

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009990		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law	
3. Name and Address LOUISIANA HOUSING CORPORATION 2415 QUAIL DRIVE BATON ROUGE, LA 708080120	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		\$ 30,993,676.00		\$ 30,993,676.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 30,993,676.00	\$ 0.00	\$ 30,993,676.00

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	\$ 493,900.00	\$ 0.00	\$ 682,375.00	\$ 0.00	\$ 1,176,275.00
b. Fringe Benefits	\$ 216,032.00	\$ 0.00	\$ 298,471.00	\$ 0.00	\$ 514,503.00
c. Travel	\$ 0.00	\$ 0.00	\$ 52,500.00	\$ 0.00	\$ 52,500.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 3,000.00	\$ 0.00	\$ 6,000.00	\$ 0.00	\$ 9,000.00
f. Contract	\$ 0.00	\$ 2,479,494.00	\$ 403,214.00	\$ 2,000,000.00	\$ 29,241,398.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 712,932.00	\$ 2,479,494.00	\$ 1,442,560.00	\$ 2,000,000.00	\$ 30,993,676.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 712,932.00	\$ 2,479,494.00	\$ 1,442,560.00	\$ 2,000,000.00	\$ 30,993,676.00
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	\$ 30,993,676.00	\$ 0.00	\$ 30,993,676.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) VEHICLES AND EQUIPMENT	(4)	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00		\$ 1,176,275.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00		\$ 514,503.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00		\$ 52,500.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00		\$ 9,000.00
f. Contract	\$ 20,270,935.00	\$ 3,737,755.00	\$ 350,000.00		\$ 29,241,398.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
i. Total Direct Charges	\$ 20,270,935.00	\$ 3,737,755.00	\$ 350,000.00		\$ 30,993,676.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
k. Totals	\$ 20,270,935.00	\$ 3,737,755.00	\$ 350,000.00		\$ 30,993,676.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00

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(Grant Number: EE0009990, State: LA, Program Year: 2022)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
DeSoto Parish Police Jury/OCS (Mansfield)	\$1,673,695.00 138
LaSalle Community Action Assn., Inc. (Harrisonburg)	\$1,780,884.00 148
Quad Area Community Action Agency, Inc. (Hammond)	\$7,575,229.00 731
St. Mary Community Action Agency (Franklin)	\$4,424,472.00 408
TBD - Multifamily (Somewhere)	\$11,050,000.00 1,157
TBD - Single Family (Somewhere)	\$1,826,748.00 163
Terrebonne Parish Consolidated Gov./DHHS (Houma)	\$507,156.00 34
Total:	\$28,838,184.00 2,779

IV.2 WAP Production Schedule

Weatherization Plans		Units
Total Units (excluding reweatherized)		2,739
Rewaterized Units		40
Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$350,000.00
B	Total Units Weatherized	2,739
C	Total Units Reweatherized	40
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	2,779
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$125.94
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$20,270,935.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	2,779
H	Average Program Operations Costs per Unit (F divided by G)	\$7,294.33
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$125.94
J	Total Average Cost per Dwelling (H plus I)	\$7,420.27

IV.3 Energy Savings

Method used to calculate savings: ☒ WAP algorithm ☐ Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	2779	29.3	81425
Prior Year Estimate	249	29.3	7296

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Prior Year Actual	265	29.3	7764
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Method used to calculate savings description:

IV.4 DOE-Funded Leveraging Activities

LHC will not budget WAP BIL DOE funds to conduct leveraging activities.

IV.5 Policy Advisory Council Members

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

AARP Louisiana /State Office	Type of organization: Other Contact Name: Lorri Lucas, Director of Advocacy and Outreach Phone: 2253761145 Email: lleucas@aarp.org
Association for Community Action (ACAP) of Louisiana	Type of organization: Non-profit (not a financial institution) Contact Name: Lionel Wilson, Association Manager Phone: 2252879901 Email: lionel.wilson@acap-la.org
ATMOS Energy	Type of organization: Utility Contact Name: Faye Kinner Phone: 5048494335 Email: Faye.Kinner@atmosenergy.com
DEMCO	Type of organization: Utility Contact Name: Channon Martin, Community Relations Specialist&Gov't Affairs Phone: 2252623074 Email: ChanonM@DEMCO.ORG
East Baton Rouge Parish, Office of Social Services	Type of organization: Unit of Local Government Contact Name: Pam Selvage-Wilkins Phone: 2253584561 Email: PSELVAGE@brla.gov
Greater New Orleans Housing Alliance	Type of organization: Non-profit (not a financial institution) Contact Name: Nichelle Taylor, Program Director for Policy Development Phone: 50422483052002 Email: ntaylor@gnoha.org
Louisiana Public Service Commission	Type of organization: Unit of State Government Contact Name: Donnie Marks, Utilities Administrator Phone: 2253421413 Email: donnie.marks@la.gov
Quad Area Community Action Agency	Type of organization: Non-profit (not a financial institution) Contact Name: Heather Hughes, LIHEAP Coordinator Phone: 2255672350 Email: heather.quadarea@gmail.com

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
10/07/2022	The Public Hearing Notice and Proposed Plan were posted on LHC's Website, Board Room, and via email to Subgrantees and PAC on 9/27/22. ListServe issued and posted to Facebook and Twitter on 9/28/2022.

IV.7 Miscellaneous

- LHC reserves the right to redistribute funds within the grant period to actively manage the grant and move funds as necessary to fully expend the monies during the budget period and within DOE guidelines and DOE consultation.
- Due to unresolved compliance issues with Caddo Community Action Agency, a WAP-BIL service provider(s) for Caddo, Lincoln, and Rapides parishes will be selected through the appropriate competitive application process by January 1, 2023. As this is a new grant and separate from regular funding, an interim provider will not be utilized. The Request for Proposal will be submitted to DOE for review prior to release. Award will be subject to a public

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hearing.

