgrantees	Subgrantee Allocations - PY 2024 "New" Formula Award Funds Only	*Subgrantee SERC Carryover (SERC and/or CSPP funds should separate and not be included in the Total Subgrantee Allocations)
Subgrantee A	\$236,072	\$14,945	\$221,127	
Subgrantee B	\$453,377	\$38,417	\$414,960	

Subgrantee C	\$675,386	\$36,156	\$639,230	
Subgrantee D	\$500,432	\$55,342	\$445,090	
Subgrantee E	\$855,997	\$90,420	\$765,577	\$35,000
Subgrantee F	\$418,143	\$0	\$418,143	
Subgrantee G	\$350,969	\$61,253	\$289,716	
Subgrantee H	\$898,824	\$0	\$898,824	
<b>Total</b>	<b>\$4,389,200</b>	<b>\$296,533</b>	<b>\$4,092,667</b>	<b>\$35,000</b>

\* Subgrantee carryover subtotal in proposed allocations must correspond to Subgrantee carryover in the "Carryover Explanation – Overall."

Subtotal of Subgrantee Allocations <\$350,000 Formula Award Funds Only:

\$221,127 (Subgrantee A)

\$289,716 (Subgrantee G)

\$510,843 x .05 = **\$25,542**

### III.1 SF-424A Budget Preparation

The SF-424A Budget shall be prepared, identifying the total amount of new funding allocations and other funding sources, for the current budget period. For this purpose, please complete the SF-424A **in whole dollars**. The SF-424A Budget can be found in PAGE after beginning a Grant Application Package.

The proposed budget costs are estimated values and **invoicing must be calculated from actual costs incurred for each of the cost categories**. Federal payments to a Grantee's "contingency reserve" are unallowable. Other contingency costs may be allowable with certain restrictions; see [2 CFR 200.433](#) "[Contingency Provisions.](#)" The Grantee may request funds under any of the Object Class Categories as long as the item and amount are reasonable and necessary to perform the proposed work and allocable to the federal award in accordance with relative benefits received.

**IMPORTANT: Items identified as direct costs to the project may not be duplicative of costs included in the indirect pool that are the basis of any indirect rate applied for this project.**

#### SF-424A - Section A: Budget Summary

In PAGE, add each funding source that will be utilized during the proposed PY to the SF-424A. Funding Sources can be classified as Federal, Applicant, Local, Other, Program Income, State, SERC, CSPP, PVE, or Third-Party Contributions. New funding should be identified under "New/Revised Budget." Each funding source should be listed as a separate line item.

- Grantee should include, as a separate line item, any leveraged funds to be used in combination with DOE funds, and will follow all DOE rules, regulations, and guidelines. Most commonly, Grantees add non-DOE resources into the award budget to access additional administrative funds and complete additional homes following the DOE process and procedures.
- **Leveraged funds that run parallel or outside the DOE award (not included in the DOE budget) have greater flexibility.**

- Leveraged funds can come from several sources:
  - Weatherization funding appropriated by the state.
  - Low Income Home Energy Assistance Program (LIHEAP).
  - Leveraged resources from utilities, universal service funds, etc.
  - PVE Funds.
  - Program Income.
- All SERC and CSPP funds follow the budget rules outlined in these Application Instructions and are subject to all administrative limitations.

**Table 3:** There are advantages and challenges associated with including leveraged funds within WAP Grantee Plan in both the SF-424 Application and SF-424A Budget. Grantees should keep the following considerations in mind when determining whether to include leveraged funds in their WAP Plan.

**Table 3: Leveraged Funds**

	<b>Advantages</b>	<b>Challenges</b>
Leveraged Funds <b>Included</b> in Budget	By including leveraged funds amount in the budget, those funds are calculated into administration percentages and T&TA allocations, giving the Grantee and Subgrantees additional funds to administer the leveraged resources and train staff. (If the leveraged funds include an administrative component, there is likely no need for this approach.)	Must follow all DOE rules, regulations and guidelines, and any measures installed using these leveraged funds must be justified by the audit/priority list, follow DOE approved procedures, and must be included in the average cost calculation. As such, the Grantee cannot use the leveraged funds for any measures or activities not justified by the audit or included in Appendix A.
Leveraged Funds <b>Not Included</b> in Budget	Leveraged funds do not have to follow all DOE rules. Instead, these funds can be used in parallel to the DOE Program and funds can be allocated for other activities not necessarily justified by the audit or included in Appendix A (e.g., house repairs beyond the allowable incidental repairs, replacing stand-alone freezers, health and safety activities that if not accomplished might result in a deferral, etc.). A percentage of WAP grants can be used to attract leveraged funds even though the leveraged funds are not included in the DOE Program budget.	No additional DOE funds above the allowable administrative fund percentage can be used to administer leveraged funds or be allocated for T&TA if the leveraged funds are not included in the DOE budget. Any needed additional administrative funds must be accounted for out of the leveraged funding budget.



### III.2 Budget Categories – Section B

#### SF-424A - Section B: Budget Categories

The budget columns are organized by mandatory and optional categories.

#### **Mandatory Budget Categories:**

- Grantee Administration
- Subgrantee Administration (if applicable)
- Grantee T&TA
- Subgrantee T&TA (if applicable)
- Program Operations
- Weatherization Readiness Funds (if applicable).

#### **Optional Budget Categories:**

- Vehicles and Equipment
- Liability Insurance
- Leveraging
- Health & Safety
- Financial Audit
- Energy Crisis
- Special Projects I-V.

#### **Award Specific Budget Categories:**

- SERC Grantee Administration
- SERC Subgrantee Administration
- SERC Program Operations
- SERC Health & Safety
- CSPP Grantee Administration
- CSPP Subgrantee Administration
- CSPP Program Operations
- CSPP Health & Safety.

The “Total” of Section A must equal the “Total” of all columns in Section B.

**Object class** budget categories include Personnel, Fringe Benefits, Travel, Equipment, Supplies, Contract, Other Direct Costs, and Indirect Costs. Construction is not applicable to WAP.

For Object class budget categories that relate solely to Subgrantee expenditures, the total estimated cost should be reflected in the Contract category.

A detailed justification and explanation for Grantee administration must be included, in accordance

with [10 CFR 440.12\(b\)\(3\)](#). All amounts categorized as 'Other Direct Costs' must be supported with a detailed listing of items and costs.

The following supplemental instructions provide definitions and examples of the required budget categories. The column and page notations in parentheses following each budget category refer to Section B of Standard Form 424A.

Grantees are required to stay within the various budget category thresholds each year. A specific cost category may “over run” in a particular year; however, this should be the exception, not the rule. Grantees should not approach the budget with the expectation that they will catch up in the cost categories, particularly those with regulatory or programmatic limits, at the end of the project period.

### **Administrative Categories**

The Consolidated Appropriations Act of 2021 (Pub.L.116-260) amended [10 CFR 440.18\(e\)](#) to require that “Not more than 15 percent of any grant made to a State may be used by the Grantee and Subgrantees for administrative purposes in carrying out duties under this part, except that not more than 7.5 percent may be used by the State for such purposes, and not less than 7.5 percent must be made available to Subgrantees by States. A State may provide in its annual plan for recipients of grants of less than \$350,000 to use up to an additional 5 percent of such grants for administration if the State has determined that such recipient requires such additional amount to implement effectively the administrative requirements established by DOE pursuant to this part.”

Grantees must only use new PY total allocation funds in determining the administrative allowances, as any carryover funds have already had administrative costs allocated. Unexpended funds in the Administrative category accounts may be carried over from the previous budget period within the award, provided there is sufficient support and justification for their continued use. Grantees can also choose to include any administrative carryover funding into the Program Operations category and/or provide a portion of their Grantee administrative funds to Subgrantees.

Allowable Administrative budget calculation proceeds as follows:

1. Multiply the **new PY total allocation x 7.5% (or less)** to determine Grantee Administrative budget total.
2. Multiply the **new PY total allocation x 7.5%** to determine Subgrantee Administrative budget total.
3. *(Optional by the Grantee)* Add up to an additional 5% for Subgrantees with **total new PY allocations less than \$350,000** to get the new PY Administrative amounts.
4. Then, Grantees can carry over (add) previously budgeted but unused Administrative amounts, “provided there is sufficient support and justification for their continued use.”
  - WAP legislation and regulations do not define the Administrative cost categories. Any expenditure, allowed by the Office of Management and Budget (OMB) cost principles, or by a Grantee or Subgrantee may be charged as Administrative cost. However, certain costs in this Program that are excluded from other categories can only be administrative.

- Grantee Administration and Subgrantee Administration are considered unique to each organization. The organization must define its Administrative costs consistent with the generally accepted accounting practices and procedures within the organization.
- Indirect costs can be included in Grantee Administration and will be considered an allowable cost provided there is a federally approved indirect rate(s) or cost allocation plan. The indirect cost rate used may be approved by a federal department or agency other than DOE. See [2 CFR 200.414 Indirect \(F&A\) costs](#) for more information. The rate/amount allowable does not invalidate the Program budget category limits.

DOE has identified instances where certain administrative functions should be charged to Program Operations because of the nature of the expense (e.g., client intake, recordkeeping, salary/fringe for Program Managers and coordinators, telephone costs, etc.). DOE encourages Grantees to allow their Subgrantees to use this flexibility where it is appropriate. Grantees must establish uniform guidance to identify which funds may or may not be charged as Administrative costs and/or Program Operations costs.

### Grantee Administration

- The total charged to Administration can be **no more than 7.5% of total new PY funds awarded**. Cost allocation between this category and Grantee T&TA must be in accordance with [2 CFR 200](#) and [10 CFR 440.23 “Oversight, training, and technical assistance.”](#)

### Subgrantee Administration

- Subgrantee Administration must be at least 7.5% of the total new funds awarded.
- Grantees may allow Subgrantees **who receive less than \$350,000 of new DOE appropriated funds**, to use **up to an additional 5%** of their subawards for administration. This additional funding can be approved only to implement the administrative requirements of the Program.
  - Grantees shall develop criteria to be used to determine when eligible Subgrantees may use **up to an additional 5%** of their subawards for administrative purposes.

The total effect of the additional 5% of administration costs may result in the Grantee exceeding the 15% Administrative cost category for the award.

Unlike states, direct service providers such as Tribes and territories are eligible for both the Grantee and Subgrantee portion of Administrative funds.

