

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0009981		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law	
3. Name and Address Georgia Environmental Finance Authority 47 Trinity Ave SW Atlanta, GA 303340000	4. Program/Project Start Date 07/01/2022		
	5. Completion Date 06/30/2027		

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Federal	81.042	\$ 0.00		\$ 84,313,639.00		\$ 84,313,639.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 84,313,639.00	\$ 0.00	\$ 84,313,639.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 625,854.00	\$ 0.00	\$ 1,162,300.00	\$ 0.00	\$ 1,788,154.00
b. Fringe Benefits	\$ 370,074.00	\$ 0.00	\$ 687,282.00	\$ 0.00	\$ 1,057,356.00
c. Travel	\$ 0.00	\$ 0.00	\$ 454,159.00	\$ 0.00	\$ 454,159.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 2,608,351.00	\$ 7,588,227.00	\$ 5,938,360.00	\$ 4,420,392.00	\$ 77,487,284.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 608,000.00	\$ 0.00	\$ 500,000.00	\$ 0.00	\$ 1,108,000.00
i. Total Direct Charges	\$ 4,212,279.00	\$ 7,588,227.00	\$ 8,742,101.00	\$ 4,420,392.00	\$ 81,894,953.00
j. Indirect Costs	\$ 846,539.00	\$ 0.00	\$ 1,572,147.00	\$ 0.00	\$ 2,418,686.00
k. Totals	\$ 5,058,818.00	\$ 7,588,227.00	\$ 10,314,248.00	\$ 4,420,392.00	\$ 84,313,639.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 84,313,639.00	\$ 0.00	\$ 84,313,639.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4)	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00		\$ 1,788,154.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00		\$ 1,057,356.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00		\$ 454,159.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
f. Contract	\$ 46,324,202.00	\$ 10,247,752.00	\$ 360,000.00		\$ 77,487,284.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 1,108,000.00
i. Total Direct Charges	\$ 46,324,202.00	\$ 10,247,752.00	\$ 360,000.00		\$ 81,894,953.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 2,418,686.00
k. Totals	\$ 46,324,202.00	\$ 10,247,752.00	\$ 360,000.00		\$ 84,313,639.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00

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**IV.1 Subgrantees**

<b>Subgrantee (City)</b>	<b>Planned Funds/Units</b>
action pact (Waycross)	\$6,531,410.44 545
Area Committee To Improve Opportunities Now Inc. (Athens)	\$12,942,321.70 1,086
Central Savannah River Area Economic Opportunity Inc. (Augusta)	\$4,130,860.56 345
Clayton County Community Services Authority Inc. (Forest Park)	\$3,435,813.66 290
Coastal Georgia Area Community Action Authority Inc. (Brunswick)	\$2,147,872.45 181
Coastal Plain Area Economic Opportunity Authority Inc. (Valdosta)	\$2,714,401.15 226
Community Action for Improvement Inc. (LaGrange)	\$4,648,561.10 390
Middle Georgia Community Action Agency Inc. (Warner Robins)	\$5,882,921.00 485
Ninth District Opportunity Inc. (Gainesville)	\$4,007,244.15 336
North Georgia Community Action Inc. (Jasper)	\$3,946,114.30 332
Overview Inc. (Milledgeville)	\$1,555,040.20 152
Southwest Georgia Community Action Council Inc. (Moultrie)	\$4,167,003.00 343
Tallatoona Community Action Partnership Inc. (Cartersville)	\$10,821,984.10 911
West Central Georgia Community Action Council Inc. (Montezuma)	\$2,009,025.19 168
<b>Total:</b>	<b>\$68,940,573.00</b> <b>5,790</b>

**IV.2 WAP Production Schedule**

Weatherization Plans	Units	
Total Units (excluding reweatherized)	5,790	
Reweatherized Units	0	
Average Unit Costs, Units subject to DOE Project Rules		
<b>VEHICLE &amp; EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)</b>		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	5,790
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	5,790
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
<b>AVERAGE COST PER DWELLING UNIT (DOE RULES)</b>		

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F	Total Funds for Program Operations	\$46,324,202.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	5,790
H	Average Program Operations Costs per Unit (F divided by G)	\$8,000.73
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$8,000.73

**IV.3 Energy Savings**

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)				
		Units	Savings Calculator (MBtus)	Energy Savings
	This Year Estimate	5790	29.3	169647
	Prior Year Estimate	357	29.3	10460
	Prior Year Actual	685	29.3	20070
<b>Method used to calculate savings description:</b>				
Applicants shall provide an estimate of the amount of energy to be conserved, pursuant to §440.14(c)(4). Grantees should indicate the methodology used to determine the energy savings.				
Table 4: DOE Algorithm for computing energy savings.				
<b>DOE Program</b>	<b>Amount</b>	<b>Line</b>		
Total DOE State WAP Allocation	\$4,842,022	(a)		
Total Cost associated with Administration, T&TA, Financial and Energy Audits, Health and Safety, Liability Insurance or 15% of allocation	\$1,921,752	(b)		
Subtract the amount entered in line (b) from line (a), for Total Federal (DOE) funds available to weatherize homes	\$2,920,270	(c)		
State Average Cost per Unit or National WAP Program Year Average Cost per Home	\$4,544	(d)		
Divide the amount entered on line (c) by the amount entered on line (d), for Total Estimated Homes to be Weatherized	642	(e)		
Multiply (e) by 29.3 MBTU for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	18,810	(f)		
Total funds (e.g., DOE-WAP, PVE, State, Leveraged, LIHEAP & Other non-Federal sources of funds) used by the State to weatherized homes	\$10,107,318	(g)		
Total cost associated with the administration of Weatherization funds or 15% of total funds available to weatherize homes	\$1,516,098	(h)		
Subtract the amount entered in line (h) from line (g), for total funds available to weatherize homes	\$8,591,220	(i)		
State Average Cost per Unit or National WAP Program Year Average Cost per Home	\$4,544	(j)		
Divide the amount entered on line (i) by the amount entered on line (j), for Total Estimated Homes to be Weatherized	1,890	(k)		
Multiply (k) by 29.3 MBTU for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	55,377	(l)		

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

No leveraged funds are identified for this program year.

**IV.5 Policy Advisory Council Members**

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

Consuela Thompson	Type of organization: Non-profit (not a financial institution) Contact Name: Consuela Thompson Phone: 4043614442 Email: <a href="mailto:cthompson@georgiacaa.net">cthompson@georgiacaa.net</a>
Cynthia Bryant	Type of organization: Unit of State Government Contact Name: Cynthia Bryant Phone: 4044631679 Email: <a href="mailto:cynthia.bryant@dhs.ga.gov">cynthia.bryant@dhs.ga.gov</a>
Cyrus Bhedwar	Type of organization: Non-profit (not a financial institution) Contact Name: Cyrus Bhedwar Phone: 4046029659 Email: <a href="mailto:cbhedwar@seealliance.org">cbhedwar@seealliance.org</a>
Danny Penland	Type of organization: Local agency Contact Name: Danny Penland Phone: 7705323191 Email: <a href="mailto:danny.penland@ndocsbg.org">danny.penland@ndocsbg.org</a>
Dusniel Alvarez	Type of organization: Local agency Contact Name: Dusniel Alvarez Phone: 2299853610 Email: <a href="mailto:dalvarez@swgacac.com">dalvarez@swgacac.com</a>
Empire Construction Group	Type of organization: Other Contact Name: George Tunningly Phone: 4045841135 Email: <a href="mailto:empireconstgroup@yahoo.com">empireconstgroup@yahoo.com</a>
John Tyno	Type of organization: Local agency Contact Name: John Tyno Phone: 2292419161 Email: <a href="mailto:jtyno@coastalplain.org">jtyno@coastalplain.org</a>
Karan Pol	Type of organization: Local agency Contact Name: Karan Pol Phone: 6783837774 Email: <a href="mailto:kp@psequity.org">kp@psequity.org</a>
Katie Perumbeti	Type of organization: Unit of State Government Contact Name: Katie Perumbeti Phone: 4703781668 Email: <a href="mailto:KPerumbeti@atlantaregional.org">KPerumbeti@atlantaregional.org</a>
Keesha Johnson	Type of organization: Local agency Contact Name: Keesha Johnson Phone: 7069451616 Email: <a href="mailto:kjohnson@csraeo.org">kjohnson@csraeo.org</a>

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

Date Held	Newspapers that publicized the hearings and the dates the notice ran
09/02/2022	The public hearing was posted on <a href="http://www.gefa.georgia.gov">www.gefa.georgia.gov</a> and was advertised in the Fulton County Daily Report 14 days in advance of the hearing.
09/08/2022	The WAP Policy Advisory Council (PAC) meeting to give BIL Plan updates and progress was held. Next meeting schedule after Public Hearing. The minutes of the PAC meeting are uploaded into the SF-424
09/16/2022	The public hearing for the Georgia WAP State Plan will be held on 9/16/2022.
09/20/2022	The WAP Policy Advisory Council (PAC) meeting to give BIL Plan updates and progress was held. Next meeting schedule after Public Hearing. The minutes of the PAC meeting are uploaded into the SF-424.

**IV.7 Miscellaneous**

<b>Recipient Business Officer -</b> Kristofor Anderson
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**(Grant Number: EE0009981, State: GA, Program Year: 2022)**

Energy Division Director  
Georgia Environmental Finance Authority  
kanderson@gefa.ga.gov  
404-584-1031

**Recipient Principal Investigator-**

Kristofor Anderson  
Energy Division Director  
Georgia Environmental Finance Authority  
kanderson@gefa.ga.gov  
404-584-1031

**Policy Advisory Council -**

Pursuant to 10 CFR Part 440.17, GEFA has established a Policy Advisory Council (PAC) to assist in the development and operation of the program and provide advice on the development of the State Plan. The PAC is representative of subgrantees, energy advocates, state agencies, and other organizations that represent low-income, elderly persons, and disabled clients in Georgia. PAC members are well-versed in energy and housing issues.