- A WAP-BIL Multifamily (5 or more units per building) service provider for all 64 statewide parishes will be selected through the appropriate competitive application process by January 1, 2023. Louisiana will be utilizing WAP-BIL funds for this endeavor to establish a Multifamily WAP model for future grant program years. The Request for Proposal will be submitted to DOE for review prior to release. Award will be subject to a public hearing.
- Contact information for the Recipient Business Officer:

Lauren Holmes | Housing Deputy Administrator

Louisiana Housing Corporation

lhartley@lhc.la.gov | www.lhc.la.gov

Desk: 225.754.1452 | Cell: 225.252.3848

11637 Industriplex Blvd., Baton Rouge, LA 70809

twitter: [@lahousingcorp](https://twitter.com/lahousingcorp) | facebook: [LouisianaHousingCorp](https://www.facebook.com/LouisianaHousingCorp)

- Contact information for the Recipient Principal Investigator:

Mitchel Chauvin | Housing Finance Manager

Louisiana Housing Corporation

mchauvin@lhc.la.gov | www.lhc.la.gov

Desk: 225.754.1485

11637 Industriplex Blvd., Baton Rouge, LA 70809

twitter: [@lahousingcorp](https://twitter.com/lahousingcorp) | facebook: [LouisianaHousingCorp](https://www.facebook.com/LouisianaHousingCorp)

Policy Advisory Council (PAC)

Organization Name	Group Representing
AARP Louisiana	Elderly/Disabled
ATMOS Energy	Utility (gas)
Greater New Orleans Housing Alliance	Low Income Families, Elderly, Disabled, or Children
DEMCO	Utility (electric)
Quad Area Community Action Agency	Low Income Families
TBD	Utility (propane)
Association of Community Action Partnerships (ACAP) Louisiana	Low Income Families
TBD	Low Income Families
Louisiana Public Service Commission	State Regulatory
East Baton Rouge, Office of Social Services	Low Income Families

- **Davis Bacon Act Compliance**

"Section 41101" of the BIL referenced in subpart (b), is an application of the Davis-Bacon prevailing wage requirement. Accordingly, 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."

LHC is the Louisiana state administering agency for the Low-Income Housing Tax Credit (LIHTC) program. LHC also administers other housing development programs within the State. These programs have both Federal and State funding. On all qualifying housing developments, LHC will ensure compliance with Davis-Bacon Act by monitoring and reviewing certified payroll submissions. LHC will require the use of the agency's existing certified payroll system for weekly

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submission (LCP tracker). To ensure compliance, LHC will be issuing a competitive application for a WAP-BIL Multifamily service provider who will be required to invoice and report weekly certified payrolls on paid wages on all laborers and mechanics as required by their contract. LHC will review and ensure all labors and mechanics are paid wages at rates not less than those prevailing on projects of a character similar in the locality as determined by the Secretary of Labor.

- **Buy American Provisions**

The BIL made changes to domestic content preference laws, which require that certain goods purchased with federal funds be manufactured primarily in the United States. "Buy America" requirements previously applied to iron, steel, and certain manufactured goods. Title IX of HR 3684 "Build America, Buy America" broadens coverage to include nonferrous metals, such as copper used in electric wiring; plastic- and polymer-based products; glass, including optical fiber; and certain other construction materials, such as lumber and drywall.

Though requirements and applicability are still being determined by DOE, it is a near-certainty that this requirement will apply to WAP-funded work. Though this requirement is not being enforced yet, LHC is beginning to plan activities, such as ensuring any supplies of iron, steel, manufactured goods, or construction materials can certify, in writing, that their products are manufactured domestically. Louisiana will implement DOE instructions when they become available.

- **Fuel Switching**

LHC will continue to evaluate homes where fuel-switching installations may be cost-effective as outlined in current DOE guidance (WPN 19-4) utilizing any combination of funds available. Prior to administering any fuel-switching, LHC will submit a request to implement the necessary procedures and policies to their DOE Project Officer of record.

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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

Low income as per 10 CFR 440.22(a) means that income in relation to family size which: (1) is at or below 200 percent of the poverty levels, determined in accordance with criteria established by the Director of the Office of Management and Budget, or (2) is the basis on which cash assistance payments have been paid at any time during the preceding twelve months under Title IV and XVI of the Social Security Act of 1981, or (3) is the basis for eligibility for assistance under the Low Income Home Energy Assistance Program (LIHEAP), provided that such basis is at least 200 percent as established by Director of the Office of Management and Budget.

Describe what household eligibility basis will be used in the Program

The low-income population of the State of Louisiana will be targeted for weatherization services. According to the 2020 census, the estimated number of eligible dwelling units in which the elderly reside is 717,294 (15.4%). The estimated number of eligible dwelling units in which a person under age 65 with a disability(ies) reside is 521,668 (11.2%). This equals 26.6% of our 2020 population of 4,657,757.

Waiting List Priority is given to the following at-risk households:

- elderly,
- persons with disabilities,
- households with children,
- high residential energy users, and
- households with a high energy burden.

Application eligibility expires 12 months from certification date if work on dwelling unit (energy audit) has not been initiated. Subgrantees are required to re-verify eligibility and income at expiration in order to maintain a current certification date.

Categorical income eligibility is used for applicants that have met the income requirements of the U.S. Department of Health & Human Services' (HHS) Low Income Home Energy Assistance Program (LIHEAP) or the U.S. Department of Housing and Urban Development's (HUD) means-tested programs through mechanisms including, but not limited to, applicant documentation, interagency list of recipients, shared system databases, etc. This method of verification must be included in the client file. Examples of HUD means-tested programs with income qualifications at or below 80% of Area Median Income include, but are not limited to:

- Community Development Block Grants (CDBG),
- HOME Investment Partnerships Program (HOME),
- Lead Hazard Control & Healthy Homes Program (OLHCHH),
- Section 8, etc.