### Grantee T&TA and Subgrantee T&TA

- The maximum amount available for Grantee and Subgrantee T&TA is included with the annual WPN 24-2 “Program Year (PY) 2024 Grantee Allocations.
- Allowable expenditures include:
  - Costs incurred for T&TA for any Grantee or Subgrantee (including monitoring and Quality Control Inspector [QCI] training).
  - Providing information concerning conservation practices to occupants of eligible

- dwelling units (client education).
  - Evaluation of Program outcomes.
  - Participation, travel, logistics of training, and technical assistance activities and events.
- Grantee purchases of vehicles or equipment, which are **directly related** to specific T&TA activities, such as monitoring, etc.
  - T&TA funds shall **not** be used to purchase vehicles or equipment for Subgrantees to perform weatherization services. The cost of these Subgrantee vehicles or equipment to support the Program must be charged to the Vehicle/Equipment or Program Operations categories.

### Program Operations

Per [10 CFR 440.18](#), costs incurred for Program Operations are generally defined as the direct costs necessary to implement weatherization of an eligible dwelling unit but not included in the material costs. While some of these categories could be charged as allowable Administrative or T&TA costs – depending on the nature of the expense – they are almost always part of the average cost per dwelling unit (ACPU) calculation. Where there are costs that could be charged to other Budget Categories, it is the determination of the Grantee which category should be used. DOE expects that the Grantee will require consistency among its Subgrantees when identifying a cost category other than Program Operations for these specific charges. Many of these costs cannot be directly related to a specific dwelling unit—for example, vehicle and equipment maintenance or purchases of tools and equipment. These costs are amortized over the number of dwelling units completed during the contract period. For example, the cost of a blower door (\$4,500) could be amortized over the 150 homes completed during a contract period, resulting in a \$30 increase in the ACPU for the homes completed in that time frame.

Program Operations costs may include but are not limited to the following:

- Materials listed in Appendix A or DOE-approved energy audit protocol\*.
- Materials purchased for incidental repairs as defined in [10 CFR 440.3\\*](#).
- Materials purchased for health and safety improvements\*.
- Transportation of weatherization materials, tools, equipment, and work crews to a storage site and to the site of weatherization work\*\*.
- Maintenance, operation, and insurance of vehicles used to transport weatherization materials\*\*.
- Maintenance of tools and equipment\*\*.
- Purchase or annual lease of tools, equipment, and vehicles\*\*.
- The required fees related to building permits from local governments are allowable under this category\*\*\*.
- Employment of personnel directly related to the operation of the Program\*\*\*.
  - This category is defined for general consistency purposes such as weatherization coordinators' salary and fringe benefits expenditures for actual supervision of labor, client intake, recordkeeping, etc.
  - Storage of weatherization materials, tools, equipment, and weatherization vehicles.
  - Space rental. As with vehicles and equipment, neither Grantees nor Subgrantees may pre-pay leases that exceed the end of the grant period.

- Utility costs at storage facility only (e.g., heat, lights, and water).
- Retrofitting storage facility.

**\*NOTE:** While health and safety costs are allowable under the Program Operations category, DOE recommends Grantees include a separate Health and Safety category in the budget.

**\*\*NOTE:** All vehicle purchases must receive prior DOE approval; any equipment \$5,000 or more must also receive prior DOE approval. Neither Grantees nor Subgrantees may prepay leases that exceed the end of the grant period.

**\*\*\*NOTE:** Weatherization is a non-construction program; therefore, no construction of buildings or acquisition of real estate can be charged to this grant. Improvements to a property that are **not in direct relation** to carrying out weatherization-specific tasks **are not allowable** under this grant (e.g., paving a parking lot of the storage area is not considered allowable; however, retrofitting a storage facility with appropriate shelving to accommodate supplies is allowable). Grantees should consult with their respective PO and/or DOE Grants Management Specialist (GMS) to clarify any areas of Grantee question or concern.

- Labor category expenditures are limited to those defined in [10 CFR 440.19](#).
  - Payments to employ labor or engage contractors including:
    - Payments to subcontractors
    - Salaries and fringe benefits of crew members
    - Salaries and fringe benefits of crew leaders.
  - This category also includes auditors/assessors, QCIs, field supervisors who are not installing materials, and warehouse personnel, such as inventory clerks, who are engaged in handling materials.
  - Because T&TA funds are limited, Grantees and Subgrantees may charge the cost of training to the T&TA category and the employee's time for participation in the event under the labor category. Costs associated with training contractors that work within the Weatherization Program may also be charged to T&TA.

### **Health and Safety – Optional Category (Recommended)**

- Indicate the amount of federal funds to be used to mitigate energy-related health and safety hazards, which are necessary to the installation of weatherization materials in accordance with [10 CFR 440.16\(h\)](#) and [440.18\(d\)\(15\)](#). The H&S cost category should include materials and labor, but not training related to the implementation of health and safety measures. Refer to [WPN 22-7](#) for allowable costs associated with health and safety.
- Grantees must set H&S expenditure limits for their Subgrantees, providing justification by explaining the basis for setting these limits and providing related historical experience (frequency and cost). It is possible these limits may vary depending upon conditions found in different geographical areas. Limits must be expressed as a percentage of the ACPU. For example, if the ACPU is \$5,000, 10% would equal an average of \$500 per dwelling unit for health and safety. These funds are to be expended by Subgrantees in direct weatherization

activities that mitigate health and safety concerns.

- H&S budget requests beyond 15% must be reviewed by the DOE PO. H&S budgets are a percentage of Program Operations (based on H&S cost category divided by the Program Operations cost category). Additional information may be requested to justify the higher percentage.
- The regulations do not mandate a separate H&S budget cost category, but if the Grantee chooses to do so, expenditures are excluded from the ACPU calculation. This separate category also allows these costs to be isolated from ACPU calculations and cost-justification requirements within the energy audit. If Grantees choose not to have a separate H&S budget category, health and safety costs must be included in the calculation of the ACPU and cost-justified through the energy audit. DOE recommends that Grantees establish a separate health and safety budget cost category.

#### **Vehicles and Equipment** with an acquisition cost of \$5,000 or more – *Optional Category*

- In 2001, DOE created the optional Vehicles and Equipment budget category [WPN 17-6](#), providing Grantees a mechanism to allow Subgrantee amortization of vehicle and equipment costs over multiple years. This can be particularly useful to small Subgrantees that do not have alternative funding sources and are unable to balance their production and ACPU requirements when absorbing the vehicle or equipment costs over a single year. *Alternatively, vehicles and equipment may be expensed as a component of the Program Operations budget category.*
- If the Vehicle and Equipment category is proposed in the budget, the Grantee must manage and report when costs were expensed as well as how costs are amortized in the Quarterly Performance Reports (QPR).
- If vehicles and equipment will not be purchased by the end of the PY, DOE encourages Grantees to have provisions in the Subgrantee awards to allow the use of the funding to complete additional homes and minimize unexpended balances.

#### **Liability Insurance** – *Optional Category (Recommended)*

- All Grantees and Subgrantees must be covered by liability insurance. Liability insurance refers to the general contractor, or other policies that provide protection in case of personal injury or property damage resulting from the weatherization services. Liability insurance can be charged to the liability category in the budget, which was created to ensure that such costs would not have to be charged to the Administrative cost category (see [preamble to the Federal Register Notice, 45 Fed. Reg. 13028, 13031, Feb. 27, 1980](#)). DOE recommends Grantees use this option.
- If the Grantee provides no allowance for the cost as a separate Budget Category in the Grantee State Plan, the cost of liability insurance is part of the ACPU. If the Grantee has a set-aside for Liability Insurance in their Grantee Plan, the Subgrantees can purchase policies and not include the expense as part of their ACPU. This provision was established to cover general agency liability insurance and does not include any vehicle-related insurance.
- Liability insurance policies generally do not provide for many health and safety measures, especially lead in the form of lead-based paint and other hazardous conditions that might be caused or exacerbated by weatherization activities. Grantees and/or Subgrantees may purchase

Pollution Occurrence Insurance (POI) as a part of, or an addendum to, general liability insurance and the costs may be included in the liability insurance category. The policy cannot exclude lead if DOE funds are used to purchase the policy. If Grantees or Subgrantees do not obtain POI coverage and damage occurs or there is disturbance to any other environmental pollutants, the cost of remediation, clean up, relocation, medical expenses, or any other resulting costs may not be charged to DOE Weatherization and must be covered by another funding source.

### **Leveraging – *Optional Category***

- WAP regulations ([10 CFR 440.14\(c\)\(6\)\(xiv\)](#)) permit Grantees to take a percentage of their grant to undertake leveraging activities which may provide additional funding or other resources to supplement Weatherization or be used to run a parallel program (regardless of who initiates the action). Leveraging activities include paying for agency staff or hiring consultant staff to explore and develop partnerships with utility companies and other entities that will generate non-federal resources for weatherization.
- Leveraging funds can be used by both the Grantee and Subgrantee to:
  - Pay for agency staff or hiring consultant staff to explore and develop partnerships with utility companies and other entities that will generate non-federal resources for weatherization.
  - Provide oversight and administration of activities.
  - Hold meetings.
  - Facilitate matching funds.
  - Negotiate contracts, MOUs, etc.
  - Develop program design.
  - Provide technical assistance.
- The leveraging column can consist of one or more leveraging activities.
  - Up to 15% of the annual federal formula allocation (including PVE funds used under WAP) can be used for attracting leverage resources. DOE considers this percentage reasonable for leveraging activities that are in accordance with [10 CFR 440.14\(c\)\(6\)\(xiv\)](#). The DOE PO can approve this percentage and related purpose with appropriate explanation of activities to be conducted.
  - Should a Grantee request to have more than 15% of their grant used for leveraging purposes, DOE will conduct a secondary level of review and will request additional information on the anticipated return on investment to justify the higher percentage.
- If the Grantee chooses to add leveraged funds to the budget, required information will need to be submitted in the Annual File under IV.4 DOE-Funded Leveraging Activities.

### **Financial Audit – *Optional Category (Recommended)***

Program financial audits (per [2 CFR 200.425](#) only for Subgrantees expending \$750,000 or more during the Subgrantee's fiscal year) are required annually by [10 CFR 440.23\(d\)](#) and are allowable as either an Administrative expense or as a separate Budget Category in the Grantee Plan. In the past, the cost of these audits was charged to the already overburdened Administrative cost category and sometimes resulted in less than adequate financial audits. Grantees are encouraged to provide relief through the

creation of a Financial Audit Budget Category, thus allowing these charges to be covered when Subgrantees meet the threshold contained in [2 CFR 200 Subpart F – Audit Requirements](#). If weatherization is one of several programs within an agency being audited, only the fair-share proportion of the overall financial audit costs should be charged to the DOE award.

Grantees must include the following affirmative statement or similar verbiage in their Financial Audit budget justification section or in section IV.7 Miscellaneous of the Annual File: “In accordance with 2 CFR 200.425(a)(2), only those Subgrantees expending more than \$750k in total Federal Funding annually will receive FINANCIAL AUDITS funding identified in the Grantee's SF-424a Budget.”