**Other Funding Sources -**

The amount of LIHEAP funds available for weatherization during the 2022 program year is \$6,741,408. LIHEAP funds are used in accordance with the Georgia Department of Health and Human Services approved LIHEAP application and applicable U.S. DOE and Georgia State Plan rules and regulations. Georgia has executed an HHS LIHEAP 2022 contract for WAP and ARPA services.

**Production-Average Cost Per Unit -**

The ACPU in the 2022 plan is determined by the allowable average cost per unit of \$8,009 per WPN 22-1. Georgia has worked to increase the ACPU each year. GEFA performs desk monitoring monthly on agency spend and production and tailors the monitoring schedule after historical production and trending out current production.

**Direct Costs -**

Direct costs (including personnel) will be paid for by funds other than DOE, such as DHS LIHEAP funds.

**Buy Buy American Provisions**

Georgia is prepared to implement the Buy American Provisions per Department of Energy guidelines when they are available. Using our current communication channels, Georgia will provide guidance to the Weatherization Provider Network on the appropriate process and documentation to ascertain and document compliance.

**Fuel Switching**

Georgia has been approved to authorize Fuel Switch request within the network. These are reviewed on a case-by-case basis to determine cost effectiveness in each particular circumstances.

GEFA will continue stakeholder engagement regarding BIL and its best uses for the WAP Network.

**Davis Bacon Provision**

Any BIL-funded weatherization work on multifamily buildings with no fewer than 5 units will be required to pay wages to all laborers and mechanics engaged in the construction, alteration, or repair of those multifamily buildings (whether employed by a contractor or subcontractor) wages "at rates not less than those prevailing on similar projects in the locality, as determined by the Secretary of Labor." DOE will issue additional guidance as soon as it is available.

GEFA will incorporate Davis-Bacon requirements into its program management and accounting/tracking systems to ensure all laborers and staff employed by contractors and subcontractors on multifamily building projects with no fewer than 5 units funded directly by or assisted in whole or in part by and through the federal government pursuant to the BIL shall be paid wages at rates not less than those prevailing on similar projects as determined by the Secretary of Labor.

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

**V.1 Eligibility**

**V.1.1 Approach to Determining Client Eligibility**

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

A family unit income is defined as being at or below 200 percent of the poverty level as specified in the most current version of DOE's Federal Guidelines and Definitions of Income. All dwelling units to be weatherized shall be determined eligible in such a manner to ensure that each weatherized unit meets the qualifications of 10 CFR 440.22, for eligible dwelling units. Eligibility may be categorical or traditional.

Categorical Eligibility:

WAP's expansion of categorical income eligibility includes HUD means-tested programs. Categorical eligibility applies when one or more persons living in the unit has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law at any time during the 12 - month period preceding the determination of eligibility for weatherization assistance. Or one or more persons in the unit is eligible for assistance under the Low Income Home Energy Assistance Act , provided that such basis is at or below 200 percent of the poverty level.

Traditional Eligibility:

Traditional eligibility applies to any household whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the director of the Office of Management and Budget for the 12 months preceding the application.

Describe what household eligibility basis will be used in the Program

A household shall be defined as a family unit meeting the qualifications above in order to be eligible for weatherization. In Georgia, any household meeting either categorical or traditional eligibility would be eligible to receive weatherization benefits by the Weatherization Assistance Program (WAP).

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

Georgia will follow the policies outlined in Georgia Security and Immigration Compliance Act (GSICA) O.C.G.A. Section 50-36-1 (e) (2), located at <http://www.lexisnexis.com/hottopics/gacode/> when determining eligibility of qualified and non-qualified aliens. Georgia will not deny access to any alien, state or local benefits that meet the definition of excepted services described in 8 U.S.C Section 1611(a).

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

Procedures to determine that units weatherized have eligibility documentation

The applicant must provide income documentation satisfactory to the subgrantee outreach worker that demonstrates the household meets the eligibility requirements. The documentation must be maintained in the client file and made available for inspection by subgrantee and state staff. Applicant income must be verified for the one-year period prior to the certification month. In accordance with DOE Weatherization Program Notice (WPN)23-3, income data for a part of a year may be annualized in order to determine eligibility. For example, by multiplying by four the amount of income received during the most recent three months.

The method of calculation is to be determined by the subgrantee and should be uniformly applied when possible. Tax forms may be used to verify income only if the certification period is from January through December. Applications on file for one year or more must re-certify income for the year prior to pre-inspection. Applicant eligibility verification shall be documented in the file and shall include, at minimum, (1) which 12-month period was considered, (2) a list of all sources of applicant income, (3) documentation of income from each source for the period(s) being considered, and (4) the date and initials of the subgrantee employee verifying income.

Describe Reweathering compliance

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Dwelling units weatherized under federal programs, may not receive further financial assistance for weatherization until the date that is 15 years after the date such previous weatherization was completed.

Georgia uses Hancock software system to track homes that have been previously weatherized. Subgrantees are required to check Hancock prior to starting work to ensure the unit has not been weatherized within the last 15 years under federal programs.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single family, manufactured housing, and multi-family housing. All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible.

Additionally, every dwelling weatherized must meet both the client eligibility and the building eligibility requirements. Structures are ineligible for weatherization funds if they are condemned, scheduled for demolition, or designated for acquisition or clearance by a federal, state, or local program within 12 months from the date of weatherization scheduled completion. Structures will be assessed to ensure that weatherization measures will be effective. The expected lifetime of measures and their benefit will be taken into consideration when assessing structure eligibility. Conditions that constitute such limitations may include, but are not limited to:

- If remodeling or rehabilitation of the property (either planned or in progress) is substantial enough to degrade the effectiveness of weatherization.
- If the conditions of structural or mechanical systems of the home are such that it is not safe and /or possible to install or complete core measures; i.e., furnace safety and efficiency inspections and repair, blower door guided envelope air sealing, insulation.
- If it is not possible to improve the condition of the structure sufficiently to allow the installation of the core measures with the maximum allowed for incidental repair, or with coordinated rehabilitation funding.
- If, at a minimum, health and safety items cannot be addressed.

If conditions exist that preclude the weatherization of the structure, a brief written description of the conditions will be supplied to the client. This notification will be coupled with the notification that weatherization assistance is deferred until such time that the problem conditions have been resolved. The subgrantee will inform the client of a reasonable amount of time for the resolution of the problem conditions. Subgrantees will exercise caution in dealing with non-traditional type dwelling units to ensure that they meet program regulations regarding building eligibility

Describe how Rental Units/Multifamily Buildings will be addressed

In the weatherization of multi-unit buildings, DOE regulations require that 66 percent (50 percent for duplexes and fourplexes) of dwelling units in the building must be eligible households or will become eligible within 180 days as referenced in 10 CFR 440.22(b). A subgrantee shall weatherize the entire multi-family building when the building is eligible. In multifamily buildings or row house buildings where there is a complete separation between units of building thermal barrier, air pressure boundary, and mechanical systems, each unit can be considered a single-family building and would need to be deemed eligible, audited and reported as such.

A National Energy Audit Tool (NEAT) audit is required for multi-family residential buildings that contain two to four units, and all measures must be cost justified. Pre-approval from GEFA is required for any work to be performed on residential multi-family buildings with five or more units. Within the constraints of the program, a subgrantee shall provide services to buildings that have rental dwelling units occupied by eligible program participants or units that are expected to be occupied by eligible program participants within 180 days of completion of the weatherization work. A subgrantee shall weatherize the entire multi-family building when the building is eligible.

In compliance with 10 CFR 440.22, the following procedures shall be used in the weatherization of multi-family/rental dwellings:

1. Subgrantees shall use the financial assistance guidelines for dwelling units to determine eligibility.
2. Rental units should be treated the same as with owner-occupied buildings in determining appropriate measures to be performed.
3. Multi-family buildings, which include duplexes, buildings with three or four units, and buildings with five or more units are eligible to receive weatherization services in Georgia. The NEAT audit must be used on buildings that contain two to four units and all units must be audited. GEFA will secure audit and project approval from DOE before approving any subgrantee to perform work on multi-family buildings with five or more units.
4. Subgrantees shall obtain a signed authorization form from the owner/landlord of the building or a designated agent authorizing the work to be done and agreeing to the landlord's financial participation in weatherization costs. Subgrantees should develop a detailed description of the weatherization measures authorized and costs assigned to the landlord and the subgrantee. Rents shall not be raised because of the increased value of dwelling units due solely to weatherization assistance provided under this part. The agreement shall include a provision that the landlord agrees not to raise the rent for at least two