For HUD assisted multifamily properties, Subgrantees will determine eligibility as follows:

- Housing owned and operated by PHAs: Subgrantees shall consider all such buildings managed by the PHAs referenced on www.hud.gov to be 100 percent income eligible.
- Privately owned multifamily buildings receiving project-based assistance: Subgrantees will refer to the DOE/HUD provided list to determine the percentage of the units in each building that are income eligible.
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance: Subgrantees will determine the percentage of income eligible residences by either contacting the building owner/manager to obtain such Section 8 Housing Choice Voucher records (from HUD's Tenant Based Rental Assistance Program [TBRA]) or by individually verifying which residents hold such vouchers.

Link to Louisiana Wx Field Guides is located in section V.5.1

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

Verification of alien status will be carried out in accordance with the rules issued by the U.S. Justice Department and guidance provided by Health and Human Services (HHS) under LIHEAP. Applicants are required to provide original Social Security Cards for all household members. Agencies that are designated as local government and do not subgrant eligibility determination to a qualified non-profit organization are not exempt from this requirement and must conduct "status verification" for program applicants.

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V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Policies and procedures have been developed and published by the State to ensure assisted units are not weatherized without completion of an eligibility determination. This process is based on both the household income and the dwelling unit. Property owners must provide documentation to confirm ownership of the dwelling unit to be assisted (such as tax payment receipts, copies of deed, or certain other forms). Confirmation will also be obtained verifying that the dwelling has not received any weatherization financial assistance within the previous 15 years using WAP funds or any other Federal programs (i.e. LIHEAP, HUD, USDA, etc. "weatherization" activities). Documentation is maintained in individual client files by subgrantees and the Hancock Energy Software (HES) system.

Describe Reweathering compliance

Section 1011(h) of the Energy Act of 2020, amended 42 U.S. Code § 6865(c)(2) and created a "rolling" option for reweatherization. Policies and procedures have been developed, published by the state, and implemented by the subgrantees to ensure that no dwelling is re-weatherized if any federally-funded weatherization has been performed in the last 15 years since the dwelling unit's prior weatherization date (complete or partial). This applies to federally funded weatherization only (i.e. DOE, LIHEAP, HUD, USDA, etc.). It does not apply to any non-federal weatherization assistance (i.e. private funds, utility companies, city or parish funds, etc.). Dwelling units that have received federally funded weatherization within the previous 15 years are still eligible for other assistance (i.e bill payment) and services (client education to assist with energy management and evaluation of the effectiveness of installed weatherization materials).

In the event of a declared Federal or State disaster, weatherization crews may return to a unit reported as a completion that has been damaged by fire, flood or act of God to be re-weatherized, without regard to date of weatherization. Before proceeding, local authorities must have deemed the dwelling unit(s) salvageable, as well as habitable, and Subgrantees must confirm that the damage to the materials was not covered by insurance or other form of compensation.

The Louisiana Weatherization Application asks whether a home has received weatherization services in the past, when the services were received, and who performed the past services (WAP Subgrantee, LHC, HUD, USDA, city or parish government, utility company, private funds, or other). Subgrantees use the application to investigate instances of previous weatherization further which may include a pre-inspection to observe past measures. Documentation of previously weatherized units, using DOE and LIHEAP funds, is maintained in the client files and in the Hancock Energy Software (HES) system. Applicants, who have received any federally funded weatherization (partial or complete) within the previous 15 years, will be denied and ineligible until such time has passed.

Describe what structures are eligible for weatherization

Eligible housing types include owner and renter-occupied single family homes, owner and renter occupied manufactured (mobile) homes, and multi-family buildings.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental dwelling units, both single family and multi-unit buildings will be eligible for weatherization assistance if:

- The subgrantee has obtained the written permission of the owner, or his agent
- Duplexes and four-unit buildings have at least 50% of the units occupied by low-income applicants
- Other multi-unit buildings have at least 66% of the units occupied by low-income applicants
- For a reasonable period of time after completion, the household will not be subjected to rent increases (unless those increases are demonstratively related to other matters other than the weatherization work performed).

The Lessor authorizes and permits the Agency to undertake the Weatherization activities allowed by federal law and regulations, as determined necessary by a NEAT/MHEA energy audit established by DOE and the State.

In consideration of the above, and the mutual promises and obligations herein provided, the parties hereto agree as follows:

Service to be provided:

Upon written request, the Agency agrees to furnish the Lessor with an itemization of the services and materials to be provided, which shall be attached to and become part of this Agreement.

Consideration for Services

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From the date of execution of this Agreement, the Lessor further agrees not to raise the rental charge of the above unit(s) for one year from the date the Weatherization services are completed because of the increased value of any such dwelling unit(s) due to Weatherization assistance provided under this program. This does not preclude the increase of rent due to increased operating costs by the owner that can be documented. The Lessor further acknowledges that there are no current plans to sell or dispose of said rental unit(s) for a period of not less than one year from the date of this agreement.

Eviction

The Lessor agrees that the Lessee of said weatherized dwelling unit shall not be evicted or involuntarily removed from the dwelling because of the Weatherization services provided under this agreement and/or because of the upgraded value of the property.

Penalty for Violation

If the Consideration of Services and Eviction sections of this agreement are violated, the Lessor will be billed for the cost of the Weatherization services on a prorated basis for each month the unit was inhabited by the tenant. The Lessor further agrees to pay the cost of such services, within thirty (30) days of the date of such billing.

Liability

The Agency shall not be held responsible or liable in any way for the failure to provide work, labor services or materials provided for by the terms of the Agreement due to federal, state or municipal action or regulation. Under this Agreement, the Lessor shall not be liable for injuries and damages occurring during the completion of the Weatherization activities, which do not arise as a result of the Lessor's actions, or activities on the premises.

Release of Information

The Lessee/Applicant (or a person in the household) who is responsible for the payment of all costs associated with the utilities at the above address authorizes the utility vendor(s) to make the billing records available to the Agency or its designee, prior to and subsequent to the installation of weatherization measures, for the purpose of evaluating the effectiveness of the energy savings measures of the weatherization assistance services.