*NOTE: [2 CFR 200 Subpart F-Audit Requirements](#) (State and local governments and nonprofits) and [2 CFR 910 Subpart F](#) (for-profit entities), should be consulted for thresholds, etc. and additional questions should be directed to the DOE Contracting Officer (CO).*

### Other Optional Categories

- Special Project(s) (*Column in PAGE but Grantees can designate a specific purpose.*)
  - Energy Crisis
  - Disaster Relief
  - Energy Audits.
- Low Cost/No Cost: The cost of low-cost/no-cost materials is not to be included in the ACPU (labor to install the low-cost/no-cost materials is not an allowable cost). Details of any proposed low-cost/no-cost program component must be outlined in the plan following guidelines in [10 CFR 440.20](#).

### III.3 Budget Justification

DOE POs commonly focus on the information in the Budget Categories (columns) of Section B of the Budget SF-424A in relation to the scope of work proposed in the Annual and Master File. The Financial Assistance Office (FAO) staff at DOE responsible for reviewing and approving the budget commonly focus on whether the Grantee has included sufficient detail and support for the information for the Object Class categories (rows) in Section B of the budget. Clicking on the Section B row labels in PAGE (Personnel, Fringe Benefits, Travel, etc.) accesses the budget justification detail.

An updated budget justification is required with each new budget proposed. Please note that the total amount of funding for each Object Class category (e.g., Personnel) in the budget justification screens needs to equal the total for that corresponding object class category in Section B of the SF-424A budget and the budget categories **shall have whole dollar values in each cell**. To address feedback received from Grantees, DOE enhanced the PAGE system to provide an “Auto Calculate” option that will adjust the multipliers for each entry to achieve whole dollar values for Personnel, Fringe, and Indirect Costs categories.

When a Grantee proposes using non-DOE resources not included in the budget to meet a WAP requirement (e.g., personnel costs for a required function, travel to a national DOE meeting), then the Grantee must include a note acknowledging commitment to the DOE requirement within the



corresponding Object Class Category of the Budget Justification. If comments cannot be entered in the Budget Justification, then enter the information in Section B “Comments” of the SF-424A Budget. Grantees must provide their best and current estimate of each budget category at the time of submittal.

### **Personnel**

Grantees shall review and adjust staffing, description of responsibilities, salaries, hours, or percentage proposed over the next budget period to assure sufficient and appropriate stewardship of the DOE funds. The listed costs are solely for employees of the Grantee.

Grantees must identify positions to be supported and any key personnel, identified by title. All other personnel must be identified either by title or a group category. State the amount of time (e.g., hours or percentage of time) to be expended, the composite base pay rate, total direct personnel compensation and identify the rate basis (e.g., actual salary, labor distribution report, technical estimate, state civil service rates, etc.). Identify each staff position (or a Full Time Equivalent) that will be funded by DOE. Include the percentage of the salary that will be covered by DOE and specify the source of funding for staff time that is not covered by DOE. Identify the number of employees (or a Full Time Equivalent) that will be employed in each position or group category. Explain when staff time does not add up to 100% and indicate when other funding will pay for time spent on DOE work.

### **Fringe Benefits**

A federally approved fringe benefit rate agreement, or a proposed rate supported and agreed upon by DOE for estimating purposes, is required if reimbursement for fringe benefits is requested. If a fringe benefit rate has been negotiated with, or approved by, a federal government agency, a copy of the latest rate agreement must be included with this application. If there is not a current, federally approved rate agreement negotiated and available, provide a copy of the rate proposal and an explanation why there is not an existing federally approved rate agreement with the application. If DOE determines it will be the Grantee’s cognizant agency for a fringe rate agreement, the rate agreement will be finalized during award negotiations. Calculate the fringe rate and enter the total amount in Section B, line 6.b. (“Fringe Benefits”) of form SF-424A.

**IMPORTANT: If Grantees propose a fringe rate, they must provide a complete explanation and the full calculations used to derive the total fringe costs. If the total fringe costs are a cumulative amount of more than one calculation or rate application, the explanation and calculations should identify all rates used, along with the base they were applied to (and how the base was derived), and a total for each (along with grand total). The rates and how they are applied should not be averaged to get one fringe rate.**

### **Travel**

DOE expects Grantees to budget adequate funds to allow staff to participate in national and regional conferences, as well as participation on related planning committees, task forces, and other scheduled and related meetings. These events are considered high priorities, but DOE is aware that many Grantees have travel restrictions due to budgetary constraints or government policies that may prevent attendance

at these events. Funds for Grantee and Subgrantee travel are provided as part of the Weatherization grant award and proper usage of these funds will be closely monitored by DOE to ensure compliance within the travel budgets included in the Grantees' Annual Plans. Additional travel may also be budgeted for in-state meetings, administrative, financial, and technical monitoring of Subgrantees, etc. Grantee Annual Plans must detail the number of travelers, estimated cost per traveler, duration of trip, and total cost per trip.

Proposed travel needs to clearly identify proposed activities and reflect sufficient resources. DOE recognizes that many events and activities may require more than one person from each Grantee and Subgrantee to cover the amount of new information being disseminated (e.g., a conference may have multiple tracks) and/or have sufficient expertise (e.g., a single staff person may not have the skills to adequately monitor technical functions and the administrative/financial elements).

Grantees should cite appropriate law, regulation, or policy governing Grantee travel, and if an appropriate Grantee web link indicates per diems and process, indicate that in the narrative description. In the absence of an acceptable, written policy regarding travel costs, Grantees and Subgrantees must comply with [2 CFR 200.475\(d\)](#).

### **Equipment**

This category only covers equipment purchases at the Grantee level, not Subgrantee/contractor level. Vehicles and equipment mean tangible, nonexpendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. A Grantee may use its own definition of vehicles and equipment provided that such definition would at least include all equipment defined above. Further definitions can be found in [2 CFR 200.1](#).

In accordance with [WPN 17-6](#), proposed equipment should be identified, providing a basis of cost such as vendor quotes, catalog prices, prior invoices, etc., and briefly justifying its need. Also indicate whether the equipment is proposed to be used on other projects or is 100% dedicated to the DOE project.

### **Materials and Supplies**

Supplies are generally defined as an item with an acquisition cost of \$5,000 or less and in many, but not all situations, supplies have a useful life expectancy of less than one year. Supplies are generally consumed during the project performance. Further definitions can be found in [2 CFR 200.1](#).

Proposed supplies should be identified. The cost of the supplies should be supported by vendor quotes, catalog prices, prior invoices, etc. Justification for the supplies to meet the objectives of the grant should also be provided. Note that supply costs identified as direct costs in the budget may not be duplicative of supply costs included in the indirect rate applied for this project.

Grantees who propose the same copier and same server each year create a perception that these items are placeholders as opposed to what the Program truly needs and expects to acquire in the upcoming budget period. Therefore, if a Grantee has a rotating information technology (IT) replacement type

policy, provide supporting documentation as an attachment to the SF-424 Application and/or provide a web link to support the basis.

- *For Grantees with Subgrantees:* These are materials and supplies purchased for use by the Grantee at the Grantee level, and Grantees should make certain to update annually, based on Program needs.
- *For direct service provider Grantees (e.g., Tribal organizations, territories):* This category will be different based on how the provider procures materials. Grantees that are direct service providers should consult with their DOE PO to determine appropriate cost category.

### **Contract**

The Grantee must provide detailed descriptions and justify all costs related to Subgrantees, contractors, and consultants.

- **Subgrantees:** This is a single line item that refers to and is consistent with the Subgrantee Allocation table in Section IV.1 of the Annual File. If a Subgrantee has not been selected, the Subgrantee should be listed as To Be Determined (TBD). A TBD Subgrantee, when selected, will require prior approval from the DOE CO to be added to the award.
- **Vendors (including contractors and consultants):** The Grantee must identify each training center, training contractor, and other contracted Program delivery service provider, such as a database developer, along with the proposed budget amount.
  - Justification of vendor costs (in any amount) should include the purpose for the products or services and support for the estimated costs that is considered sufficient for DOE evaluation.
  - If a vendor has not been selected or procured, the vendor should be listed as TBD. Please indicate if it is a single-year contract/purchase order, a continuation, an option year of a multiple year procurement effort or otherwise.

### **Other Direct Costs**

Other direct costs include cost items required for the project which **do not** fit clearly into other categories and are **not** included in the indirect pool for which the indirect rate is being applied to this project. This category commonly covers rent, utilities, phones, postage, subscriptions, etc. that are weatherization-specific direct charges to the award and that would not be appropriately categorized in other object class categories above. Include a justification for the cost such as vendor quotes, prior purchases of similar or like items, published price list, etc.

Grantees must include two specific statements as a part of the justification for all Other Direct Cost items:

- All costs included in Other Direct Costs are properly excluded from indirect costs to ensure there are no duplicate charges.
- All the costs proposed are only being used in support of WAP.

### **Indirect Costs**

Indirect costs are costs incurred for a common purpose, benefiting more than one program, and not readily allocable among individual programs based on their proportionate shares of benefits derived. An indirect rate agreement approved by another federal entity, or rate proposal supported and agreed to by DOE for estimating purposes, is required if reimbursement of indirect benefits is requested. If there is a federally approved indirect rate agreement, a copy must be provided with this application. If there is no current federally approved indirect rate agreement or if the federally approved indirect rate agreement has been changed or updated, a rate proposal and an explanation why there is not a federally approved rate agreement must be included with the application. If DOE determines it will be the Grantee's cognizant agency for an indirect rate agreement, the rate agreement will be finalized during award negotiations. Calculate, in whole dollars, the indirect rate dollars using the approved rate and enter the total in Section B., line 6.j. (Indirect Charges) of form SF-424A.

**IMPORTANT: Provide a complete explanation and the full calculations used to derive the total indirect costs. If the total indirect costs are a cumulative amount of more than one calculation or rate application, the explanation and calculations should identify all rates used, along with the base they were applied to (and how the base was derived), and a total for each (along with grand total). The rates and how they are applied should not be averaged to get one indirect cost percentage.**

### **III.4 Carryover Explanation**

Other than the first year of a new award, the Grantee shall include an explanation of any estimated carryover amount by the budget categories (broken down by Grantee Administration, Grantee T&TA, Subgrantee Administration, Program Operations, H&S, etc.) in which the funds are currently budgeted. The carryover explanation must include any formula (including SERC and CSPP) funds and shall be provided in a separate spreadsheet or other document attached to the SF-424 Application in PAGE. See Table 2: Carryover Example for reference.

### **III.5 Reprogramming Training and Technical Assistance Funds**

Grantees may reprogram T&TA funds to Program Operations following the considerations below:

1. Based on the statewide average cost per home at which the Grantee is currently operating, the Grantee has enough workers trained to meet the planned production.
2. The Grantee has reviewed and made certain that the capacity to expand current production levels of homes weatherized can be attained.
3. There are sufficient funds to conduct monitoring visits if a Grantee uses T&TA funds to accomplish monitoring requirements.
4. The Grantee has considered using a portion of their T&TA funds for necessary Program Assessment support.