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- years from the time the work is completed, unless raising the rent is based on factors unrelated to the weatherization improvements. The client shall be provided a copy of the signed agreement.
5. In order to weatherize an entire multi-family building, the building must have at least 66 percent program eligibility rate (50 percent for duplex or fourplex) including those units that will become eligible within 180 days under a federal, state or local government program for rehabilitating the building or making similar improvements to the building. If the entire building is not eligible for weatherization because there are not enough units occupied by eligible families, service to the entire building shall be denied.
  6. The maximum amount of grant funds that can be spent for weatherization is determined by the number of units within the building occupied by eligible families/tenants, multiplied by the average cost per home. That amount may be spent on measures for the entire building. For reporting purposes, all units receiving weatherization may be reported as completed units.
  7. Approved measures (10 CFR 440, Revised Appendix A) that are applicable to multi-family units should be assessed, prioritized, and implemented in an energy savings/cost effective manner appropriate to the particular building.
  8. If a building contains one or more dwelling units and is also used for commercial purposes, only the part of the building occupied by an eligible household may be weatherized. Subgrantees may not weatherize commercial property. As described in 10 CFR 440.22, an eligible multi-family dwelling unit applies to rental units occupied by a family unit. Therefore, commercial property cannot be counted as a unit when determining the number of units in the building. Where a measure will need to be installed on both an eligible dwelling unit and a commercial area to be effective, the subgrantee shall charge the portion associated with the eligible unit to the program and charge the portion associated with the commercial area to the property owner. The amount charged to the property owner may not be counted toward the owner contribution if an owner contribution is required under 10 CFR 440.22 (d). If the property owner declines the measure or declines to pay a portion associated with the commercial area, the dwelling unit must be denied.
  9. No undue or excessive enhancements shall accrue to the value of weatherized dwelling units in Georgia. Weatherization measures to be completed on rental units, as on owner units, must be cost-effective, as determined by a NEAT audit or DOE- approved audit method. The state may recoup costs of excessive weatherization measures.
  10. The benefits of weatherization services shall accrue primarily to the low-income tenants residing in the unit.
  11. Subgrantees must receive written permission from the owner (or authorized representative) to weatherize the building. Subgrantees are required to use the WAP Authorization Form for each rental weatherization project. The form can be found on GEFA's website, [www.gefa.org](http://www.gefa.org).
  12. Subgrantees working on one to four unit rentals must follow these steps prior to performing weatherization work:
    - a. Evidence that the owner understands they must not raise rent(s) for a period of two years because of the increased value of the dwelling unit(s) when the value is increased solely because of the weatherization work.
    - b. Notify tenants that rent cannot be increased per item ten (10) above.
    - c. Tenants are notified of owner contributions in the form of rebates and rent reductions, where required.
    - d. Notify tenants in writing of the formal complaint process.
  13. For a subgrantee to work on a multi-family unit with five or more units, the preliminary investigation and permission process described below must be followed and approved by GEFA. Owner contribution in a letter of commitment is required as a part of the approval process based on the following parameters. If the owners are responsible for paying heating costs, or multi-family units are master-metered, owners may be required to make a contribution amounting up to 15 percent of the total cost of the weatherization work. If the tenant is responsible for paying heating costs, the owners are required to make a contribution amounting to 10 percent of the total cost of the weatherization work. In addition, if heating/cooling system replacements are involved, the owner must contribute 25 percent of the replacement cost of the heating/cooling system. The total commitment amount, expressed as a percentage of the total expected cost of the work to be performed, must be included in the letter of commitment.
  14. The owner may meet the owner contribution requirement in any of the following ways:
    - a. Cash contribution.
    - b. Rebate or rent reduction (the rebate period cannot exceed two years).
    - c. Donation of weatherization materials.
  15. An exception is made for owners who are themselves eligible for weatherization services because through the Georgia WAP. These owners are not required to make contributions.

Multi-family buildings with five or more units preliminary investigation and permission process.

A subgrantee must secure from the property owner(s) the information needed to complete the multi-family preliminary application. Subgrantees must use the authorization form provided by GEFA and all required information must be completed. Subgrantees are advised to follow these steps when submitting paperwork to GEFA for approval:

1. Tenant Issues:

- Cover letter that includes how tenants will be notified of the WAP and health and safety requirements (i.e., lead and mold information, and health and safety issues) as required.
- Evidence that the owner understands the cost of the contribution they are required to make and the methods allowed to meet the contribution per item 14 above.
- Affected households eligible for weatherization are notified that rent cannot be increased for a period of two years per item four above.
- Tenants are informed of owner contributions in the form of rebates and rent reductions, where required.
- Tenants are notified in writing of the formal complaint process.

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2. Property Documents:

- Preliminary application.
- Detailed scope of work highlighting the proposed weatherization measures and any energy problem areas.
- Matching funds description if owner is using other programs for other repair and/or renovations (i.e., low-income housing tax credits, etc.).
- Letter of commitment from owner outlining their contribution.
- Project schedule.
- Net energy savings/benefit potential.

GEFA will review the above documents for accuracy and provide preliminary approval/disapproval. Upon preliminary approval for the preliminary phase, the subgrantee may move forward with the final application and landlord agreement.

Final application.

Subgrantee submits all supplement/final applications and landlord agreement to GEFA along with a final project budget and scope. Upon review, GEFA will submit the entire package to DOE for approval. Upon DOE approval, GEFA will issue an approval/disapproval letter. Work cannot start on a multi-family project with five or more units unless a subgrantee has received the final approval letter from GEFA.

Multi-family/rental weatherization complaint procedures are to be followed in the following order:

1. Tenant or property owner to contact subgrantee to file complaint.
2. Subgrantee instructs tenant or property owner to complete formal written complaint.
3. Subgrantee contacts tenant or property owner to notify the other party of the complaint.
4. Tenant or property owner must submit written rebuttal.
5. Subgrantee determines if the complaint is legitimate.
6. If the complaint is legitimate (violating agreement), subgrantee writes a letter to the property owner or tenant giving them a 30-day notification to remedy the problem and submit documented proof or face penalties and/or action.
7. If not remedied locally, escalate to GEFA WAP with all written documentation. The written request for investigation should be sent to: Weatherization Assistance Program, Energy Resources Division, 47 Trinity Ave SW Atlanta, GA 30334
8. GEFA writes a letter to property owner or tenant with a 30-day remedy period. GEFA to copies all other funding agencies involved in the property.
9. If no remedy, refer to Georgia Department of Law.

Describe the deferral Process

The Georgia WAP may elect to defer a home from receiving weatherization services where health and safety hazards exist for subgrantee staff, contractors, clients or where conditions prevent the safe and effective implementation of weatherization measures. Please see the Georgia Health and Safety plan for a full list of deferral and referral conditions.

It is the client's responsibility to correct the deferral condition(s) in order for weatherization services to proceed. When the conditions causing the deferral have been addressed, clients are asked to contact the weatherization subgrantee to reevaluate the home. When possible, weatherization subgrantees are encouraged to make referrals or collaborate with programs including utility sponsored weatherization, Healthy Homes programs, home repair programs and other local resources in order to best serve the client.

Deferrals procedures during audit.

If, during an audit, the auditor arrives at a home, and determines it should be deferred prior to concluding the audit, the auditor shall immediately contact the subgrantee weatherization director to describe the situation and ask for guidance. If, in the auditor's judgment during the audit, they feel the house should be deferred for a problem likely and/or easily fixed and that the home will eventually be weatherized, the audit may continue, however, the auditor shall immediately contact the subgrantee weatherization director to describe the situation and ask for guidance. If possible, the weatherization director (or assignee) may want to meet the auditor in the field to discuss the situation further and review program guidance for ways to allow the audit to continue and avoid deferral. No home may be deferred without approval from the subgrantee weatherization director. If possible, all areas of the home should be inspected to identify all deferral issues in order to avoid multiple deferrals. Photos of all deferral conditions must be taken and included in the client file.

If the home must be deferred, the auditor must have the client sign a deferral form that includes the reasons for deferral. If deferral occurs before the audit is completed, the unit is eligible for payment, as an audit cut short for deferral reason. If the cause of the deferral is resolved, the subgrantee shall assign the same auditor to the unit to conclude the audit. If a home is deferred after the audit is completed, payment may not be made unless and until the administrative procedures to be followed for deferred units below is concluded.

Deferral procedures at time of measure installation.

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Any crew or contractor who arrives on the site and discovers what they believe to be a cause for deferral shall immediately contact the subgrantee weatherization director to discuss the situation and determine a course of action. No work shall be done on the home.

Contractor payment.

If the unit is deferred, the contractor shall fill out a deferral form listing the reasons for deferral and obtain the client's signature before departing the home. The contractor shall then be entitled to payment for work completed prior to the deferral.

Administrative procedures to be followed for deferred units.

Once a unit has been deferred, the subgrantee shall make every effort to bring clients back into the program. The subgrantee shall:

1. Direct a letter to the client informing them the home has been deferred and asking the client to correct the deferral conditions should they wish to receive WAP services, and contact the subgrantee when work is complete. The subgrantee should give the client a minimum of 15 days or a reasonable amount of time to correct the issues. The letter should refer the client to any resources that may assist with the deferral conditions.
2. If no action is taken by the client, a second letter will be sent to the client by certified mail informing them that they must contact the subgrantee within 10 days to be eligible for weatherization.
3. If no response is received to the certified letter, the unit is removed from further consideration by the WAP.
4. With the exception of renters, if a client states that they cannot or will not make the needed repairs, a final letter shall be sent to the client informing them that they have been removed from the program and that they may not participate in the WAP in the future. Removal from the program will track with the client at the time of initial WAP visit.

All letters and documentation of efforts to contact or help the client shall be kept in the client's file by the subgrantee.

Notification and appeal.

Clients shall be informed in writing by the subgrantee when services are denied or withdrawn based on deferral guidelines above. The denial notice will include instructions for appeal of the denial and/or the steps the client must take to allow the subgrantee to proceed with weatherization service.

**V.1.3 Definition of Children**

Definition of children (below age): **18**

**V.1.4 Approach to Tribal Organizations**

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

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

The state of Georgia will recognize the applicants of the three designated Indian tribes of Georgia as equal low-income clients.

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

All 159 counties in Georgia will be served. The grantee will ensure that funds are allocated to areas based on relative need for the service. GEFA will have 14 direct contracts with community action agencies (CAA) to implement the WAP. These subgrantees will ensure that WAP services are available in all 159 of Georgia's counties. Some providers may use nonprofit partners to carry out the work of the weatherization program, but the grantee will recognize and communicate with the subgrantees.