The Lessee/applicant further grants permission for photographs and non-confidential information concerning the above unit to be used to document and/or publicize the Weatherization Assistance Program.

This agreement becomes effective on the date that the weatherization assistance work has passed a satisfactory post inspection by the Agency's QCI inspector, and is acceptable and signed by the Lessee/Applicant. It expires one year following the date of acceptance and approval of the work performed.

Subgrantees must submit multi-family projects to LHC for review and approval before work begins and costs are incurred. The State will review and submit the proposed project to the U.S. DOE Project Officer for final approval.

Describe the deferral Process

Certain housing problems may cause health and safety hazards and/or present a lack of cost effectiveness to implement weatherization measures. These problems may necessitate a deferral of weatherization services to a home. In these cases, the subgrantee must notify the applicant and assist with seeking alternative resources to correct the problems. Documentation of this referral and assistance must be contained in the customer file.

After referral and customer assistance, weatherization work may be denied or deferred to a future time when these major problems are corrected. Weatherization must not proceed without the mitigation of problems that might damage either LaWAP weatherization measures or harm the health and safety of the customer and/or workers.

When a Subgrantee decides to defer weatherization assistance, it is the obligation of the Subgrantee to provide the Louisiana Weatherization Deferral Notice and Louisiana WAP Hazard Identification Notification (if applicable) to the owner or authorized agent in a timely manner. A copy of the notice must be included in the client file for review during routine monitoring visits. The written notice must include the following items:

- Client's name and address
- Dates of audit/assessment and when the client was informed
- Clear description of the problems/concerns (photos are strongly encouraged)
- Any corrective action required prior to the resumption of weatherization work with a related time frame to correct the situation.
- Documentation of client education performed
- The responsibility of all parties involved

If a Subgrantee, as part of their Standard Operating Procedures, develops a more inclusive and detailed local policy related to the above stated deferral guidance, then that policy must be submitted to LHC for written approval and reviewed on an annual basis.

If the applicant is denied WAP services, the Subgrantee should collaborate with LHC to obtain statewide and local repair funds, if available. Funding possibilities may include the following federal, state, and local funding sources:

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- HUD Emergency Repair Funds
- HUD Healthy Homes Initiative Funds
- USDA Rural Development Funds
- State, city, and parish funds
- Church, charity, and foundation funds
- HOME Rehab funds

If an eligible customer moves during the course of the LaWAP weatherization work, the Subgrantee should complete the repair and/or conservation work in progress and any other measures necessary to secure the well-being of future occupants, the structure, and the installed conservation materials. However, additional conservation or repair work should not be started.

Any and all applicants who are denied weatherization assistance will be given an opportunity to have a fair administrative review and/or hearing regarding the denial of services pertaining to the above stated deferral guidance. Any appeals may be directed to LHC.

Deferrals are tracked via the Hancock Energy Software. Beginning in PY2022, Subgrantees will be required to begin tracking all deferrals using the DOE Deferrals Classification Guide and Tracker Template. Subgrantees will be required to submit the document on a monthly basis with their reimbursement invoice to LHC.

The following sections provide specific examples of scenarios where weatherization services may be denied/deferred:

Deferral Based on Health & Safety Standards

All weatherization technicians must be able to perform all authorized weatherization activities and measures without undue threats or concerns regarding their health and safety.

Conditions which may constitute undue threats or concerns to staff or client health and safety may include but are not limited to the following items:

- Structurally unsound dwellings that are condemned for human habitation.
- Evidence of substantial, persistent infestation of rodents, insects, and other vermin which cannot be reasonably removed or poses health and safety concerns for workers.
- Electrical or plumbing hazards that cannot be resolved prior to or as a part of the authorized weatherization work.
- The presence of sewage in any part of the dwelling unit.
- Evidence of environmental hazards such as serious moisture problems, carbon monoxide, gas leaks, friable asbestos, lead, or other hazardous materials, which cannot be resolved prior to the weatherization work. If visible mold growth is greater than 10 sq. ft., deferral is required.
- The presence of animal or human feces in any area of the dwelling unit where field staff must perform various weatherization measures.
- Excessive garbage and clutter build-up in and around the dwelling unit where field staff must perform weatherization measures.
- Maintenance and housekeeping practices that are negligent to the point of limiting access of field staff to the dwelling or creating an unhealthy working environment.
- Any overt threat of violence, verbal abuse, physical abuse, or profanity towards any weatherization staff member or any household member during the weatherization process.
- Evidence of the presence and/or use of any illegal/controlled substance in the dwelling unit.
- Evidence of drug cultivation, distribution and/or manufacturing on the premises.
- The lack of the presence of a home resident who is at least 18 years old when any weatherization staff is performing the weatherization process.
- The dwelling is a mobile home that has serious structural problems, which would make the completion of weatherization measures impossible or impractical for the weatherization field staff.
- A heating system in use has been determined to be unsafe or nonfunctional (through the determination of a qualified Subgrantee or technician) and cannot be resolved through the normal efforts of the weatherization.
- When an unvented space heater is present in the unit and is used as the primary heat source, no weatherization work will be allowed unless the weatherization crew or subcontractor is allowed to remove and dispose of the unit. If an unvented space heater is replaced with a vented heating system during the weatherization process, the unvented heater will be removed and disposed prior to the installation of the new system. The owner cannot retain ownership of the heater.
- Refusal of implementation of ASHRAE 62.2 2016.
- When the extent and condition of lead-based paint in the house would potentially create further health and safety hazards or if the Subgrantee is not prepared to work with lead-based paint at the time by having proper training or liability insurance.