If after these considerations, a Grantee would like to reprogram funds that exceed more than 10% of their T&TA funds to Program Operations, they will need to make an amendment to their Grantee Plan. This amendment should address the issues outlined above and would require a new production

schedule. Additionally, Grantees should be aware that once T&TA funds are reprogrammed into the Program Operations budget category they cannot be reprogrammed back into T&TA funds at a later date without the approval of the DOE CO. For additional information on the process needed to request reprogramming funds, please contact your respective PO.

## IV. ANNUAL FILE

### IV.1 Subgrantees

Grantees must determine all Subgrantees that will carry out the Program and comply with [2 CFR 200.331](#) and [10 CFR 440.15](#). Up-to-date information must include: name, address, UEI number, contact person, type of organization (e.g., community action agency, nonprofit, Tribal organization, or unit of local government), tentative allocation (including Weatherization Readiness Funds (WRF), if applicable), CSPP allocation (if applicable), number of dwelling units (minimum one unit) expected to be weatherized during the PY, sources of labor, and congressional district(s) and counties served. Subgrantees who receive SERC will include all the information above and be listed in a separate section of the Annual File labeled SERC Subgrantees.

### Selection of Subgrantees

Subgrantees and any subcontracting agencies **must check the Excluded Parties Listing (EPLS) for their subawards in the [System for Awards Management \(SAM\)](#)**. The EPLS includes information regarding entities debarred, suspended, proposed for debarment, excluded, or disqualified under the non-procurement common rule, or otherwise declared ineligible from receiving federal contracts, certain subcontracts, and certain federal assistance and benefits. Please refer to the Administrative and Legal Requirements Document (ALRD), Registration/Submission Requirements, item 1 for additional information. No awards will be made by DOE to Grantees with applications that include organizations on the EPLS.

Procedures for annual selection, replacement, or termination of community action agencies (CAAs) or other public or nonprofit organization (known collectively as “Subgrantees”), are set forth in [10 CFR 440.14](#) and [10 CFR 440.15](#).

Grantees are reminded that [400.15\(a\)\(3\)](#) states that, “preference is given to any CAA or other public or nonprofit entity which has or is currently administering an effective weatherization program.”

Subgrantees that are CAAs, or other public or nonprofit entity are reminded that “preference” as stated in the regulations does not constitute a “guarantee” they will be selected in any future year by a Grantee.

When not selecting a current Subgrantee for a future award a Grantee must provide a detailed analysis as part of its public hearing on the Grantee Plan and provide all affected Subgrantees with an opportunity to be heard during the hearing. This analysis must specifically address [10 CFR 440.14\(b\)\(6\)\(i\) and \(ii\)](#) which states a proposed Grantee Plan must include “(i) [a]n analysis of the existence and effectiveness of any weatherization project being carried out by a Subgrantee; and (ii) [a]n explanation of the method used to select each area served by a weatherization project.” Also, to the extent a Grantee terminates financial assistance under a subgrant agreement for a grant period it must follow [10 CFR 440.15\(e\)](#) which requires Grantees to follow established Grantee procedures that provide notice of the Grantee’s reasons for termination and afford the Subgrantee an adequate opportunity to be heard and/or terms in the agreement between the Grantee and Subgrantee.

If the Grantee determines it will conduct a procurement process for one or more Subgrantee service territories during PY 2024, it should describe the plan in its PY 2024 Application. See Section V.8.

#### IV.2 WAP Production Schedule

This section must include the total number of dwelling units proposed to be weatherized under the program rule with grant funds during the budget period for which assistance is to be awarded and with the tentative allocation to the Grantee. A completed production schedule will satisfy this requirement. The form to be used for specifying the production schedule is included as part of the Annual File in PAGE.

Grantees need to determine an ACPU that correlates with their actual production reporting. The production schedule has space to calculate the ACPU for Program Operations, per [10 CFR 440.14\(c\)\(6\)\(vii\)](#).

#### IV.3 Energy Savings

Grantees shall provide an estimate of the amount of energy to be conserved, pursuant to [10 CFR 440.14\(c\)\(4\)](#). Grantees must indicate the methodology used to determine energy savings. No explanation is necessary when using the DOE Algorithm; therefore, nothing should be entered in the narrative box (leave the narrative box blank). The only time information should be in the narrative box is when the Grantee is explaining a method other than the DOE energy saving algorithm.

- DOE Algorithm
- Other (describe as outlined below).

Grantees that have not developed a methodology for computing energy savings can use the formula below.

<b>Table 4: DOE Algorithm</b>		
<b>DOE Program</b>	<b>Amount</b>	<b>Line</b>
Total DOE State Weatherization Allocation		(a)
Total Cost associated with Administration, T&TA, Financial Audits, or 15% of allocation		(b)
Subtract the amount entered in line (b) from line (a), for a total federal (DOE) funds available to weatherize homes		(c)
State ACPU or National WAP PY ACPU		(d)
Divide the amount entered in line (c) by the amount entered in line (d), for Total Estimated Homes to be Weatherized		(e)
Multiply (e) by 29.3 Mbtu* for Total Annual Estimated Energy Savings resulting from DOE appropriated funds		(f)

All Funding Sources		
Total funds (e.g., WAP, State, Leveraged, LIHEAP, and other non-federal sources of funds) used by the Grantee to weatherize homes		(g)
Total cost associated with the administration of Weatherization funds or 15% of total funds available to weatherize homes		(h)
Subtract the amount entered in line (h) from line (g), for total funds available to weatherize homes		(i)
State ACPU or National WAP PY ACPU		(j)
Divide the amount entered in line (i) by the amount entered in line (j), for Total Estimated Homes to be weatherized		(k)
Multiply (k) by 29.3 Mbtu* for Total Annual Estimated Energy Savings resulting from all funding sources		(l)

The most recently published evaluation of WAP, specifically the report, “[Weatherization Works: Summary of Findings from the Retrospective Evaluation of the U.S. Department of Energy’s Weatherization Assistance Program](#),” estimates annual savings of **29.3 million British thermal units** (Mbtu) per year for natural gas heated homes. The savings estimate includes site-built, single-family weatherized homes nationwide. This value is representative of the total energy savings expected from weatherization for an average house: from the fuel used for space heating fuel (e.g., natural gas, propane, fuel oil, and electricity), which may include water heating, and the source value of the electricity savings for the house (e.g., space heating, space cooling, water heating, lighting, refrigerators).

#### **Using Other Weatherization Savings Methodologies:**

The estimate and the methodology used to project energy savings shall be clearly explained including the information sources for energy savings per unit. Applicants shall also quantify how much energy was saved in the preceding PY and compare it to the estimate given last year.

DOE continues to encourage Grantees to proceed with statewide Grantee evaluations. Grantees undertaking such an evaluation are requested to coordinate their plans with DOE so the information may be shared to gain maximum results. Technical assistance is available to Grantees through DOE to help with the design and analysis plans for Grantee evaluation studies. DOE published the report, “[Estimating the National Effects of the U.S. Department of Energy’s Weatherization Assistance Program with State-Level Data: A Meta-Evaluation Using Studies from 1993 to 2005](#).” The individual evaluations conducted by the Grantees were critical to this effort. DOE also completed a [non-energy benefits study](#) in 2021.

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

The [State Energy Efficiency Program Improvement Act of 1990 \(SEEPIA\)](#) encouraged weatherization to consider an optional activity that may be undertaken within the award. DOE released [Weatherization Program Notice 22-9: Managing Multiple Funding Streams within the Weatherization Assistance Program](#) on how to manage multiple funding streams within the Program includes a section on



leveraged funding. Additional information contained in [WPN 22-12, Weatherization Assistance Program Multifamily Weatherization](#), effective date September 14, 2022, also addresses how leveraged funds and buydown funds are treated in operating a local program.

**Leveraging Partnership Development and Management:** [10 CFR 440.14\(c\)\(6\)\(xiv\)](#) requires that Grantees provide the amount of federal funds to be budgeted and an explanation of how they will be used to leverage increased amounts of weatherization assistance to low-income clients. Leveraging means the obtaining by a state or Subgrantee of additional program-targeted non-federal cash or in-kind contributions as a result of the Weatherization Program-funded activities. Up to 15% of the annual WAP formula may be proposed for leveraging and the application will still be eligible for the typical DOE review. Applicants requesting a percentage *higher* than 15% will undergo secondary review. Grantees may be required to provide more justification and documentation to satisfy the more in-depth review process. When the proposed management costs for leveraging activities are anything beyond the capacity of the Grantee Administration category, then a new budget category (column) for Leveraging can be created in the budget and those costs will need to be tracked separately.

Grantees shall provide an explanation of how these funds will be used to obtain non-federal resources, how funds leveraged will be used to support WAP, the leveraging effect of those funds, and the rationale for funds being used.

When using DOE funds, those funds must be used to obtain non-federal resources to increase the number of low-income homes weatherized, and/or increase the scope or type of services provided to low-income homes. Grantees are encouraged to generate at least one non-federal leveraging dollar for every DOE dollar expended. Grantees will report on leveraging activities in the annual reports to DOE for training, technical assistance, monitoring, and leveraging activities.

DOE realizes generating new leveraging resources is not always immediately successful. The Grantee, as well as the DOE PO, should review past performance and determine after some reasonable period if the lost opportunity of weatherizing additional homes with the DOE funds outweighs the continued budgeting and spending towards unsuccessful leveraging efforts.

Reporting may be difficult where multiple sources of funds are leveraged to weatherize a unit, or a complicated leveraging agreement has been reached with non-federal partners. To assist Grantees and Subgrantees in determining what a DOE weatherized unit is, DOE offers the following definition.

**DOE Weatherized Unit:** *A dwelling on which a DOE-approved energy audit or priority list has been applied, at least one DOE-funded allowable energy conservation measure is installed, and weatherization work has been completed. As funds allow, the measures installed on this unit and paid for with DOE funds have a Savings-to-Investment Ratio (SIR) of 1.0 or greater, but also may include any necessary energy-related health and safety measures, in accordance with [10 CFR 440.21\(d\)](#): “The cost of incidental repairs must be included in the cost of the package of measures installed in a dwelling and receives a final inspection.”*

The use of DOE funds on a unit may include, but is not limited to, indirect expenditures (e.g., Administrative, T&TA, amortized equipment) and direct costs such as energy auditing, measure installation, H&S, and inspections. A dwelling unit that meets both the definition of a DOE weatherized unit and uses **DOE funds for direct costs must be reported as a DOE-completed unit.**

**Leveraging Funds Implementation:** In some limited cases, a Grantee may want to consider including the actual leveraging funds as part of the DOE grant to access additional Grantee administration resources. Although allowable, most Grantees carefully weigh the additional responsibilities, reporting, constraints, and DOE oversight and prefer to operate the leveraged funds as an activity outside the DOE grant budget.