A two-part formula is used to allocate the federal funds between subgrantees. The formula takes into consideration low-income families and geographic area (square miles). The formula uses the county as the basic building block. The data is taken from the U.S. Census. The county data is assembled to reflect the total area served by a subgrantee, expressed as V1. The total number of low-income families served by a subgrantee, expressed as V2. To maintain the priority of servicing low-income families, the variables are weighted. Each area receives a weighted value of 0.2, and a weighted value of 0.8 is assigned for the number of low-income families in a given area.

The combination of the weighted variable {i.e. (V1 x .2) + (V2 x .8)} yields a subgrantee factor. When divided by the summation of subgrantee factor, it produces a funding level requirement expressed as a percentage. The percentage is then applied to total estimated funds available, not including carryover, to determine the estimated allocation for each subgrantee. Allocation of funds to subgrantees and across budget categories will be based on the base formula and will not require additional public hearings.

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The WAP Policy and Procedures Manual describes the state's response to subgrantee noncompliance, including recoupment or reduction of funding, subgrantee probation, and subgrantee termination.

Redistribution Provision: GEFA retains the right to allow for reallocation of funds to subgrantees and across budget categories using the same formula as originally proposed or any other funding plan that meets the needs of targeted Georgia citizens. GEFA retains the right to reassign subgrantee territories to other existing subgrantees operating a WAP program to ensure continuous service coverage to all 159 counties. This can be done without holding additional public hearings. Active management and reallocation of the grant allows the grant to be fully expended during the budget period. Details about termination and corrective action plans for subgrantees are described in the monitoring section of the Master File.

Per WPN 22-2, for planning purposes GEFA has developed this plan and funding using the DOE allocations.

**V.3 Priorities**

All Georgia WAP applicants will be prioritized according to the following standard procedure. Georgia's subgrantees will use an application prioritization system resulting in priority points, to the maximum extent practical. Priority is given to program eligible persons who are elderly, disabled, children, a high residential energy user, or a resident in a household with a high-energy burden as defined by 10 CFR 440.

Hancock system will be used to score all eligible applicants. Priority points will determine client position on the waiting list by county. Subgrantee's DOE contracts contain the required unit production by county in their service territory. Once the required units have been met in that county, and if funding is available, priority service will be determined by the next highest score in the subgrantee's service territory.

The following priority categories and priority points will be used:

- Age: A total of four points if the household contains any member under age 18 years or 60 years or over. A total of zero points if the household does not contain any members in those groups.
- Disability: One point for each family member with a disability.
- High Energy Use/High Energy Burden: Household with high heating utility bills. This is calculated by taking the monthly household energy cost and dividing it by the monthly household income. This equals the percentage of energy burden.

Priority Group 1 Energy Burden 35.1 - 50%	6 points
Priority Group 2 Energy Burden 25.1 - 35%	5 points
Priority Group 3 Energy Burden 15.1 - 25%	4 points
Priority Group 4 Energy Burden 10.1 - 15%	3 points
Priority Group 5 Energy Burden 5.1 - 10%	2 points
Priority Group 6 Energy Burden 0- 5%	1 point

- Additional priority groups (when applicable).

Subgrantees may give priority to clients who fall into the following categories:

Emergency: When a genuine emergency exists, which poses an imminent threat to the life, health or property of the client, and when that emergency situation can be corrected by WAP services, and when other options to correct or alleviate the threat are unavailable or impractical.

Elderly, chronically ill, children: A priority exists when the household includes members who are elderly, chronically ill, or have children under 18.

State or federal declaration of disaster: In accordance with WPN 12-7, and in such instances that warrant a designation of an area or areas as a disaster area, clients identified in these areas may be offered general or specific services on a priority basis.

**V.4 Climatic Conditions**

The climate of Georgia is typical of a humid subtropical climate with most of the state having mild winters and hot summers. The Atlantic Ocean on the east

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coast of Georgia and the hill country in the north impact the state's climate. Also, the Chattahoochee River divides Georgia into separate climatic regions with the mountain region to the northwest being colder than the rest of Georgia, the average temperature for that region in January and July being 39 °F (4 °C) and 78 °F (26 °C) respectively. Winter in Georgia is characterized by mild temperatures and little snowfall around the state. Colder temperatures with the potential for snow and ice occur across northern and central Georgia. Many summer days in Georgia have been known to exceed 90 °F (32 °C). The state experiences widespread precipitation. Tornadoes and tropical cyclones are common.

The state's climate is tempered somewhat by occasional polar air masses in the winter. Hot and humid summers are typical, except at the highest elevations. The degree to which the weather of a certain area of Georgia is subtropical depends not just on the latitude, but also on how close the area is to the Atlantic Ocean or Gulf of Mexico and the altitude. This is especially true in the mountainous areas in the northern part of the state, which are further away from ocean waters and can be up to 4,500 feet (1,400 m) or higher above sea level. The areas near the Florida/Georgia border, extending from the entire Georgia coastline west to the Florida panhandle, experiences the most subtropical weather, similar to that of Florida: hot, humid summers with frequent afternoon thunderstorms and mild, somewhat drier winters. In spite of having moderate weather compared to many other states, Georgia has occasional extreme weather. The highest temperature ever recorded is 112 °F (44 °C), while the lowest ever recorded is -17 °F (-27 °C). Heat waves involving temperatures over 100 °F (38 °C) have been recorded in the past. The entire state, including the north Georgia mountains, receives moderate to heavy rain, which varies from 45 inches (1,100 mm) in central Georgia to approximately 75 inches (1,900 mm) around the Northeast part of the state.

Snowfall occurs most winters, which increases in frequency and average amounts per year farther north in the state. In mountainous areas of Fannin, Gilmer, Pickens, and other surrounding counties, heavy snow is defined as 3 inches (7.6 cm) or more of snow in a 12 hour period or 4 inches (10 cm) or more of snow in a 24-hour period.

Georgia's autumns are normally sunny and cool in September and October, the driest months of the year, with temperatures that are near 78 °F (26 °C) during the daytime. At night, the temperature drops to near 50 °F (10 °C). It is much cooler in November with an average high of 62 °F (17 °C) and low of 36 °F (2 °C). The first freeze of the year normally occurs in November, except in the northern mountains, where it occurs in October. When conducting a computerized audit, subgrantees select the weather station closest to client's dwelling to ensure that climatic variations are considered when determining what is cost effective.

<u>City</u>	<u>Annual Heating Degree Days</u>	<u>Annual Cooling Degree Days</u>
Athens	2482	1563
Atlanta	2748	1394
Augusta	2226	1793
Columbus	2264	1594
Moultrie	1375	2387
Savannah	1398	2487

*Source: Georgia Automated Environmental Monitoring Network  
January 1, 2021 to December 28, 2021.*

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

**V.5.1 Technical Guides and Materials**

Georgia subgrantees must perform all work according to the National Renewable Energy Laboratory (NREL) Standard Work Specifications (SWS) and the State of Georgia Weatherization Field Guide to promote and support high quality work for the Georgia weatherization network. The subgrantee's signature on the WAP contract documents will serve as verification that work will be performed in accordance with NREL SWS specifications of work quality outlined in WPN 22-4, Section 2.

Georgia weatherization work will be performed in accordance with U.S. Department of Energy (DOE) - approved energy audit procedures and materials listed in 10 CFR 440 Appendix A.

Variances are created depending upon the needs of the Georgia WAP program in accordance with the Field Guide. Proposed variances are presented to the subgrantees during the monthly T&TA conference calls for review. GEFA reviews variances internally and, if approved, submits the variances request to DOE.

GEFA's process for dealing with a quality control inspector (QCI) that fails to adequately monitor and inspect the work in accordance with the recently approved Field Guide is outlined in the GA WPN 14-02 guidance uploaded to this plan.

GEFA provided a link to all subgrantees to download the Field Guide and required a sign and acknowledgement form for the subgrantees on the Field Guides,

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WAP Policy and Procedures Manual, Audit Policy and Procedures Manual and QCI forms.

Communication of guidelines and standards.

GEFA will ensure that all subgrantee contracts and subgrantee vendor contracts contain language that clearly documents the following:

- That the state is implementing work quality standards that align with the Field Guide.
- That all subgrantee staff, contractors and anyone doing the actual work have access to the Field Guide.
- That every home is inspected and complies with the Field Guide.

The subgrantee contract language has been updated to specifically include adherence to the WAP, approved audit tool, Weatherization Field Guide, WAP Policy and Procedures Manual, Energy Audit Policies and Procedures Manual, and Health and Safety Plan. The WAP Policy and Procedures Manual will include sections for quality work standards, inspection compliance and QCI qualifications, training requirements, and certifications. By signing the GEFA contract, subgrantees are acknowledging receipt of all technical manuals, policies and protocols. GEFA has loaded the Field Guides, WAP Policy and Procedures Manual, Energy Audit Policy and Procedures Manual, and Health and Safety Plan to the WAP. These resources can be found on GEFA's website [www.gefa.georgia.gov](http://www.gefa.georgia.gov).

GEFA requires a NEAT or MHEA audit on every unit. GEFA submitted all required documentation and NEAT/MHEA audits to DOE in August 2017 and July 2018. GEFA has contracted with Southface and CHP to conduct three NEAT/MHEA audit training sessions over the last several years.

Field guide types approval dates

Single-Family: 6/21/2021
Manufactured Housing: 6/21/2021
Multi-Family:

**V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: Other (specify)
Georgia Weatherization Assistance Program, National Energy Audit Tool (NEAT) submitted for Energy Audit Procedure Approval March 15 2017; revised and resubmitted on August, 2017; Final Approval received in August 2021.
Approval Date: 4/30/2019

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
Georgia Weatherization Assistance Program, Manufactured Home Energy Audit (MHEA), submitted for Energy Audit Procedure Approval April, 2012; revised and resubmitted on August 25, 2017; Final Approval received in August 2021.
Approval Date: 4/30/2019

Audit Procedure: Multi-Family
Audit Name: Other (specify)
Multi-family units will represent less than 20 percent of all units weatherized during any program year. GEFA and all its subgrantees will submit multi-family projects to DOE for approval on a case-by-case basis.
Approval Date:

Comments

<u>Energy audits and inspections.</u>
Georgia uses the Weatherization Assistant software, which includes the National Energy Audit Tool (NEAT) and Manufactured Home Energy Audit (MHEA), to assess all single family and manufactured homes. All refrigerator replacements must show documentation in the client file that the appliance was metered for at least two hours and the savings-to-investment ratio (SIR) is equal to or greater than one.