Deferral Based on Lack of Cost-Effectiveness

Weatherization work should be performed in a cost effective manner whenever possible. Situations or conditions which may limit the cost effectiveness of any weatherization work may include, but are not limited to the following:

- Structurally unsound dwelling unit where the costs associated with the repairs substantially exceeds the cost of the weatherization measures.
- Major remodeling is currently in progress (and is not coordinated with a housing rehabilitation program), which would severely limit the proper completion of weatherization measures on the dwelling unit.

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- A client or owner/authorized agent (landlord/property manager) refuses to allow a cost effective measure to be performed on the dwelling unit or to make necessary modifications to the dwelling unit to permit weatherization measures to be completed.
- A client or owner/authorized agent (landlord/property manager) demands weatherization materials and measures that are not deemed cost effective and/or are not allowable measures through the LaWAP.
- The dwelling unit is vacant or is uninhabitable (as described in the federal guidelines for weatherization).
- Obvious discrepancies have been found between the information supplied by the client on the WAP application and observed conditions at the time the weatherization field work commences.
- Presence of lead-based paint which would cause the project to not be cost effective (greater than \$500).

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.

In accordance with 10 CFR §440.16(f), low-income members of an Indian tribe will receive benefits equivalent to the assistance provided to other low-income persons within the state.

V.2 Selection of Areas to Be Served

All sixty-four (64) parishes in Louisiana are served by 7 subgrantees of the LaWAP program. Subgrantees have been selected or will be selected through a competitive application process. Subgrantees are responsible for the administration and implementation of the Weatherization Assistance Program, which serves eligible persons in their designated parishes. The funds are allocated to each subgrantee using a parish allocation formula based upon census data and the number of parishes served.

V.3 Priorities

The Louisiana Housing Corporation (LHC) will ensure subgrantees give priority for weatherization assistance to units occupied by the elderly, persons with disabilities, families with children, high residential energy users, and households with high-energy burden.

Applications are drawn from the waiting list based on priority ranking points first and then followed by the order of the oldest application certification date. Application eligibility expires 12 months from certification date if work on dwelling unit (energy audit) has not been initiated. Subgrantees are required to re-verify eligibility and income at expiration in order to maintain a current certification date.

Subgrantees are made aware that service to board members, employees, and relatives of employees may appear as a conflict of interest. Subgrantees are required to have written policies outlining how these applications are processed for weatherization services.

LHC and Subgrantees will be expanding outreach in support of the Justice40 effort to deliver at least 40 percent of the overall benefits from Federal investments in climate and clean energy to disadvantaged communities. Outreach initiatives will pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.

V.4 Climatic Conditions

Climatic conditions are largely consistent through the State. The average heating degree days have been supplied by the National Oceanic and Atmospheric Administration. Climate severity is measured in degree days, which are an indicator of how much fuel will be necessary on any given day to maintain comfort conditions in a home. The temperatures in the northern part of the State are slightly colder; however, the difference is not significant enough to warrant alteration of the allocation formula. Site-specific weather data is also used in the application of the NEAT/MHEA audit.

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Total heating-degree days in Louisiana range from a high of 1,538 in northwestern Louisiana to a low of 1,169 in southern Louisiana. Total cooling-degree days in Louisiana range from a low of 2,217 in southern Louisiana to a high of 2,372 in northwestern Louisiana. The cooling and heating-degree days have been supplied by the Louisiana State University Center for Energy Studies.

Baton Rouge - South

Shreveport - Northwest

Month	HHD	CDD	Avg Monthly Temp.
Jan-21	382	12	52.45
Feb-21	446	29	49.30
Mar-21			Not available
Apr-21			Not available
May-21	0	275	73.87
Jun-21	0	462	80.60
Jul-21	0	517	81.95
Aug-21	0	472	81.02
Sep-21	0	347	76.67
Oct-21			Not available
Nov-21	206	7	57.81
Dec-21	<u>135</u>	<u>96</u>	<u>63.42</u>
	1169	2217	68.57

Month	HHD	CDD	Avg Monthly Temp.
Jan-21	497	0	48.13
Feb-21	597	1	42.63
Mar-21			Not available
Apr-21			Not available
May-21	4	218	71.92
Jun-21	0	492	81.74
Jul-21	0	541	83.43
Aug-21	0	606	84.92
Sep-21	0	408	78.83
Oct-21			Not available
Nov-21	265	14	56.07
Dec-21	<u>175</u>	<u>92</u>	<u>61.98</u>
	1538	2372	67.74

Site-specific NEAT/MHEA energy audits will be completed for all single-family homes for heating system or air conditioner replacements. Red-tagged, inoperable, or nonexistent heating systems replacement or repair is allowed under Health and Safety where climate conditions warrant. Air conditioning system replacement, repair, or installation is allowed as a Health and Safety issue in the home of at-risk occupants (elderly, disabled or children) and where climate conditions warrant. Site-specific weather data is used in the application of the NEAT/MHEA audit. Domestic water heaters will be replaced on a case-by case-basis for health and safety.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

The State is committed to providing quality services and ensuring that work performed on each client's home meets the eligibility requirements of the weatherization program. The Louisiana Weatherization Field Guide was created and has been in use by the WAP providers in the field. This tool is aligned with DOE's Standard Work Specifications (SWS) and is being effectively used as the Louisiana Field Guide and Field Standards for both site built and manufactured housing types. The guides provide a tangible reference, demonstrating specific measures along with an illustration on installation and desired measure outcomes.

An electronic copy of the Louisiana Weatherization Field Guide can be found at:

<https://www.lhc.la.gov/hubfs/WEATHERIZATION/LA%20SWS%20Field%20Guide%20Final%207%202%2021.pdf>

The guides are available on the State's website or by request from LHC Weatherization staff.

All work will be performed in accordance to the DOE-approved NEAT/MHEA energy audit procedures and 10 CFR 440, Appendix A. LHC has received DOE approval to include materials outside of the approved 10 CFR 440, Appendix A, to include Energy Star certified refrigerators, Energy Star certified LED light bulbs, showerheads with a flow rate of 2.5 gallons per minute (gpm) or less, and faucet aerators with a flow rate of 1.0 gpm or less. LHC has also received DOE approval to use updated maximum life expectancies for certain Weatherization Measures within NEAT and MHEA per Attachment 9 of WPN 19-4.