If the Grantee chooses to add leveraged funds to the budget, the following information must be identified for each participating third party or Subgrantee: (1) the name of the organization; (2) the proposed dollar amount to be provided; (3) the amount as a percentage of the total project cost; and (4) the proposed leverage item (cash, services, or property).

#### **IV.5 Policy Advisory Council (PAC) Members**

A PAC shall be established in accordance with [10 CFR 440.17](#). The regulations reflect DOE’s intentions to offer Grantees some flexibility in establishing the PAC. In order to change the PAC to an existing Grantee council or commission, not affiliated with WAP, the Grantee must explain to DOE why the current WAP PAC is either nonexistent or is not functioning as outlined in [10 CFR 440.17](#) of the Program regulations. DOE does not intend, nor does it mean to imply, that the Grantee has the discretionary authority to eliminate and replace the PAC without due process or cause.

Any Grantee who desires to substitute an existing Grantee council or commission for a PAC, must address this issue as a part of the public hearing held regarding the annual Grantee Plan. The DOE PO will make the final determination regarding this request as a part of the review of the application and Grantee Plan.

Also, any person(s) employed in any Grantee Weatherization Program can be a member of an existing commission or council but must abstain in reviewing and approving the activities associated with WAP. This requirement to abstain only pertains to Grantee-level PAC members, not Subgrantee-level PAC members.

Provide the following details in the form in PAGE (or in a PDF attachment) when completing the PAC section:

- Name of each person on the PAC.
- Complete up-to-date contact information for each PAC member.
- Name and the type of organization they represent (interests such as low-income, elderly, persons with disabilities, Native Americans, utilities, etc.).
- Minutes from required PAC meetings related to the development of and comment on the Grantee Plan.

#### **IV.6 State Plan Hearings**

DOE reminds Grantees that pursuant to [10 CFR 440.14\(a\)](#) before submitting an application to DOE, a Grantee must provide **a minimum of 10 calendar days' notice** of a hearing to inform prospective Subgrantees of how they may obtain a copy of the proposed Grantee Plan and must conduct one or more public hearings to receive comments (verbal or written) on the proposed Plan. Grantees can proceed with virtual public hearings, as long as the provisions regarding public notice and ability for the public to comment are adhered to (i.e., webinar, livestream, etc.).

Grantees may use Grantee-approved print publications and/or alternative electronic public notification processes that are used by other federally funded Grantee programs, provided they are also approved by the DOE PO in advance.

As part of the Hearings and Transcripts submission, the Grantee must identify how the notice was provided to the prospective Subgrantees and public (e.g., a list of publications, publisher's affidavit when available, and/or copy of the notice(s) must be attached to the SF-424 Application in PAGE), including proof of evidence of a minimum of 10 days' notice and availability to the draft Grantee Plan. DOE POs will review the notice to ensure Grantee compliance in notifying the public of where/how to obtain copies of the Plan. Most Grantees, states, and territories have laws governing the conduct of public hearings. If applicable, those laws and requirements must be followed as well.

DOE encourages the notice to include a summary or highlights of the proposed changes from the previous year's Plan. The summary should also include any changes being proposed in geographical services (e.g., how the Grantee may serve the entire state but on a rotating basis), consolidation or rebidding of network providers, credentialing, or training requirements, etc. Providing this information in advance will improve communication between the Grantee and Subgrantees and other interested parties and minimize disputes that may arise at the hearing. Whenever possible, DOE would like to be informed in advance of significant proposed program changes or issues of a contentious nature that will be addressed at the

hearing. DOE continues to encourage states to have a continual dialogue with Subgrantees either through regular meetings or PAC meetings that are open to Subgrantees. This will permit Grantees to better develop program improvements that will enhance program delivery and outcomes.

**Grantees must provide an official transcript of the public hearing.** Additionally, DOE considers the submission of a recording of the public hearing as a best practice, particularly if the hearing is anticipated to propose significant program changes or be contentious. Grantees are not required to use a court reporter. A transcript can be made from the recording of the hearing. If this approach is used, please submit the recording as well as the transcript.

Grantees shall attach an official transcript from the hearing and the link to the recording to the SF-424 Application in PAGE. DOE POs will review the minutes of the public hearing(s) on the annual Grantee Plan to determine that all issues are properly addressed by the Grantee prior to approval of the final Grantee plan. If an official transcript is under development, the Grantee should attach notes to the SF-424 application in PAGE to inform DOE of any issues raised and how the Grantee will address these issues. The official transcript should then be forwarded to the DOE PO upon completion.

Grantees should be aware that if significant program changes are made after the initial public hearing(s), an additional hearing may be required. **DOE encourages the inclusion of a reallocation provision in the Plan to enable the Grantee to actively manage the grant and move funds as necessary to fully expend funds during the budget period.** Vetting this reallocation provision during the initial public hearing may negate the necessity of performing subsequent hearings as long as the prescribed process, for the reallocation of funding in the DOE approved plan, is followed.

#### **IV.7 Miscellaneous**

This section is available for Grantees to use, as appropriate, for any activities that are not routinely administered as part of WAP or in the case there is no other section of the annual file specifically noted to describe the activities.

For the PY 2024 Application, the following elements must be included within the Miscellaneous Section:

#### **Recipient Business Officer and Recipient Principal Investigator**

Please identify the name, email address, and phone number for the “Recipient Business Officer” and “Recipient Principal Investigator,” as defined below.

These personnel are the official Recipient points of contact that will be identified in the Assistance Agreement, which is the authorizing award document issued by the DOE CO. If the designated Recipient Business Officer or Recipient Principal Investigator changes during the project period of performance, it is incumbent upon the Grantee to notify the DOE GMS and DOE PO assigned to your award.

**“Recipient Business Officer”** is the representative authorized to act on behalf of the Grantee to negotiate the award. All DOE official correspondence related to the award will be addressed to the Recipient Business Officer.

**“Recipient Principal Investigator”** is the technical representative authorized to act on behalf of the Grantee as project manager for the award. The Recipient Principal Investigator is the prime point of contact for the DOE PO during the project period of performance and will receive a copy of all DOE official correspondence related to the award.

## V. MASTER FILE

### V.1 Eligibility

Every dwelling weatherized must meet both the client eligibility *and* building eligibility requirements.

#### V.1.1 Approach to Determining Client Eligibility (V.1.1 Box 1)

The definition of "low income" that the state has chosen for use statewide to determine eligibility under [10 CFR 440.22\(a\)](#) must be stated per [10 CFR 440.14](#). Applicants should briefly describe their procedures, in accordance with [10 CFR 440.16\(a\)](#), to ensure that no dwelling unit is weatherized without documentation that the unit is an eligible dwelling unit (providing a copy of the link to a Policy and Procedures Manual may satisfy this requirement).

#### Income Verification (V.1.1 Box 2)

In determining what eligibility level will be used in its program, the Grantee must verify eligibility for weatherization assistance under this part. Per [10 CFR 440.22 Eligible dwelling units](#), the dwelling unit is eligible for assistance if it is occupied by a family unit:

- Whose income is at or below 200% of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget (OMB), except that the Secretary may establish a higher level if the Secretary, after consulting with the Secretary of Agriculture and the Secretary of Health and Human Services, determines that such a higher level is necessary to carry out the purposes of this part and is consistent with the eligibility criteria established for the weatherization program under Section 222(a)(12) of the Economic Opportunity Act of 1964; Pub. L. No. 88-452, 42 U.S.C. § 2701 *et seq*;
  - DOE distributes *Poverty Income Guidelines and Definition of Income* to Grantees. This document includes a revised definition of income for use by Grantees and Subgrantees in their programs. The revisions in this document include defining income, cash receipts, exclusions, proving eligibility, child support, annualizing income, and re-certification.
  - Grantees and Subgrantees are reminded that applicants applying for weatherization must have their eligibility documentation updated at least annually.
- Which contains a member who has received cash assistance payments during the preceding twelve month-period under Titles IV and XVI of the Social Security Act, Pub. L. No. 88-452, 42 U.S.C. § 2701 *et seq.* or applicable State or local law; or
- If a Grantee elects, is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that the income eligibility level 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. If the Grantee uses LIHEAP intake and the income eligibility is less than 200% of poverty, then the Grantee must have some other mechanism in place to accept and process WAP applications for those that either 1) do not qualify for LIHEAP, but are still at or below 200% of poverty, or 2) for those that choose not to apply for LIHEAP, but still want WAP services.

- [WPN 22-5](#) extended categorical income eligibility to U.S Department of Housing and Urban Development (HUD) means-tested programs. WAP Grantees and Subgrantees may certify that applicants have met the income requirements of HUD means-tested programs through mechanisms including, but not limited to, applicant documentation, interagency lists of recipients, shared system databases, etc. Method of verification of eligibility must be included in the client file.

Income limits chosen may not be arbitrarily lowered by the Grantee for parts of the Grantee service territory. The specific criteria above must be used; follow them carefully when stating the criteria in the Master File. The Master File must clearly state that application eligibility expires 12 months from certification date if work on dwelling unit (energy audit) has not been initiated.

### **Qualified Aliens Eligibility for Benefits (V.1.1 Box 3)**

Grantee must submit any policies or procedures in place to ensure DOE weatherization services shall only be provided to eligible populations.

Grantees are directed to review the [LIHEAP IM HHS Guidance on the Use of Social Security Numbers \(SSNs\) and Citizenship Status Verification](#).

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

#### **Procedures to determine that units weatherized have eligibility documentation (V.1.2 Box 1)**

Grantee should describe what dwelling structures are eligible for weatherization and the procedures for how each dwelling (and corresponding units) is determined to be eligible based on:

- Owner documentation.
- Income documentation for renters.
- Multifamily eligibility and rental units' descriptions should be covered under the Rental section.

#### **Describe Reweathering Compliance (V.1.2 Box 2)**

The [Consolidated Appropriations Act of 2021](#) amended to read as follows: “(2) 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.” This provision gives Grantees the flexibility to revisit those homes weatherized 15 years prior that may not have received the full complement of Weatherization services, including the use of an advanced energy audit or addressing health and safety concerns. This section must include the specific process for tracking homes previously weatherized 15 years prior to ensure that these units are not reweatherized with DOE funds.

Please see V.9 Energy Crisis and Disaster Response Plan section to follow appropriate procedures if the Grantee wishes to serve homes located in disaster areas.