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For single family and manufactured homes, work shall be done according to the audit's recommended energy conservation measures (ECM). It is the responsibility of the subgrantee's energy auditor to assess the existing conditions of the dwelling unit/structure and record the information. An energy audit must be completed before the commencement of any work. The energy audit must include each of the following diagnostic measures:

- Blower door test for air infiltration/exfiltration
- Combustion safety testing
- ASHRAE 62.2
- Test efficiency of heating distribution system and related controls
- Moisture problems; inspect for presence of mold or mildew
- Inspect for potential lead-based paint hazards
- Determine condition and effectiveness of previous weatherization measures, if any
- Conduct indoor air quality tests where applicable
- Assess overall condition of structure, including the proper identification of the building envelope
- Evaluate client HVAC system usage/operation
- Assess adequacy of ventilation/venting systems
- Pressure pan testing/duct testing
- Conduct base load usage analysis
- Determine existence of any other health and safety issues
- Other energy related measures.

Other energy related measures.

GEFA allows subgrantees flexibility in determining work scopes, to enable a more comprehensive approach to serving low-income clients. Certain repairs may be completed in the course of providing WAP assistance. However, subgrantees are reminded that the overall goals of the WAP are to reduce energy use, and heating, and cooling costs by improving energy efficiency and ensuring health and safety. All repairs provided under the program must be incidental and consistent with the mission of the program. The following energy related repairs may be permitted, when necessary:

- Ventilation may be installed in situations where it is necessary to mitigate health and safety or moisture problems encountered in a dwelling unit being weatherized, including proper ventilation of combustion appliances.
- Heating and cooling system repair or replacement is permitted when shown to increase efficiency or useful life of the system or provide for the proper distribution of heat to occupied areas. Replacement must be based on health and safety and/or NEAT/MHEA justified (ECM) with (SIR) of one (1.0) or above.
- Chimneys may be relined or repaired when the existing chimney condition creates an unsafe or inefficient condition during the operation of the primary heating appliance. In situations where an existing chimney is inadequate for the proper venting of combustion appliances other than the primary heating appliance, alternative cost effective methods of venting those appliances should be explored and the most cost effective measure must be used.
- Hardwired lighting fixtures may be replaced to accommodate more energy-efficient lighting or when existing fixtures are unsafe.
- Ground fault circuit interrupters (GFCI) may only be installed in areas where one is required to ensure safe installation of an ECM measure.
- A roof may be repaired as an (IRM) only when this work is necessary to protect insulation that has previously been installed or is proposed as part of the work scope for the unit.
- Electrical circuits may be upgraded as an incidental repair measure (IRM) only when it is necessary in conjunction with the installation of a weatherization measure. For example, the installation of a new heating appliance, or ventilation appliance requires a circuit that is not currently present or adequate.

High-efficiency heating appliances should always be considered over standard efficiency appliances if supplemental utility funds are available to leverage installation efforts. However, if supplemental funds are not available, a standard efficiency unit may be installed. Installation of atmospheric heating appliances is not allowed.

### V.5.3 Final Inspection

General policy

The Georgia WAP, approved audit tool, Field Guide as aligned with the National Renewable Energy Laboratory's Standard Work Specification, WAP Policy and Procedures Manual, Energy Audit Policy and Procedures Manual, and Health and Safety Plan shall apply to the subgrantees and their subcontractors.

The duties of the subgrantee in sections IV through IX of this exhibit shall apply to the subgrantee's subcontractors, and subgrantees shall cause the requirements therein to be made a part of appropriate contracts, subcontracts, and agreements entered into by the subgrantee and subcontractor.

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These regulatory documents are not intended to abridge safety, health, environmental, or local codes or other ordinances. In such circumstances where there are conflicts, the local codes or ordinances shall apply.

Specifications

The contractor shall perform work in accordance with applicable program specifications defined in the Field Guide as aligned with the National Renewable Energy Laboratory's Standard Work Specifications, WAP Policy and Procedures Manual, Energy Audit Policy and Procedures Manual, and Health and Safety Plan.

Inspection and monitoring of work using guidelines and standards.

DOE requires that Quality Control Inspectors (QCI) working for the WAP possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis for QCI. This requirement applies to all individuals who perform an evaluation and approve work performed in homes including final inspectors and state monitoring staff.

GEFA will ensure that QCI competency is demonstrated by mandating certification as a Home Energy Professional (QCI). GEFA requires that each state program monitor become certified as a QCI. Each subgrantee will employ or contract with a certified Home Energy Professional QCI. Because GEFA is ultimately responsible for ensuring that every unit reported to DOE meets the work quality guidelines required by the Quality Work Plan, subgrantees must submit the credentials of all staff employed as a QCI and of any third- party organizations engaged to conduct quality control inspections. Each subgrantee will nominate the individual selected to be their QCI and register them with the state.

GEFA will implement policies and procedures to address situations when the QCI is not inspecting units using the standards adopted by the state and consistent with the Field Guide. This policy will include remedial action that may result in the denial of the unit for reimbursement until the final inspection is conducted by a QCI and additional monitoring to ensure that state protocols are consistently followed.

GEFA may require the QCI to take additional training or may deliver on-site training to the QCI to ensure all work is consistent with the Field Guide. If, after attempts at training and remediation have failed to improve the performance of the QCI, then GEFA has the authority to remove the QCI from the network that is not performing work according to the Field Guide. Additionally, the subgrantee risks the state reducing their funding allocation and using the funds to hire a third- party QCI or having funds reallocated to another subgrantee.

Quality Control Inspection.

GEFA will require that every DOE WAP unit reported as a completed unit must receive a final inspection by a certified QCI, ensuring that all work meets the minimum specifications outlined in the Field Guide in accordance with 10 CFR 440.

- Units will be inspected using criteria found in the specification outlined in the Field Guide.
- Every client file will have a QCI form that certifies that the unit had a final inspection and that all work met the required standards. The certification will be by a certified QCI. Signatures will meet the requirement. If a unit has received a final inspection and has also been monitored by the state, two certification forms will be available in the client file, one for each inspection.
- The QCI certification form will require the QCI certification status and certification number.
- The QCI will include an assessment of the original audit and confirm that the measures called for on the work order were appropriate and in accordance with the state audit procedures and protocols approved by DOE.

Georgia has elected to implement one of the DOE standard options for administering quality control inspections, Independent Auditor/QCI. The auditor performs the audit, creates the work order, and performs the final quality control inspections. The auditor is not involved in any of the actual work on the home. Each subgrantee must have a certified QCI on staff or must have a third- party certified QCI perform final inspections on each unit prior to submitting it as a completed unit to GEFA.

The GEFA program monitor is required to be certified to perform QCI and the program will perform quality assurance reviews on at least 10 percent of all completed units. To ensure the individual functioning as the QCI is able to consistently perform both tasks, GEFA will develop a quality assurance plan that requires the individual complete the QCI training at an accredited training center and be a certified QCI.

**V.6 Weatherization Analysis of Effectiveness**

1) Describe how the effectiveness of subgrantee weatherization is assessed:



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GEFA uses a tracking database to track and assess subgrantee monitoring results, which is reviewed monthly to track performance and improvements. Subgrantees are ranked 1) at-risk, 2) standard and 3) high-performing. GEFA prioritizes efforts with at-risk subgrantees to get them back to standard classification. GEFA performs monthly desk reviews on every subgrantee to review actual spend and production against planned spend and production. This allows GEFA to review the average cost per unit (ACPU) and work with subgrantees with low ACPU. The desk review allows GEFA to assess subgrantee spend and determine if reallocations within the network are required to meet the state spend goal for the WAP.

2) Describe the development of Training & Technical Assistance activities and priorities:

Training and technical assistance (T&TA) activity is primarily driven by identification of problems and issues in the field and through interviews with the crew and supervisors. Additionally, during the annual network training conference for all weatherization subgrantees, training needs are discussed and a plan developed with input for subgrantees. On-site monitoring, as described in V.8.3 Monitoring Activities, provides ideal conditions during which subgrantees may be evaluated and areas in need of improvement can be identified. If deficiencies are seen in multiple subgrantees, GEFA may require mandatory network training. For example, to better assist agencies with NEAT/MHEA audits, GEFA has held an IREC, CHP for a four-day mandatory training course for all subgrantees on NEAT/MHEA with a final test out.

3) How the grantee is incorporating monitoring feedback and training needs are being assessed:

In addition to the formal monitoring that tracks deficiencies and findings and outlines how to make improvements, monitoring visits allow for a comprehensive review of the subgrantee. On-site monitoring of at least 10 percent of completed homes includes a thorough client interview to determine outcomes, crew behavior, energy use reduction and overall impressions. Such review may include technical and financial systems and procedures, follow-up on previous training outcomes, identification of future training needs, and the sharing of best practices at all levels of operation.

4) How is GEFA tracking Subgrantee performance?

Monthly budgetary reviews enable the grantee to analyze subgrantee performance and productivity. GEFA uses a tracking sheet in to monitor spend and unit production by subgrantee and by contract. This is updated by a GEFA program manager every month. If production and/or expenditures are deemed insufficient, GEFA may recapture and redistribute funds to other subgrantees that meet or exceed production and quality work standards, without having a public hearing. GEFA offers assistance, as resources allow, to help subgrantees increase production to successful performance levels. This assistance may include special technical or administrative training of the subgrantee's staff.