Signed documentation will be obtained and maintained on file from all Weatherization Subgrantees, vendors, and direct hire contractors acknowledging expectations for SWS compliance and work quality. All subgrantee agreements and vendor contracts will contain language that clearly documents the SWS specifications for work quality, as outlined in Weatherization Program Notice 22-4 dated December 13, 2021, Section 2. The contracts will state:

Section 2.3.D

Standard Work Specifications. The Department of Energy has instituted a Quality Work Plan (QWP) to establish benchmarks for energy efficiency retrofits

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in the Weatherization Assistance Program. The QWP defines specifications for work quality, workforce training and the qualifications required for individuals performing inspections of WAP work. All tasks performed on weatherized homes must meet the specifications, objectives and desired outcomes outlined in the approved Louisiana Weatherization Field Guides, Standard Work Specifications for Home Energy Upgrades (SWS) for Single Family, Multifamily and/or Manufactured Homes, as prescribed in the Weatherization Program Notice 22-4, dated December 13, 2021, and the Louisiana Weatherization Health and Safety Plan, as prescribed in the Weatherization Program Notice 22-7, dated December 15, 2021.

Every DOE/WAP unit reported as a "completed unit" must receive a final Quality Control Inspection ensuring all work meets the minimum specifications outlined in the SWS, approved Louisiana Weatherization Field Guides, and all components of the Louisiana State Plan. All sub-contractors' agreements must include the same technical requirements and the work performed must be consistent with procedures established in LHC's standards and approved Louisiana Weatherization Field Guides.

All quality control inspections must be conducted by an independent Building Performance Institute (BPI) Certified Quality Control Inspector, as prescribed in the Weatherization Program Notice 22-4 and Louisiana State Plan.

LHC will accept the signature on all contracts/agreements as the mechanism used to confirm the subgrantees understand and agree to the expectations of the DOE standard work specifications requirements.

LHC will ensure that all Weatherization activities not included in the list of Categorical Exclusion activities in the PY2022 NEAP determination will have an Environmental Questionnaire (EQ)-1 prepared and submitted to DOE for review.

LHC will ensure that all Weatherization activities adhere to the restrictions of the Louisiana DOE executed Historic Preservation Programmatic Agreement (PA).

Every DOE/WAP unit reported as a "completed unit" must receive a final inspection ensuring all work meets the minimum specifications outlined in the SWS and all components of the Louisiana State Plan. All sub-contractors' agreements must include the same technical requirements and the work performed must be consistent with procedures established in LHC's standards and and DOE approved field guides.

All quality control inspections must be conducted by an independent BPI Certified Quality Control Inspector as prescribed in the Weatherization Program Notice 22-4 and the Louisiana State Plan.

Field guide types approval dates

Single-Family: 7/6/2021
Manufactured Housing: 7/6/2021
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: NEAT
Approval Date: 8/12/2019

Audit Procedure: Manufactured Housing
Audit Name: MHEA
Approval Date: 8/12/2019

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

Comments

LHC received conditional DOE approval of Louisiana's energy audit procedures using the Oak Ridge National Laboratory's Weatherization Assistant software for manufactured housing units, using Manufactured Home Energy Audit Version 8.9.0.5 (MHEA), and site-built, single family homes, using the National Energy Audit Tool Version 8.9.0.5 (NEAT). The first condition was the implementation of a standardized Energy Audit Checklist to verify initial field audit data collection and audit software data entry for every WAP job. This was implemented effective January 1, 2020. LHC has partially completed the second condition which is the development of an Audit and Inspection Process Manual. LHC released the Louisiana Energy Audit Procedures Manual - Weatherization Assistant Audits for Site Build Residential Structures (NEAT v.8.9) Release via Memorandum LA WAP 04 on May 25, 2021. LHC is currently making slight modifications to a second manual to accommodate differences with running a MHEA audit.

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LHC is currently awaiting for the updated version of the NEAT and MHEA audit tool (version 10) to be migrated to the web and approved for use by DOE. DOE will be provided read-only administrative access to the energy audit tool for the duration of the grant.

For Multifamily, LaWAP will ensure that all staff will have the required Multifamily training and any proposed weatherization of multi-family units will be approved by DOE before work commences. LHC is planning on utilizing WAP-BIL funds for Multifamily on 41% of the completed units. Louisiana plans to utilize the optional DOE-Sponsored Priority List for Low-Rise Multifamily Projects in Region 1 (HOT) (WPN 22-8 effective July 1, 2022) to complete these units. LHC is planning a competitive application process Fall 2022 for a WAP-BIL Multifamily service provider. Upon award of the new service provider, a formal written request for approval of the Priority List will be submitted to DOE for review.

V.5.3 Final Inspection

Subgrantees are required to perform an independent quality control inspection (QCI) at the conclusion of each Weatherization project. This inspection must include an evaluation of the use of the Energy Audit Tool as well as all mechanical work performed on completed dwelling units. This must occur, and be documented, before reporting the project to the State as a "completed unit". This process is to ensure that all work performed meets or exceeds the minimum specifications outlined in the SWS and LA Field Guide in accordance with 10 CFR 440.21. All supporting documentation including inspection and monitoring certifications will be maintained in the client's file and all necessary data will be entered in the Hancock Energy Software (HES) system.

LHC will continue to offer testing within LHC's Technical and Training Assistance contract and provide inspectors with an ongoing opportunity for QCI certifications throughout the life of the grant.

LHC's QCI certified staff will monitor at least 5% of the completed WAP-BIL units and accompanying client files for each subgrantee if the unit's final inspection was performed by an individual that had no involvement in the work performed on the unit. However, if it is determined that the subgrantee under review did not use an independent QCI inspector, LHC will increase the percentage from at least 5% to 10% of all completed units.