*NOTE: The term “reweatherization” applies only to those units which fall into the time frame indicated above and described under [10 CFR 440.18](#).*

### **Describe What Structures are Eligible for Weatherization (V.1.2 Box 3)**

Grantees should exercise caution in dealing with nontraditional dwelling units such as shelters, apartments over businesses, etc. to ensure they meet WAP regulations on whether the unit is, in fact, eligible. Weatherizing these types of units should be discussed with, and if necessary, approved by, the DOE PO prior to weatherization.

The weatherization of nonstationary campers and trailers that do not have a mailing address associated with the eligible applicants is not allowed. The use of a post office box for nonstationary campers or trailers does not meet this requirement.

All Grantees must follow the restrictions for the listed allowable activities and historic preservation in their National Environmental Policy Act (NEPA) determination. Grantees with a Historic Preservation Programmatic Agreement (PA) must adhere to the restrictions of their DOE executed PA. Grantees without a PA are restricted to activities on structures less than 45 years old and not on Tribal land, unless those activities are reviewed by DOE. Grantees should review their NEPA determination and Historic Preservation PA, as applicable, to ensure they are compliant with all restrictions.

### **Describe How Rental Units/Multifamily Buildings Will Be Addressed (V.1.2 Box 4)**

DOE issued [WPN 22-12 Multifamily Weatherization](#) and [WPN 22-13 Weatherization of Rental Units](#) on September 14, 2022. Please reference this guidance.

Grantees shall include an explanation for how they will ensure that the benefits of weatherization to occupants of rental units are protected in accordance with [10 CFR 440.22\(b\)\(3\)](#) in this section. Grantees should satisfy this requirement by developing and submitting rental plans or procedures that address protection of renters' rights as specified in [10 CFR 440.22\(b\)\(3\)](#) and [10 CFR 440.22\(c\)-\(e\)](#).

Whether single-family or multifamily, the Grantee’s procedures for rental unit shall ensure that:

- Written permission of the building owner or authorized agent is obtained before commencing work.
- Benefits of the services accrue primarily to the low-income tenants residing in such units.
- For a reasonable period after completion, the household will not be subjected to rent increases (unless those increases are demonstrably related to other matters other than the weatherization work performed).
  - There are adequate procedures whereby the Grantee can receive tenant complaints and owners can appeal, should rental increases occur.
- No undue or excessive enhancement shall occur to the value of the dwelling unit.



- A properly executed energy audit with an energy conservation measure (ECM) of 1 or greater would not constitute an undue enhancement.

Grantees should include in this section how the conditions above are being enforced by their Subgrantee network.

To secure the federal investment and to address issues of eviction from and sale of property, per [10 CFR 440.22](#), Grantees may seek landlord agreement or placement of a lien (or other contractual restrictions) upon the property being weatherized.

In the case of multifamily buildings, additional elements of the procedure should include:

- Requirement of financial participation, when feasible, from owners of such buildings.
- Explanation of Grantee plan for weatherization of multifamily buildings with 50% income eligible units if proposing to use this level for buildings larger than fourplex.

### **Describe the Deferral Process (V.1.2 Box 5)**

The term “deferral” describes when an otherwise eligible dwelling unit (e.g., income eligible) cannot receive weatherization services due to certain occupant issues or dwelling characteristics that are beyond the scope of WAP. While clients may meet the eligibility requirements, it is important for Grantees to have clear and concise directions for the Subgrantees when a building should be deferred because the building is not a good candidate for weatherization. Grantee must provide a copy of their deferral policy, which minimally must contain:

- The circumstances/situations when an eligible dwelling may be deferred.
- The client notification and referral procedures, including how the home may be made weatherization ready.
- A deferral appeals process for the client.
- How client eligibility and priority will be addressed for deferred dwellings, including defined time limit before requalifying clients for the program becomes necessary.

DOE encourages Grantees to have a comprehensive deferral/referral tracking mechanism/process to allow for future evaluation of funding and leveraging activities. DOE has developed an optional [deferral tracking tool](#) that Grantees may choose to implement to assist in this activity that will assist Grantees to align deferral classification and terminology across regions while allowing for variation.

### **Weatherization Readiness Funds (WRF)**

Per H.R. 2471, the [Consolidated Appropriations Act, 2022](#) through this WRF set-aside, WAP can address necessary repairs (e.g., health and safety issues, structural issues) in dwellings and reduce the frequency of deferrals of home eligible for weatherization services. Deferrals occur in WAP for two key reasons: regulatory ([10 CFR 440](#)) limitations and/or management decisions at the state and local levels. Regardless of the cause, deferrals create “sunk costs”—the cost of sending field staff out to evaluate a home that cannot ultimately receive weatherization services because the Program is unable to address

the repairs of the building. WRF are allocated to Grantees using the T&TA distribution model and will be issued in WPN 24-2, Program Year 2024 Grantee Allocations.

As part of WRF funding, each Grantee must:

1. Develop a WRF Plan for DOE approval. The WRF Plan must describe the funding allocation method/distribution plan to Subgrantees and how households will be prioritized for WRF. Grantees must outline any restrictions related to the funding and describe how the Grantee will monitor WRF activities. Additionally, the WRF Plan must include a maximum amount per home or identify the WRF ACPU specific to the WRF budget category determined by each Grantee. NOTE: WRF funds are outside WAP's ACPU. **Please submit your WRF plan in Section V.1.2 Deferral Process of the PY 2024 Annual File.** DOE encourages Grantees to consult with Subgrantees and PACs when setting this policy for statewide application.
2. Track these funds for each building and unit, and at a minimum, capture measures/repairs and associated costs, for reporting purposes. See [WPN 23-4](#). WAP is subject to the Paperwork Reduction Act and final tracking requirements and data collection will follow the appropriate Information Collection Request (ICR) process to gain approval. DOE will solicit feedback from the WAP network. See [WAP Memorandum 111: Weatherization Assistance Program Data Collection Updates - REVISED](#).
3. Monitor these funds as part of the Grantee's annual monitoring of Subgrantees, ensuring the funds are expended in accordance with the Grantee's WRF plan for the purposes approved by DOE, ultimately resulting in completed units.

### **V.1.3 Definition of Children**

The definition of "children," chosen by the Grantee and consistent with [10 CFR 440.3](#), that the Grantee has chosen shall be provided as required by [10 CFR 440.14\(c\)\(6\)\(xiii\)](#). The selection of age in the plan becomes the basis used for reporting. Grantees are reminded that there should be consistency regarding age qualification.

### **V.1.4 Approach to Tribal Organizations**

Applicants shall include a statement, in accordance with [10 CFR 440.16\(f\)](#), that low-income members of an Indian Tribe will receive benefits equivalent to the assistance provided to other low-income persons within the state unless the applicant has made the recommendation provided in [10 CFR 440.12\(b\)\(5\)](#). In such a case, the applicant shall provide a recommendation that a Tribal organization be treated as a local applicant eligible to submit an application pursuant to [10 CFR 440.13\(b\)](#).

### **V.2 Selection of Areas to be Served**

Applicants shall provide, per [10 CFR 440.14\(c\)\(6\)\(ii\)](#), an explanation of the method used to select each area to be served by a weatherization project.

### V.3 Prioritizing Clients

Grantees shall clearly describe procedures for any priorities given to certain portions of the eligible population in receiving weatherization assistance. Specifically, as required by [10 CFR 440.16\(b\)](#), Grantees must define the criteria used by it and Subgrantees to prioritize clients for weatherization service. Grantees must develop criteria to ensure that the following applicant priority categories are addressed. Grantees have flexibility to determine how to prioritize these areas:

- High residential energy users
- Households with a high energy burden
- Elderly persons
- Persons with disabilities
- Families with children.

The categories listed are the **only** allowable priorities for WAP. Grantees are also expected to describe how applicants are drawn from a waiting list, given that all applicants are required to reverify for the program annually and thus the applications are no older than one year. The first consideration must be by priority category. Grantees then may choose to use the oldest application certification date for positioning applicants within the same allowable priority category. The timing of service to an applicant that is in a priority category may be set so services can be coordinated with other funding sources.

Consideration of “high residential energy users” [10 CFR 440.3](#) and “households with a high energy burden” (as defined in [10 CFR 440.3](#)) may be in combination with other priority categories of the elderly, persons with disabilities, or families with children. The consideration of “high residential energy users” and “households with a high energy burden” enables Grantees and Subgrantees to better partner with utilities and other programs to leverage additional resources into their programs. Grantees are encouraged to consider opportunities to pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.

Grantees must describe how they define high energy burden or high energy user (e.g., utility data, algorithm, etc.) in the Master File and report these priority categories in the QPR. DOE encourages assigning the highest priority to households with a high energy burden, as defined in [10 CFR 440.3](#). For regional energy burden metrics see the “Background Data and Statistics on Low-Income Energy Use and Burden for the Weatherization Assistance Program: Update for Fiscal Year 2020” ([ORNL/TM-2020/1566](#)). This report will be updated as new information is available.

Housing type is not a recognized priority under the regulations, and use of housing type as a priority may be contrary to the requirement for high residential energy users to be considered as a priority in evaluating service delivery ranking of eligible households. Grantees and Subgrantees may not discriminate because of the type of home where the low-income family lives. All other issues related to eligibility still apply.

## V.4 Climatic Conditions

Per [10 CFR 440.14](#), Grantees must describe the climatic conditions within the state, including a map or table showing the heating degree days and cooling degree days (if cooling measures are considered) in each area served by a weatherization project. Climate data in units other than heating and cooling degree days may be provided if desired. Sources of climate data are to be listed. A brief explanation shall be given of how climatic variances within the state affect the weatherization of eligible units (e.g., site-specific client files used in computerized energy audits).

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

### V.5.1 Technical Guides and Materials

All technical guides (for all single-family, manufactured housing (mobile homes), and multifamily buildings, as applicable) and materials must meet the specifications, objectives, and desired outcomes outlined in the [Standard Work Specifications \(SWS\) for Home Energy Upgrades](#) (refer to [WPN 22-4](#), for additional details). These documents shall include field guides, and may include program updates, procedures manuals, standards documents, etc.

- Grantees will provide an electronic link to or an electronic copy of—or post an electronic copy in their PAGE Document Library of—their current, DOE approved field guide and/or standards for single-family, manufactured housing (mobile homes), and multifamily buildings, as applicable. The field guide approval date in PAGE is entered and maintained by the DOE PO.
- Grantees must provide DOE with documentation confirming that these materials have been received by all Subgrantee agencies and direct-hire contractors. Grantees are encouraged to provide an electronic link to, or electronic copy of any other relevant program guidance materials that are provided to Subgrantees by the Grantee.