5) What are the management mechanisms in place to affect improvement?

In an effort to make improvements, GEFA conducts monthly T&TA calls with its subgrantees. that include monitoring deficiency trends, training opportunities, DOE updates and production and spend data. If a subgrantee is behind or having trouble, we hope that other subgrantees might be able to offer assistance. GEFA also actively reallocates funds from subgrantees behind on spend and production to standard or high-performing subgrantees exceeding spend and production. Each subgrantee is to use the pre - and post - weatherization pictures to verify conditions at the time of final inspection for each dwelling unit. Each final inspection is to have pictures included as a representative sample of the major work that has been performed on the unit. The pictures are to be included with every client file that has had a completed final inspection. In order to calculate the most accurate energy savings, subgrantees are required, when possible, to obtain 12 months prior energy of metered energy sources for each unit to be weatherized. Each subgrantee will be asked to collect success stories that have occurred throughout the program year. GEFA is constantly exploring ways to make the program more accountable and to adopt systems that improve service delivery.

**V.7 Health and Safety**

GEFA does not allow partial weatherization on homes. Anything on a case-by-case basis must receive prior approval from GEFA to proceed. GEFA will determine if the work proposed is allowable, allocable, and reasonable and delivers on the main intent of energy conservation. In accordance with WPN 22-7, GEFA will adopt the following approach to implementing health and safety measures:

- Subgrantees shall comply with all applicable state and local building codes and regulations.
- GEFA provides its subgrantees with an allocation of funds, identified as a budget line item, to be used for required health and safety measures. Specific health and safety related measures are reported in Hancock. The purchase and maintenance of personal protective equipment and other safety equipment is allowed. Each subgrantee has a training and technical assistance budget, and those funds may be used to provide training and certifications to address health and safety issues.
- Georgia will budget 18 percent of DOE funds for health and safety measures.
- Georgia tracks health and safety labor and material costs on the subgrantees work orders and invoices.
- Reporting data that populates the statewide database to track and manage all health and safety costs.

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- GEFA encourages subgrantees to maintain coverage for pollution occurrence insurance (POI), but no longer makes it mandatory.

For further details on the applicable health and safety standards, please see the Georgia Health & Safety Plan in compliance with WPN 22-7 attached to this application.

## **V.8 Program Management**

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

The Georgia Environmental Finance Authority (GEFA), Energy Resources Division (ERD) administers the WAP. GEFA is the central coordinating unit for the energy programs within the state of Georgia. GEFA administers the following programs:

- Water and Sewer Financing
- Land Conservation Financing
- Weatherization Assistance Program
- Fuel Storage Tank Program
- State Energy Program
- Energy Performance Contracting

Hunter Hill serves as GEFA's executive director and the ERD director is Kristofor Anderson. The WAP has three full-time staff members: two program managers and one program manager/monitor. A program manager is responsible for drafting the annual WAP application, budget preparation and analysis, desk and program monitoring, spend and production tracking, contract and amendment execution, annual conference and training planning, quarterly reporting and general administration of the program. The program manager reviews requests from subgrantees that require prior written approvals or state approvals.

The program manager/monitor is responsible for program compliance as directed by 10 CFR 440 and ensuring subgrantees comply with the Georgia WAP Policy and Procedures Manual, Georgia Weatherization Field Guide, Energy Audit Policy and Procedures Manual, Health and Safety Plans, and WPNs. The program manager/monitor conducts required on-site or remote technical monitoring, provides technical assistance to resolve complaints and disputes, manages the training requirements for staff and subgrantees, and reports success stories.

The other program manager is responsible for drafting contracts and amendments, reviewing and processing all subgrantee invoices, and assisting subgrantees with inquiries and budget modifications as needed in Hancock. The program manager also tracks all subgrantee insurance and required subcontractor documentation.

All persons associated with the program use the state rules and regulations concerning travel.

The WAP will be administered by GEFA, which will be considered the grantee. The WAP is directly administered by the division director and program managers. Currently GEFA has 14 direct contracts with community action agencies to implement the WAP. These subgrantees will ensure that WAP services are available in all 159 of Georgia's counties. Additionally, an established number of units are to be completed on a county-by-county basis. Subgrantees are solely responsible for the quality of work and reporting requirements of the WAP. Subgrantees are expected to monitor the performance of contractors, crews, and nonprofit partners carrying out work for the WAP. Additionally, GEFA contractors and/or GEFA monitors will visit all Georgia subgrantees and review no less than 10 percent of completed units (see V.8.3 Monitoring Activities for additional details).

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

GEFA will follow the rules for administrative expenditure limits outlined in 10 CFR 440.18 (e), which states 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. DOE includes the provision where a Grantee may provide in its annual plan an additional 5 percent for administration for recipients of grants of less than \$350,000. The grantee must determine that such recipient requires the additional amount to implement effectively DOE's administrative requirements.

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

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Please see section V.5.3 Final Inspection under Quality Control Inspection (QCI) for the detail on the QCI policy.

Georgia has elected to implement one of the DOE standard options for the administering quality control inspections - Independent Auditor/QCI. The auditor performs the audit, creates the work order, and performs the final quality control inspections. The auditor will not be involved in any of the actual work on the home. Each subgrantee must have a certified QCI on staff or must have a third-party certified QCI perform final inspections on each unit delivered as a completed unit to GEFA. The GEFA contractor or GEFA QCI will perform quality assurance reviews on at least 10 percent of all completed units.

In accordance with 10 CFR 440 and WPN 20-4, GEFA, as the grantee of the DOE WAP, has an established monitoring system for evaluating subgrantee performance regardless of funding source. Monitoring functions will be the state's principal method for determine subgrantee compliance with the regulations contained in 10 CFR 440, applicable OMB circulars, DOE Assistance Rule 2 CFR 200, Weatherization Program Notices and any other procedures that DOE may issue. Additionally, monitoring activities will ensure the evaluation of actual accomplishments against planned activities and determining the effectiveness of WAP policy. Monitoring also provides objective reporting to and from subgrantees and makes recommendations to address program and administrative deficiencies and needs. Approximately 70 percent of the 2022-2023 grantee training and technical Assistance (T&TA) funds will be allocated for salaries and contracts associated with program management and oversight through desk, administrative, technical, and fiscal monitoring conducted by state staff and third-party contracted monitoring. Please see details below for salary percentages charged to the T&TA budget.

GEFA has developed a Quality Assurance Policy and Procedures Manual for remote monitoring that was approved by DOE on 10/01/2020. GEFA will continue to conduct remote monitoring as is practical and appropriate.

Any remaining T&TA budget will be used for on-site training, mandatory training, and trainers or passed down to subgrantees for pre-approved individual T&TA activities. Additional funding sources will be used to leverage T&TA or monitoring activities as needed. To fulfill this requirement, GEFA will conduct comprehensive monitoring of each subgrantee at least once a year using the following approach. Each subgrantee will be visited by a technical field representative to review completed units for program compliance. Each subgrantee may be visited by a fiscal/administrative representative annually and undergo remote desk monitoring by programmatic staff. Program year is defined as April 1 through March 31. The WAP staff that will participate in the monitoring process include the following:

WAP Staff	Monitoring Activity
Division Director	Monthly review and approval of subgrantee invoices, personnel management, and monitoring compliance.
Program Manager	Monthly review of subgrantee program management, fiscal procedures, contractual compliance, staffing and organization, procurement, and client services.
Program Manager	Monthly review of invoices, fiscal procedures, production benchmarks, program policy compliance, procurement, and client services.
Program Manager/Monitor	Monthly review of program management, inventory, materials quality and field work, quality assurance monitoring, in-progress unit monitoring, training and technical standards compliance.
GEFA Fiscal Support	Administrative/fiscal review that is primarily concerned with the contractual, administrative, and accounting aspects of the program.

A tentative monitoring schedule for the 2022-2027 BIL program year follows:

Monitoring reports are to be completed within 30 days of the visit to the subgrantee. These reports will summarize any findings and when necessary, direct the subgrantee to take specific actions to correct issues of noncompliance and/or to develop a plan of action to improve performance. Reports are sent to subgrantee board chairpersons, executive directors and the weatherization coordinator, who must respond within 30 days and provide evidence or assurance, as appropriate, of all actions taken. A 15-day extension is allowable with permission from GEFA.

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The steps outlined in the GEFA Monitoring Protocol will be followed regarding the reports and any possible follow-up actions. Monitoring reports include a reminder that suspension of funding is possible if a subgrantee fails to respond within the allowed time frame. Georgia's monitoring approach will include the following components:

- A monthly desk review for each subgrantee. Budget category expenditures and completion rates will be compared to planned rates (as outlined in DOE grant application request). Minimum and maximum cost averages for total dwelling, regular weatherization, and health and safety expenditures will be monitored for compliance with WAP guidelines and contract limitations. Materials, labor and program support cost averages will be monitored to ensure they are maintained at acceptable program levels. Additionally, GEFA weatherization staff will review invoices for timeliness of submission and compliance with Weatherization program policy.
- In an effort to validate compliance, GEFA staff will perform impromptu checks of subgrantee weatherization programs to ensure a continual high-performance level on the part of weatherization staff. During these visits, client files and on-site reviews will be conducted to capture the subgrantee's day-to-day activities.
- Administrative/fiscal review by from the GEFA fiscal team. This review is primarily concerned with the contractual, administrative, and accounting aspects of the program operations and does not include a field review. GEFA fiscal staff schedule the reviews independently based on GEFA accounting procedures, and while some areas will overlap, this form of monitoring is not the same as a monitoring visit based largely on field work evaluation.