Per the LA Weatherization Programmatic Guide, "All weatherization completions must undergo a BPI QCI final inspection, which is documented in the unit file and is subject to the following requirements:

- The Subgrantee must use trained and certified BPI QCI auditors to perform final inspections. The final inspector must ensure that all measures required by the energy audit (NEAT/MHEA) **Recommended Measures Report** and **Work Order** have been installed and that the work quality meets expectations set in DOE's SWS and Louisiana's Weatherization Field Guides. LHC, as part of their regular monitoring procedure, will review final QCI inspection forms, energy audit data collections and review checklists, Subgrantee inspection processes, and completed homes to ensure the inspections are being performed correctly and in a manner that is consistent with DOE expectations as outlined in Quality Work Plan Requirements WPN 22-4. Failure by the Subgrantee to utilize the QCI process correctly may result in all associated costs being disallowed and returned to LHC.
- No dwelling unit may be reported as a completed unit until all weatherization materials have been installed, and the Subgrantee has a final inspection performed by a certified QCI inspector. This final inspection includes work performed by Subcontractors. The inspector must verify that the work has been completed in a workmanlike manner and in accordance with the DOE's SWS and Louisiana Weatherization Field Guides.

Consistent or repeated violations of LaWAP standards may require LHC to impose disciplinary action upon an agency. The disciplinary action will vary and depend on the severity of the deficiency or deficiencies identified. Immediate termination is possible depending on the finding. The typical disciplinary process in order of least to most severe includes:

- Placement on a Watch List
- Probationary Status (may include suspension of program)
- Termination of Weatherization Contract

V.6 Weatherization Analysis of Effectiveness

In accordance with 10CFR 440.14(c)(6)(i), LHC has established policies of evaluating subgrantees' performance during field monitoring, desktop monitoring, peer-to peer training, Hancock Energy Software (HES) data monitoring and annual training assessments.

Evaluations will be based on financial and programmatic reports submitted by the subgrantee. Monitoring site visits will include, but are not limited to, assessment of program files and reports, work quality, production and expenditure reports, and hands-on training conducted by the Program Specialists.

As a part of the monitoring process, LHC will institute a "risk analysis." As a result of the risk analysis, an agency may be placed on a "Watch List" and given an opportunity to improve its performance. Any agency given this designation will necessitate the need for increased monitoring. A work plan with relative timelines will be developed in an effort to improve documented performance weaknesses of subgrantees placed on the watch list. When a subgrantee's performance fails

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to improve in a reasonable time period, it elevates to probationary status level for no more than one program year. At this point, LHC may implement procedures to impose sanctions such as: reduce funding or terminate the contract.

The HES system will continue to be utilized to capture program data to formulate analysis for monthly management reviews and board meetings. LHC will continue to look at upgrades and improvements needed with the weatherization component of the HES software.

V.7 Health and Safety

The Health and Safety Plan is a separate attachment to the Grant Application. Louisiana WAP-BIL Health & Safety costs are based on the PY2021 Health & Safety average costs of \$1345/per unit. (18% of Program Operations).

V.8 Program Management

V.8.1 Overview and Organization

State Administration

The major goal of the Louisiana Weatherization Program is to enable low-income individuals and families, particularly the elderly, persons with disabilities, and households with children the opportunity to participate in an energy conservation program. This will positively impact the program's participants by lessening the impact of the high cost of energy on their household budgets, improving household health and safety, and reducing their dependence on the Low-Income Home Energy Assistance Program (LIHEAP). The program also helps to reduce energy consumption, as part of a national goal of energy independence, by increasing the thermal efficiency of homes, reducing the greenhouse gas CO₂ and providing employment opportunities in both the public and private sectors. The program also continues to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.

The Executive Director of the LHC has empowered the Program Administrator to be primarily responsible for all energy programs, which include both WAP and LIHEAP. The Program Administrator shall fully utilize all assigned energy staffing to ensure the most efficient and effective program administration. Current and new personnel will administer and monitor the program, as outlined in the approved plan. All new hires will be interviewed to assess experience and will be fully trained to ensure program continuity.

Although subgrantees will have direct access to the Hancock Energy Software (HES) team at the HES headquarters through the Helpdesk module, ownership of the HES system resides at LHC. LHC Energy personnel, along with the Corporation's IT team, will ensure the system's integrity and functionality.

The Energy Assistance Manager is responsible for ensuring compliance with federal program requirements, development of policy initiatives and general program administration. The manager reports directly to the Program Administrator.

Ongoing program monitoring of local subgrantees, invoice review, tracking of funding allocations, and investigation of client complaints is conducted by the Fiscal/Administrative Monitor(s). The Fiscal/Administrative Monitor(s) will visit subgrantees at least bi-annually to monitor fiscal compliance and provide technical assistance in the areas of accounting, auditing, weatherization processes and related program activities.

The Technical Coordinator/Monitor(s) will visit subgrantees at least bi-annually to monitor technical compliance with DOE and LAWAP SWS and provide technical assistance in the areas of the Energy Audit Tool, DOE and Louisiana SWS, Health and Safety, ASHRAE 62.2-2016, Louisiana policy and procedures, and related program activities.

The Technical/Field Administrator is responsible for performing quality control inspections of the technical monitoring performed by the Grantee and will assure continued coordination of LHC policies is provided to the subgrantees such as QCI, EA, NEAT/MHEA and ASHRAE 62.2-2016 as deemed necessary.

The Training Coordinator assures continued coordination of LHC policies is provided to the subgrantees such as QCI, EA, NEAT/MHEA and ASHRAE 62.2-2016 as deemed necessary. Conducts occasional on-site monitoring to ensure subgrantee implementation of training and to assess training needs pertaining to the WAP program. This includes verifying QCI inspections, quality of the Weatherization work and accessing the energy efficiency of the unit.

Fiscal monitoring, payment processing, and budget tracking are conducted by the LHC Accounting team.