Provide a statement that all Subgrantee agreements and vendor contracts, will **contain language which clearly documents the SWS for work quality outlined in [WPN 22-4, Section 1](#)**. Grantee must include a statement declaring all work is being performed in accordance to the DOE-approved energy audit procedures and [10 CFR 440 Appendix A](#). All materials that are approved for use that are not included in Appendix A must be listed in this section. **Grantees must provide language to be included in Subgrantee contracts that outlines the expectations for work quality and instructs the Subgrantee to include these expectations in any contracts entered into with contractors and vendors.**

### NEPA Determination & Historic Preservation

- Grantees must ensure that all weatherization activities are allowable. Activities not included in the list of “Allowable Activities” in the NEPA determination must be excluded or an [Environmental Questionnaire](#) (EQ)-1 must be submitted for review per NEPA requirements in [10 CFR Part 1021](#) (e.g., multifamily solar photovoltaic systems over 60 kW).
- DOE has developed a NEPA training website with PowerPoint presentations, sample template documents (including a NEPA log, project scope of work, and a project layout), Word document of an Environmental Questionnaire-1 (EQ1), and an EQ1 submission guide. Grantees are responsible

for reviewing the online NEPA training and sample documents located [here](#), prior to initiating projects and contacting NEPA with any questions at [GONEPA@ee.doe.gov](mailto:GONEPA@ee.doe.gov). Subgrantees, contractors, and local weatherization providers are encouraged to review the training website.

- All Grantees must follow the restrictions for the listed allowable activities and historic preservation in their NEPA determination. Grantees with a Historic Preservation PA must adhere to the restrictions of their DOE-executed PA. Grantees without a PA are restricted to activities on structures less than 45 years old and not on Tribal land, until DOE reviews and approves those activities. Grantees should review their NEPA determination and Historic Preservation PA, as applicable to ensure they are compliant with all restrictions.

### **V.5.2 Energy Audit Procedures**

In accordance with [10 CFR 440.21\(i\)](#), all Grantees must resubmit their energy audit procedures (and priority list(s), if applicable) to DOE for approval every five years. If the Grantee energy audit procedures (and priority lists(s)) are not in compliance with this requirement, a corrective action plan must be submitted with this grant application. [WPN 23-6](#) requires that Grantees submit energy audit approval requests at least 6 months in advance of the expiration date. Grantees must allow time for the development/approval process and field training for updated energy audit procedures prior to the five-year expiration date. At a minimum, the Grantee must provide a statement in the Grantee Plan indicating commitment to comply with this requirement. DOE specifically requires energy audit procedures to be separately developed and approved for use on site built single-family housing types and manufactured home (mobile home) housing types.

If re-approval is required within this PY, Grantee should identify in the comment box what steps it is taking to obtain re-approval including milestones and a timeline, and the estimated date of submission. The date of last approval for both the energy audit process and priority list(s), if applicable, including H&S protocols is maintained by the DOE PO.

Detailed guidance is provided in [WPN 23-6](#), Revised Energy Audit Approval Procedures, Related Audit, and Material Approvals.

### **Multifamily**

Where multifamily dwelling units represent more than 20 percent of a Grantee's reported completed units, DOE requires the Grantee to submit a multifamily energy audit tool and procedures. The multifamily audit process approval date is maintained by the DOE PO. For Grantees that fall below the 20 percent threshold and do not have a DOE-approved multifamily energy audit tool and procedures, a Grantee must take two actions:

- Describe in the Grantee Plan the approach that will be taken to ensure that the eligible occupants of multifamily dwellings receive appropriate, cost-effective weatherization services.
- At the time a multifamily project is considered, the Grantee must submit to the DOE PO the necessary material to approve the multifamily project prior to commencing weatherizing the building (e.g., engineering assessment, energy audit input/output). The DOE PO will review and

approve/reject the project(s) on a case-by-case basis in the absence of an approved multifamily energy audit tool.

These approvals are categorized into two types of multifamily projects, small multifamily (5-24 units, individually heated/cooled and ventilated) and large multifamily (25+ units, or any central mechanical systems). If the Grantee does not have a multifamily energy audit tool and process approved, estimate in the comment box what percentage of the units the Grantee weatherizes are multifamily, describe what approach the Grantee will take to ensure this housing stock is served, and provide a statement to verify the Grantee understanding of the process to be followed to have projects approved on a case-by-case basis.

### **V.5.3 Final Inspection**

Grantees shall describe their procedures to ensure that no dwelling unit is reported to DOE as completed until all weatherization measures have been installed in a workmanlike manner and in accordance with the priority determined by the energy audit procedures, required by [10 CFR 440.21](#), and the Subgrantee, or its authorized representative, has performed the final inspection.

Grantees must ensure that all Subgrantee final inspections are performed by certified QCI as outlined in [WPN 22-4](#) and as stated in the DOE approved written Grantee Quality Control Inspection Policy.

- Grantees will provide a copy of relevant policies and procedures that will govern the quality control inspection process in accordance with [WPN 22-4, Section 2](#) including how the final inspection must assess the energy audit that confirms the accuracy of the field site data collection, energy audit software inputs, and that measures called for on the work order were appropriate and in accordance with the Grantee's energy audit procedures and protocols approved by DOE and outline disciplinary actions for inadequate inspection practices. This should include a description of how the inspector is related to the work being done on the home (i.e., did they also complete the energy audit or are they an independent third-party?) as well as the percentage of homes that will be included in the Grantee monitoring process.
- Grantees will provide copies of the monitoring inspection forms that will be used by Grantee monitors to ensure that work is completed in accordance with the work quality requirements outlined in [Weatherization Program Notice 22-4: Quality Work Plan Requirement Update](#).

Individuals conducting technical monitoring at the Grantee level are required to have an active QCI certification and possess skills outlined in the [NREL Job Task Analysis \(JTA\) for QCIs](#). The Grantee will provide copies of the QCI certification of technical monitors or other documentation as an attachment to the SF-424 for how this requirement is being met.

### **V.6 Weatherization Analysis of Effectiveness**

An analysis must be provided by the Grantee, per [10 CFR 440.14\(c\)\(6\)\(i\)](#), of the existence and effectiveness of any weatherization projects being carried out by the Subgrantee(s). This analysis may include analyses that are done on an annual basis but may also include special analyses that are conducted

based on current events. Grantees must describe in detail plans for analysis of effectiveness activities during this PY and beyond.

Examples of activities that DOE encourages include the following:

- Has the Grantee/Subgrantee effectively integrated diversity, equity, and inclusion objectives into the Program? If so, how (e.g., foster a welcoming and inclusive environment; support people from underrepresented groups in weatherization; encourage the inclusion of individuals from these groups as part of the workforce; update allocation formulas, priority of service definitions, or other program policies and documents; etc.)?
- Is the Grantee conducting realized energy savings studies?
- How is the Grantee assessing effectiveness of Subgrantee weatherization?
- How is the Grantee assessing training needs and how is the Grantee using the comparisons in the development of T&TA activities and priorities?
- How is the Grantee incorporating monitoring feedback?
- How does the Grantee maintain continuous improvement?
- How is the Grantee tracking Subgrantee performance reviews?
- If a Subgrantee has failed final inspections, how are things improving?
- If a Subgrantee has management findings or concerns cited because of Grantee monitoring or audit proceedings, how are things improving?
- What internal controls will be implemented this year to affect improvement?
- Are there technical and financial systems that have been reviewed?
- Has the Grantee performed a market analysis to ensure measures are being costed accurately?

DOE adheres to the transparency requirements placed on these and other government financial assistance programs instituted by the Administration. DOE will work diligently with any state WAP or local service provider to gather the required information and provide it to the requestor. However, DOE must comply with all requirements of the Government to protect the privacy interests of individuals who participate in these financial assistance programs. In accordance with [2 CFR 200.338](#) Retention requirements for records, “No Federal awarding agency may place restrictions on the non-Federal entity that limit public access to the records of the non-Federal entity pertinent to a Federal award, except for protected personally identifiable information (PII) or when the Federal awarding agency can demonstrate that such records will be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) or controlled unclassified information pursuant to Executive Order 13556 if the records had belonged to the Federal awarding agency. The Freedom of Information Act (5 U.S.C. 552) (FOIA) does not apply to those records that remain under a non-Federal entity's control except as required under [2 CFR 200.315](#). if the records had belonged to DOE.”

DOE would be legally required, pursuant to 5 U.S.C. 552(b)(6), of the Freedom of Information Act, to keep confidential any specifically identifying information related to an individual’s eligibility application for WAP, or the individual’s participation in WAP, such as name, address, or income information. Thus, states and local service providers should extend that same protection to their client

records for WAP. States may release information about recipients in the aggregate which does not identify specific individuals. For example, information on the number of recipients in a county, city, or a zip code does not compromise the privacy of the recipients.

## **V.7 Health and Safety (H&S)**

The [final rule](#), published March 4, 1993, revised the purpose and scope of WAP to improve the health and safety of low-income persons served by the Program, especially those that are particularly vulnerable such as the elderly, persons with disabilities, and children. Health and safety appears in three sections of the regulations [10 CFR 440.16](#), [10 CFR 440.18](#) and [10 CFR 440.21](#). The H&S Plan may be a separate attachment to the SF-424 in PAGE.

DOE recommends, in developing the Plan, Grantees use the H&S template located on the DOE [H&S Template](#), which is updated periodically. It may be difficult to address all required elements in the H&S Plan without following the template. In addition to addressing all elements contained in [Weatherization Program Notice 22-7 Table of Issues](#), Grantees should make specific note of any items that are being removed (or conditionally removed) from the H&S category and instead, meet the definition of Incidental Repair Measures (IRM) in [WPN 19-5](#) and will be charged as IRMs.

The Grantee's H&S Plan will also include any other health and safety related policies or procedures including:

1. Occupant Pre-existing or Potential Health Condition Screening
2. Hazard Identification Notification Form
3. Radon Informed Consent Form.

## **V.8 Program Management**

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

Applicants shall provide a brief description of the Grantee organization that operates the Weatherization Program. The description shall illustrate how weatherization activities are structured within the organization, the organization of the weatherization office (program managers, monitors, admin, etc.), and show the relationship of the weatherization organization to other units of the state government (e.g., whether the agency operating WAP is also responsible for the State Energy Program (SEP), LIHEAP, other housing programs, etc.).

If an Applicant intends to conduct a competitive process to select Subgrantees to participate within the following PY, it must describe (1) the activities it intends to undertake during this PY to develop the competitive solicitation, (2) the criteria that will be used to determine whether a current Subgrantee is providing effective service; and (3) a timeline for the competitive selection process. The Applicant shall provide a copy of any Request for Proposal or similar document to DOE for review prior to release.

If applicable, applicants may also reference in this section any manuals that are relevant to WAP operations.