The following areas will be the primary focus of the administrative/fiscal review:

- A review of subgrantee's A133 audit each year.
- Review of procurement procedures to comply with 2 CFR 200.
- The cost or purchase and delivery of weatherization materials (10 CFR 440.18(2)(1)). Funds may only be expended on weatherization materials in Appendix A of 10 CFR 440 or as approved by DOE.
- Labor costs in accordance with 10 CFR 440.19.
- Purchase or annual lease of tools, equipment and/or vehicles, except that any purchase of vehicles must be referred to DOE for prior approval in every instance (10 CFR 440.18(d) (6)).
- The costs of incidental repairs to make the installation of weatherization materials effective (10 CFR 440.18(d) (9)).
- The costs of liability insurance for weatherization projects for personal injury and property damage (10 CFR 440.18(d) (10)).
- The cost of carrying out low cost/no cost weatherization assistance (10 CFR 440.20).
- The cost of WAP financial audits in accordance with 10 CFR 440.23.
- Administrative costs (10 CFR 440.18(d) (13)).
- The costs of eliminating health hazards necessary to ensure the safe installation of weatherization materials (10 CFR 440.18(d) (15)).

Technical Monitoring: GEFA has the responsibility for on-site/remote monitoring of all WAP subgrantees. The weatherization staff's monitoring activities include:

- Monitoring 10 percent of the statewide completed units. (e.g.300 DOE units are completed, GEFA will monitor at least 30). GEFA has a planned monitoring schedule and reviews spend and production monthly to align monitoring with actual production.
- Please see the attached Monitoring Protocol document for details on eligibility, rental, field work, and client file data.
- Inspecting a sample of the dwellings completed by the subgrantee for each funding source.
- Reviewing client files of dwellings inspected.
- Reviewing program operations to ensure proper administration of allocated funds.
- Evaluating subgrantees for achieving performance standards based on criteria set forth by GEFA.
- Determining training and technical assistance needs to ensure Tier I and Tier II training requirements are met.
- Verifying training certification status and retaining training certificates.

Phase I:

- A GEFA representative will notify the subgrantee of upcoming monitoring visit and make available all the necessary forms for completion.
- The subgrantee will supply the GEFA representative a list of completed projects for the period to be monitored.
- The subgrantee will complete and return the monitoring questionnaire by a pre-determined date.

Phase II:

- GEFA will work with the subgrantee and use Hancock software to select the units to be inspected.
- The GEFA representative will select on-site files to be reviewed.

Phase III:

- On-site monitoring will attempt to focus on inspections, since desk monitoring will satisfy most administrative reviews, including financial examination. A key component of on-site monitoring will be to provide timely training and technical assistance.

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- Combustion safety monitoring will be performed on-site. Units that are completed or in-progress will be monitored. Workers, assessors, and inspectors and all combustion safety related work will be specifically reviewed for program adherence to all combustion safety related guidance, guidelines, and standards.
- Diagnostic testing is performed, including blower-door tests, combustion safety tests, and pressure differential tests. The test results are compared with those noted in the client file.
- Client interviews will be performed to assess worker behavior, workmanship and client satisfaction.
- Inspection of completed units, with the subgrantee auditor/inspector, provides an opportunity to provide on-site training and technical assistance. Various installation techniques, quality control issues or test procedures may be discussed.
- The set-up values of the NEAT/MHEA audit tool are checked to ensure they are current and accurate, that subgrantee staff is proficient in the use of the tool, and that the audit tool is used as directed by GEFA.
- Exemplary practices, successful approaches, or creative ideas in the operation of the local program will be identified and noted.
- Crew health and safety procedures will be checked for compliance with the Health and Safety Plan.
- An exit interview with the subgrantee's executive director, weatherization director/coordinator, and other appropriate staff will be held at the conclusion of the monitoring visit to present and discuss preliminary findings, observations and recommendations.
- A final written monitoring report to the subgrantee will be issued within 30 days of completed monitoring visit. The report will contain a description of the monitor's findings, observations and recommendations for corrective action. The subgrantee will submit a written response within 30 days of the receipt of the monitoring report, providing assurance that identified problems are resolved in a timely manner and documented.
- The executive director's signing and returning the monitoring report indicates the subgrantee's acceptance of the report.
- The response will be reviewed by GEFA and a letter from the weatherization program manager of acceptance or explanation will be sent.
- Should any issues be unresolved, they will be addressed in a subsequent monitoring visit.

Appeals

Should a subgrantee wish to appeal in the monitoring report, the subgrantee may submit their request in writing to the state's weatherization program manager/monitor. The appeal should be sent within 30 days of receipt of the monitoring report. GEFA will review and respond within 15 days of the receipt of the appeal. Any subgrantee that does not agree with the initial outcome of the monitoring report appeal may submit a subsequent appeal to the GEFA's executive director.

The subgrantees are also subject to visits from DOE, U.S. Department of Health and Human Services and the Georgia Department of Human Services.

GEFA's executive director may suspend or terminate a contract with a weatherization subgrantee at any time for any cause. For cause shall mean, at minimum, a finding of non-compliance with the procedures established by this section. In case of subgrantee failure to comply substantially with the provisions of the Energy Conservation in Existing Building Act of 1976 or of 10 CFR, Part 440, GEFA, may take immediate steps to suspend or terminate the contract with that subgrantee. Cause for suspension or termination of contracts shall include:

1. Failure to maintain adequate fiscal controls and accounting procedures.
2. Filing late or inaccurate financial and programmatic reports.
3. Misuse of program funds.
4. Inability of the subgrantee to account for all materials and equipment purchased.
5. Failure to adhere to the schedule for goals and objectives established.
6. Provision of weatherization services, which are not done in a quality manner.
7. Failure to use weatherization materials that meet or exceed federal specifications.
8. Failure of a subgrantee to comply with the terms of a contract.
9. Failure to comply with audit requirements.
10. Failure to comply with required procedures.
11. Discrimination of employees.
12. If a project or program is supported over two or more funding periods, suspension or termination may occur due to the failure to submit required reports still due from the prior period.

Spend and Production Goals: GEFA will require a spend and production plan be completed for each new contract to ensure the minimum units defined in each contract were delivered and that subgrantees meet the 99 percent spend goal established for the Georgia WAP network. The spend and production plan will be signed by the executive director and GEFA's program manager. Subgrantee WAP coordinators/directors must review the spend and production plans with their executive directors following the monthly invoicing and if there is a variance from the plan, they should reach out to a GEFA program manager. A subgrantee's failure to meet spend and production goals on two contracts in a 12 month period may result in reduction or termination of funding and removal from the WAP program. GEFA will review the subgrantee's productivity in relation to the established production goals and/or quality of the subgrantee's work on a monthly basis and based upon the subgrantee's specific and performance circumstances, GEFA will take these actions:

- Allow the subgrantee to continue operations at the existing funding level and thereafter conduct more frequent performance review.
- Reduce the funding level for the subgrantee and provide unexpended allocated dollars and service territory to another subgrantee.

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- Require the subgrantee to select a non-profit delegate in cooperation and with assistance from GEFA to meet production goals in a specified time frame.
- Reduce the funding to the subgrantee and provide the dollars on a competitive basis to a qualified non-profit to service the defined geographic territory.
- Provide additional funding at a level that can be expended within the grant period, to subgrantees exceeding production and/or meeting quality work standards.

Based on production levels and/or quality of work after the six month in the contract term, GEFA may also take one or more of these actions for reallocation of funds:

- Reduce the funding level for the subgrantee and provide additional funding to subgrantees meeting or exceeding production at GEFA's discretion.
- Allow subgrantee to retain existing grant dollars if the funds can be expended and production met within a specified timeframe.
- Offer grant dollars on a competitive basis to a qualified non-profit willing to serve those geographic areas where the production goal is not being met or work quality is not up to standards.

On-site/remote monitoring of a selected number of completed units will be performed by GEFA on an ongoing basis to ensure that weatherization program standards are met. In addition, GEFA may conduct satisfaction surveys to recipient households to ensure that local programs are effective and customer-friendly. Results from the surveys are published in the monitoring report. GEFA will reserve the right to reduce or add subgrantee funding and add providers to ensure that WAP dollars received by the state of Georgia are effectively expended within the time frame required by DOE.

Should any of the subgrantees that are identified in this plan cease to administer WAP during the year covered by this plan for any reason, GEFA will work with existing WAP subgrantees to provide for that service area and will not require a public hearing. If a new subgrantee is required to be added to the network to provide coverage for the service area, a public hearing will be held. According to the Weatherization Program Notice 02-1 and 10 CFR Part 440, states are reminded that Community Action Agencies are given preference.

**WAP BIL Monitoring Schedule**

The monitoring schedule is included in the WAP BIL Workbook. The intended quarter is provided for each visit (field and administrative) for Program Year 2022-2027. In the interest of spacing monitoring visits over the multiyear grant, program managers attempt to schedule monitoring visits to the network in a similar time frame each year.

While the principles and the core activities of monitoring will remain the same, WAP BIL funding will allow Georgia to modify approaches and deepen interactions in order to provide additional support to the WAP network.

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

Training and Technical Assistance Plan:

GEFA's training plan will follow DOE memorandum 034 to include comprehensive and specific training categories and will meet the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for which the worker is employed. Subgrantees are encouraged to re-certify their weatherization workers in accordance with this training plan, as needed, and at least six months prior to the expiration of the individuals' certification date to ensure an adequate supply of energy auditors and quality control inspectors (QCI), as well as all other occupational specialties requiring certification.

The major objective of training and technical assistance (T&TA) is to provide subgrantees with the information and training required to administer and operate in compliance with DOE and State rules and regulations. The majority of the subgrantees are anticipated to have at least one energy auditor and one QCI on staff, but some may contract with an independent energy auditor or QCI contractor and others may use shared energy auditor and/or QCI resources from other subgrantees.