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

Under [10 CFR 440.18\(e\)](#) for administrative purposes—no more than 7.5% of the new PY allocation may be used by the state, and not less than 7.5% must be made available to Subgrantees. However, a state may provide up to an additional 5% to Subgrantees receiving grants of less than \$350,000 of the new total PY allocation funds. In other words, a state may make available up to 12.5% to certain qualified Subgrantees. In these special cases, a total of up to 20% of the grant would be allowable for administrative purposes. Should the state elect this option, Grantees must describe the procedures used by the Grantee for approval to provide additional administrative funds to qualified Subgrantees as specified in [10 CFR 440.18\(d\)](#). For additional guidance on the administrative allowances, please refer to the Administrative Categories in section III.2.

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

Grantees shall follow [WPN 20-4](#) in filling out the monitoring section. This section must address monitoring activities specific to the current PY.

- Describe in detail the Grantees policies and procedures (which include resolution strategies/corrective action plans if issues are identified) for:
  - Technical Monitoring
  - Subgrantee Monitoring (included both Programmatic & Management and Technical)
  - Financial Monitoring.
- Indicate the staff dedicated to the monitoring effort and identify whether they are technical or administrative monitors. Include credentials of monitors (e.g., certifications).
- Grantees must indicate the percentage of Admin and/or T&TA funds allocated for monitoring activities.
- Grantees must describe and provide their monitoring schedule in detail indicating not only frequency of visits, but also a tentative schedule on when these visits may occur in the current PY.

### **V.8.4 Training and Technical Assistance (T&TA) Approach and Activities**

Grantees shall indicate the methods used to provide T&TA to Subgrantees, and the methods employed to ensure quality of work and adequate financial management control at the Subgrantee level. While the overall approach to training, technical assistance, and monitoring may be constant, budgets and activities may change from year to year. For this reason, this section must contain a detailed description of the activities to be undertaken during the PY with funds budgeted for training, technical assistance, and monitoring on SF-424A under either T&TA or Administrative cost categories.

#### **T&TA Activities**

DOE recommends utilizing the [T&TA Planning Tools—Voluntary Templates webinar](#) and the [WAP T&TA Planning & Reporting template](#) to assist in capturing all of the key information required for the T&TA plan and reporting. Such activities must be designed to maximize energy savings, minimize production costs, improve program management and crew/contractor “quality of work,” and/or reduce the potential for waste, fraud, abuse, and mismanagement. Subgrantees should be the primary recipients

of T&TA activities, although Grantee requirements for monitoring, training support, and providing assistance must also be maintained.

DOE requires Grantees to identify their plans for their overall training: comprehensive and specific training as a percentage and across job task analysis as a percentage. Each section should add up to 100%.

Grantees must ensure that all training paid for with WAP T&TA funds meet the requirements of [WPN 22-4, Section 3: Workforce Training](#).

- Grantees must provide a training plan that provides an analysis of training needs within the Grantee’s program and a description of how the Grantee will ensure that all individuals trained with WAP funds will receive regular, comprehensive training in accordance with [WPN 22-4](#).
- Grantees must ensure their respective PY 2024 Training Plans include a provision to provide Comprehensive training aligned to the job task analysis of their profession (i.e., QCI Energy Auditor, Crew Leader, and Retrofit Installer) on a regular basis for all field workers.

**Please note:** Training plans can span multiple program years. The Grantee decides which categories of workers will be trained and the frequency of that training.

Grantees must describe the proposed training plan and milestones necessary to ensure the training plan is on pace to be accomplished. At a minimum, the plan must also address the following elements:

### Overall T&TA Plan

- Describe how the T&TA plan reflects:
  - Feedback from DOE PO monitoring visits
  - Internal state audits
  - Grantee monitoring of the Subgrantees
  - Inspector General (IG) reports
  - American Customer Satisfaction Index feedback
  - Other (e.g., Training Feedback, Training Retention Activities).
- Describe the existing or planned Training Center partnership or working relationship.
- Describe your preparations for future/upcoming program requirements (e.g., updated SWS, Online Weatherization Assistant).
- Describe the protocols that ensure staff do not function unsupervised until federal, Grantee, and Subgrantee training and certification requirements are met.
- Describe your partnerships with the statewide home performance industry on training issues, if applicable.
- Describe how analysis conducted as detailed in Section V.6 of this application informs the development of T&TA activities and priorities.

## Workforce Credentials

- Describe:
  - All required credentials
  - The process for maintaining workforce credentials
  - The process on how credentials are tracked. Please specify by category:
    - Federal requirements (e.g., Environmental Protection Agency (EPA) Renovate Right Procedures, Occupational Safety and Health Administration (OSHA), QCI certification)
    - State requirements (e.g., Building Performance Institute (BPI) Building Analyst, Grantee-developed certifications,)
    - Local requirements (e.g., Contractor licensing)
    - Industry requirements (e.g., Equipment/Material Manufacture Certification, Vendor Certification).

## Training

- Identify and describe the training schedule for *Grantee and Subgrantee* staff.
  - Specify whether attendance is mandatory, and the ramifications for noncompliance.
  - If the T&TA plan spans multiple PYs, indicate which trainings are planned/intended in the current PY and which are planned for future PYs.
- Include technical and non-technical training, e.g.:
  - a. Financial/Programmatic Training
    - i. Financial (i.e., 2 CFR 200)
    - ii. Programmatic (i.e., 10 CFR 440)
    - iii. Conferences/General (i.e., National Community Action Partnership (NCAP), Energy OutWest (EOW), Building Performance Association (BPA), National Association of State and Community Service Providers (NASCSPP).
  - b. Technical Training.
    - i. Comprehensive Training aligned to the job task analysis (identify at what intervals workers will receive regular, comprehensive training as required by [WPN 22-4](#))
      - 1. QCI
      - 2. Energy Auditor
      - 3. Crew Lead (or partial if using updated job task analysis, for Installers)
      - 4. Retrofit Installer/Technician.
    - ii. Specific Training.
      - 1. Topics identified during monitoring visit
      - 2. Energy Modeling
      - 3. Client Education (training workers to conduct client education)
        - a. Energy Savings strategies
        - b. Program-specific information (e.g., what to expect)
        - c. Health and safety related client education

4. Health & Safety
  - a. ASHRAE
  - b. Renovate Right Procedures
  - c. Mold/moisture
  - d. Asbestos
  - e. Additional topics as described in the H&S Plan
5. Conferences
6. Other—please specify.

### Technical Assistance

- Describe the technical assistance activities included in this budget category:
  - Financial/Programmatic Support
  - Technical Support
  - H&S Support Activities
  - Monitoring
  - Other—please specify.

### Client Education

- Describe what current and planned client education materials and/or activities are included in the T&TA budget category, (e.g., client education, website, packets, and open houses.) Note: this does not include training workers to deliver client education. Training workers to deliver client education should be described in the Training section above.

In addition, T&TA funds may also be used to train contractors at the Subgrantee level participating in the Program. The use of T&TA funds to reimburse contractors is limited to T&TA that supports the four Home Energy Professionals occupations (i.e., Retrofit Installer Technician, Crew Leader, Energy Auditor, and QCI). The T&TA Plan must describe contractor T&TA activities, including:

- Description of the training topics/courses to be provided for contractors.
- Assessment of need, including estimated number of contractor employees that will attend training.
- T&TA reimbursement types and amounts.
- Description of the impact contractor reimbursements have on T&TA budget.

Guidelines for developing a policy for contractor T&TA reimbursements:

- As applicable, contractor must be selected in accordance with [2 CFR 200](#) compliant procurement policies and procedures.
- Subgrantees must clearly communicate how training will be paid for during the procurement process, so contractors know what costs to exclude and include in the bid. Training must either be included in the contractor's overhead or reimbursed per the approved T&TA Plan, not both.
- Subgrantees must clearly communicate the T&TA reimbursement policies and procedures in a binding agreement with the contractor.
- All funds used for contractor reimbursements must be from the T&TA budget line item.

- Reimbursement for the time to attend training must be reasonable and based on Subgrantee-specific labor rates or other available data.
- Travel reimbursements must be based on actual costs, the [GSA Per Diem Rates](#), or equivalent Grantee or Subgrantee-specific travel policy.
- The plan should set limits and thresholds for contractor reimbursements, for example:
  - A fixed dollar amount per day of training or per training course.
  - Total dollars to a contractor firm.
  - Course or exam fees per trainee.
  - Limits on the number of exam retakes that will be reimbursed. Apply an exam retake policy consistently to Subgrantee employees and contractors.
- All applicable prerequisites are required to be eligible for the Energy Auditor and QCI exams.

Reimbursement should be provided per a contractually agreed upon timeline following completion of the T&TA activity including any requisite submitted documentation.

In making the determination to pay for contractors' training, Grantees and Subgrantees should secure a retention agreement in exchange for the training. The retention agreement should require that contractors work in the Program for a specific amount of time that equates to the value of the costs associated with the T&TA provided.

Examples of contractor/agency retention agreements can be found on WAP's website under the [Weatherization Assistance Program Grantee Manager's Training Toolkit](#), specifically [here](#), or can be obtained from the DOE PO by request.

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

By including the Grantee's energy crisis and disaster plan as it relates to WAP within this Grantee Plan process, Grantees can free up resources and respond more quickly in the event of an energy crisis or disaster.

DOE does not waive regulations for an energy crisis or disaster; therefore, Grantees must demonstrate within this plan an understanding of the limitations and flexibility available to the Grantee and Subgrantee network in the use of WAP resources. Grantee should also indicate how an energy crisis or natural disaster plan is triggered (e.g., federal declaration).

The use of WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials. Allowable expenditures under WAP include:

1. The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
2. The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials ([10 CFR 440.18\(d\)\(9\)](#); [10 CFR 440.18\(d\)\(15\)](#)).

To the extent that the services are in support of eligible weatherization (or permissible reweatherization) work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost. Please note the following still apply:

- ACPU limit(s)
- Allowable uses for Weatherization Readiness Funds (WRF), as outlined in the Grantee Plan
- Requirements around incidental repairs ([10 CFR 440.14\(c\)\(6\)\(viii\)](#)).
  - The Grantee must also develop, publish, and implement procedures to ensure that Subgrantees limit expenditure of funds for installation of materials (other than weatherization materials) to abate energy-related health and safety hazards to a list of types of such hazards, permissible abatement measures and their costs necessary ([10 CFR 440.16\(h\)](#)). As such, Grantees should ensure that the limits on the use of WAP funds to address disaster related hazards are included in the approved Grantee Plan.
- Use of agency weatherization vehicles and/or equipment.
  - Costs to help assist in disaster relief must be appropriately allocated according to the Uniform Guidance of [2 CFR 200.405](#).
- Priority assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens ([10 CFR 440.16\(b\)](#)).
  - It would be permissible to consider in households located in the disaster area, as a priority if the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

**Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment.** Such activities include securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records, and the like during the initial phase of the disaster response. **However, using DOE funds to pay for weatherization personnel to perform relief work in the community because of a disaster is not allowable.**