Comprehensive Training:

Comprehensive, occupation-specific training follows a curriculum aligned with the JTA for that occupation. Tier 1 training must be administered by, or in cooperation with, a training program that is accredited by a DOE-approved accreditation organization for the JTA being taught.

Comprehensive Training Providers:

Several Tier 1 Interstate Renewable Energy Council (IREC) accredited training providers are located throughout the country and Tier 1 training is provided throughout the year, dependent upon the training providers' schedule. Subgrantees are reminded that any out-of-state training activities must be approved in advance by GEFA.

Comprehensive training courses including but not limited to:

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Home Energy Professional – crew leader, regular training every five years  
Home Energy Professional – retrofit installer, training within first six months of hire  
Home Energy Professional – energy auditor, must have certification to perform audits or be an auditor- in- training  
  
Home Energy Professional – quality control inspector, must have certification to perform inspections

Specific Training:

Single-issue, short-term, training addresses acute deficiencies in the field, such as combustion safety training, audit training, ASHRAE 62.2, etc. Conference training is included in this category.

Specific- Training Providers:

In addition to IREC accredited Tier 1 training providers, several non-IREC accredited training providers are located throughout the state/country (i.e. state, regional and/or nation meetings/conferences; technical colleges; other for/nonprofit organizations; etc). Tier 2 training courses are provided throughout the year, dependent upon the individual training providers' schedule. Subgrantees are reminded that any out- of -state training activities must be approved in advance by GEFA.

GEFA conducts mandatory periodic T&TA conference calls or webinars with subgrantees to address issues found through technical, programmatic, and fiscal monitoring. GEFA reviews new program guidance from DOE during these calls and shares information from national training conferences.

Specific training courses including but not limited to:

ASHRAE 62.2 - residential ventilation  
Blower door & duct testing  
Combustion safety testing  
CPR & standard First Aid  
Dense pack walls  
HVAC fundamentals  
Lead-Safe weatherization  
Manufactured housing - fundamentals  
NEAT/MHEA  
OSHA 10/30 - construction  
Weatherization program management

Client education

Assessment of training and technical assistance (T&TA) needs:

GEFA believes that strong internal systems, oversight, and T&TA are all essential to enable subgrantees to achieve the objectives of the weatherization program. The T&TA budget and narrative reflects this philosophy and will ensure quality weatherization work and adequate financial and programmatic management controls. The purpose of all T&TA will be to maximize energy savings, improve program and operational efficiency, improve crew/contractor work quality, reduce the potential for waste, fraud, abuse and mismanagement, and increase client satisfaction.

T&TA funding is used to pay salary, travel, and operational costs for GEFA staff and contractors to provide monitoring and T&TA to subgrantees and contractor staff. Subgrantee expenses for participation in T&TA activities will be funded from DOE T&TA and other funds. GEFA will use the following methods to provide T&TA, including but not limited to:

1. GEFA staff or contractor(s) will provide on- or off-site T&TA as needed. Needs may be identified by the subgrantee staff, DOE project officer monitoring visits, internal state audits, Inspector General reports, or by GEFA staff as a result of observation for resolution of problems, or to meet updates required by DOE.
2. On-site visits and remote monitoring provide firsthand, observable evidence for T&TA; therefore, through monitoring, GEFA staff will analyze data on a variety of financial, production, and weatherization retrofit information. Trends indicating extreme highs/lows in production or issues with weatherization measures will be noted and tracked for appropriate follow-up. Technical weatherization skills will be closely monitored and any deficiencies will be shared with subgrantees and specific training requirements will be mandated. In addition to the on-site assessment of subgrantee training needs, the GEFA program manager/monitor reviews the state list of energy auditor and QCI certifications.
3. Subgrantees will have the opportunity to identify and address their own T&TA needs through local initiatives.
4. Georgia requires energy auditor training and certification for all energy auditors.
5. Georgia requires QCI training and certification for all inspectors.
6. For current certified staff, use of continuing education credits to maintain certification will be funded through T&TA funds. GEFA allocates T&TA funds to each subgrantee for mandated training, as needed.

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7. GEFA management and subgrantee staff will attend DOE mandated activities/events, NASCSP events, state weatherization managers' meetings, national DOE conferences, and other staff development trainings as needed or required.
8. The annual Georgia weatherization training conference includes fiscal, programmatic, and technical training modules and is a mandatory T&TA activity.

Provision of training and technical assistance.

1. On-site technical assistance visits will be conducted by GEFA field and desk monitoring staff, as requested or required. Any subgrantees experiencing management, production, operational, or compliance problems will be provided technical assistance and a plan of recommended corrective action. Verbal recommendations will be given to the executive director, weatherization director, or weatherization coordinator prior to the end of the visit. A letter or a monitoring report reiterating those recommendations will be sent within 15 days of the visit and a follow-up visit will be made to evaluate progress.
2. Subgrantees will have the opportunity to select a training provider for meeting the training needs recommended and mandated by GEFA. Subgrantees must have GEFA approval for all out-of- state training and travel costs. It is strongly recommended that subgrantees use local/in-state training resources to maximize their T&TA funds.
3. Should a subgrantee hire a new weatherization director/coordinator, the subgrantee is required to notify GEFA in writing within 30 days of the date of hire and request training. GEFA will contact the subgrantee within 30 days of receipt of notification to arrange for training and develop a training plan. GEFA will use in-house staff, accredited training providers, and/or other weatherization professionals to provide training.
4. Subgrantees may use T&TA funds to support locally initiated training and to make effective use of the state training center. To assure coordination of training activities, all subgrantee T&TA funds shall be itemized and budgeted into the following categories:
  - a. Costs for travel and per diem for attendance at all GEFA -hosted T&TA workshops, seminars, meetings, or classes.
  - b. Supplemental training not offered by GEFA for subgrantee staff training must relate directly to the attendee's WAP job duties.
  - c. Purchase of training materials, including training and testing costs, necessary to meet DOE regulations.
  - d. Percentage of salary for a staff person responsible for ensuring that training, safety requirements and needs are met, and to oversee in-house weatherization training.
5. To assure coordination of training activities, all grantee T&TA funds shall be itemized and budgeted into the following categories:
  - a. Purchase of training materials, including training and testing costs, necessary to meet DOE regulations.
  - b. Travel for GEFA staff to attend conferences, meetings, training, and seminars.
  - c. Other T&TA initiatives in conjunction with local T&TA programs.
6. GEFA shall continue to assure an effective exchange of program information through:
  - a. Active involvement with the WAP Policy Advisory Council (PAC).
  - b. Promotion of statewide meetings initiated by representatives of the PAC at which management, technical and general informational topics will be discussed according to current need.
  - c. Scheduling statewide weatherization meetings to develop new training approaches and refine the existing courses to best meet the needs of the subgrantee.
  - d. Updates to program management guidance, including operations memos, information updates, and revisions in the WAP Policy and Procedures Manual, when necessary.
  - e. Encouragement of information exchange and skills transfer among subgrantees on an informal basis.

Assessment of state T&TA activities.

Effectiveness of T&TA activities will be evaluated through the following;

- Local training activities and T&TA expenditure reports
- Quarterly review of the GEFA training tracking database to measure and track training efficiency
- On-site monitoring and observations and reporting of improvement in work standards
- Review of local T&TA curriculum and activities
- Formal evaluation forms completed by participants to statewide training workshops
- Surveys to subgrantees and contractors.

Client education has been provided over the years by different methods in each area of the state, ranging from detailed discussions with clients during pre - and post -inspections to providing written educational publications. GEFA will continue to require WAP subgrantees to provide client education to each WAP client. Subgrantees will be required to provide (at a minimum) educational materials in verbal and written format.

Percent of overall trainings

Comprehensive Trainings:	90.0
Specific Trainings:	10.0

Breakdown of T&TA training budget



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Percent of budget allocated to Auditor/QCI trainings:	40.0
Percent of budget allocated to Crew/Installer trainings:	50.0
Percent of budget allocated to Management/Financial trainings:	10.0

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

Georgia's ability to leverage additional funds has allowed most providers to meet the emergency demands of their clients without significant changes to the yearly plans. In the event of a declared natural or man-made disaster, Georgia will allow subgrantees to assist their eligible clients with weatherization funds, to the extent that the services are in support of eligible weatherization work and in compliance with WPN 12-7. The allowable expenditures under the WAP are limited to include the following:

- The cost of incidental/additional repairs to an eligible dwelling unit, if such repairs are necessary to make the installation of weatherization materials effective, per 10 CFR 440.18(d) (9);
- The cost of eliminating health and safety hazards, which is necessary before the installation of weatherization materials per 10 CFR 440.18(d) (15).

In the event of a declared federal or state disaster (those in which the president or the governor of the state of Georgia has declared the event an emergency), subgrantees may return to a unit previously reported as complete to the Department of Energy that has been damaged by fire, flood, or act of God to be re-weatherized, without regard to date of previous weatherization, per 10 CFR 440.18(f) (2) (ii). Local authorities must deem the dwelling unit salvageable as well as habitable and the damage to the materials must not be covered by insurance or other form of compensation. In these cases, the work can be addressed without prior approval or any special reporting.

The subgrantee may use WAP funds to perform functions to protect the federal funding investment. Such activities may include securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local subgrantee weatherization files and records during the initial phase of the disaster response.

The use of WAP funds to pay weatherization personnel to perform relief work in the community as a result of a disaster is not allowable. The use of weatherization vehicles and/or equipment may be used to assist disaster relief activities, however, the WAP must be reimbursed according to 2 CFR 200. Re-prioritization of households located in a disaster area is permissible as long as the households are eligible for WAP, meet one of the priorities described in 10 CFR 440.16(b), and are free and clear of any insurance claim or other form of compensation resulting from the damage incurred from the disaster.