Program decisions and administration guidelines will adhere to all federal and state regulations related to the use of current funding for the provision of weatherization services in Louisiana.

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V.8.2 Administrative Expenditure Limits

If a subgrantee receives less than \$350,000 of DOE funds for the Weatherization Assistance Programs, the subgrantee may receive an additional five percent for administrative funds as set forth in Sec. 440.18(d). This guidance provides direction for recipients of grants if the state has determined that such recipients require additional administrative funds to effectively implement the program measures. Subgrantee administration funds have been included in the budget at 8% of the total WAP-BIL award. No subgrantee is scheduled to receive less than \$350,000.

V.8.3 Monitoring Activities

The LHC utilizes a systems approach to monitoring local subgrantees for compliance with applicable regulations and achievement of performance goals for the weatherization program. The framework for the systems approach is a regulation based assessment that is criterion-referenced. The assessment includes: general organization, desk reviews, onsite visits to evaluate the subgrantees' general administration and program management systems, needs assessment, service delivery, financial management, and technical and field applications according to the DOE Standard Work Specifications, program procurement and property control system. LHC adheres to WPN 20-4 and ensures that grant funds are expended in accordance with applicable law, including regulations contained in 10 CFR 440, Federal Financial Assistance Rule 2 CFR 200, Weatherization Program Notices, and other guidance that DOE may issue.

LHC positions related to monitoring activities are as follows:

- The Fiscal/Administrative Monitor(s) position oversees the subgrantees' program operation, processes all requests for payment, monitors performance, provides technical assistance to the subgrantees, contractors and vendors, and conducts the administrative/fiscal on-site monitoring. Staff is knowledgeable with program regulations, guidance, financial management and administrative operations.
- The Program Administrator/Program Manager is responsible for performing quality control of programmatic/fiscal monitoring and reviewing monitoring reports performed by the Grantee and ensures continued coordination of Louisiana's policies.
- The Technical Coordinator/Monitor(s) is responsible for performing the technical monitoring regarding program regulations and best practices of the WAP program. Staff has/will have BPI Home Energy Professional (HEP) Quality Control Inspector (QCI) certifications with previous experience in the Weatherization Program. Staff may also provide Training and Technical Assistance as needed.
- The Training Coordinator is responsible for coordinating and/or providing the training activities required by LHC.
- The Technical/Field Administrator is responsible for performing quality control inspections of the technical monitoring performed by the Grantee and ensures continued coordination of Louisiana's policies.

Part of the salaries under the WAP program will be charged to the Grantee Administration budget and WAP T/TA categories. Travel expenses to conduct monitoring activities will be charged to the Grantee T/TA budget category.

Type of Monitoring Reviews:

Administrative/Fiscal Monitoring

LHC staff will conduct an on-site Subgrantee program compliance monitoring review bi-annually in the first half and second half of each program year. Scheduling of the visits will depend upon the subgrantee's contractual production schedule and any previous or existing risk issues. LHC will monitor the WAP-BIL funding/units separately from the WAP annual appropriations funding.

The review will involve using a comprehensive monitoring instrument to ensure that uniform monitoring procedures are applied to each subgrantee. This procedure provides for an analysis of the subgrantees' performance and implementation of the WAP under the program agreement.

The areas covered in the monitoring instrument include:

- Reporting and record keeping
- Policy and procedures
- Service delivery
- Eligibility determination
- Accounting and financial management policies and procedures, including internal control systems.
- Audits
- Invoicing
- Monitoring of contractors
- Personnel policies and procedures
- Property records and office inventory
- Procurement process
- Other program-related compliance area that are material to the Agreement.

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Technical/Field Monitoring

LHC staff will inspect at least 5% of the completed WAP-BIL units weatherized by each subgrantee, as well as, review corresponding client files under this grant bi-annually in the first half and second half of the program year. LHC will monitor the WAP-BIL funding/units separately from the WAP annual appropriations funding. LHC staff will also inspect additional "in progress" homes at each subgrantee, as needed. During the monitoring visits, LHC staff will provide technical assistance; however, additional on-site technical assistance will be provided based on need. Should LHC determine that a subgrantee under review did not use an independent QCI inspector or if other significant issues are identified, LHC will increase the monitoring percentage from at least 5% to at least 10% of all completed units.

The areas covered in the monitoring instrument include:

- General operational policy
- Employee and subcontractor policy
- Facilities, vehicles, tools and equipment
- Energy audits
- Field Work and Quality Control
- Health and Safety for client and workers
- Personnel qualifications and training
- Client education
- Final inspections
- Denial of services

Monitoring Procedures:

Each subgrantee will be notified in advance of their scheduled monitoring visit. During the visit, staff will use a comprehensive monitoring tool that will ensure a thorough review of each subgrantee. At the end of the visit, the Subgrantee will be briefed on any observations, findings and/ or general comments. If Health and Safety issues are discovered which present imminent danger to people in the household, the LHC staff will require the Subgrantee to immediately resolve the issues and provide supporting evidence of resolution.

Within 30 days after each fiscal or technical visit, LHC will provide a written report to the Subgrantee describing the current monitoring assessment, which will identify any findings, concerns, recommendations, commendations, best practices and any corrective actions, if applicable. When extensive corrective actions are required, LHC will be allowed a total of 45 days following the monitoring visit to provide the written report to the Subgrantee. The Subgrantee will be required to respond within 30 days of the date of the monitoring report regarding any corrective action it has or will be undertaking. LHC will track all correspondence, including financial reviews until final resolution. If necessary, staff will conduct a follow-up monitoring visit to ensure that the corrective action has been initiated or completed. Once LHC and the Subgrantee have mutually agreed on the outcome, LHC will send a closure letter to the Subgrantee and place a copy in the monitoring file. Should both parties not reach a mutual agreement, then LHC will make assessments that may include termination of the contract.

Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

Repeated unresolved findings, based on a minimum of two (2) monitoring visits at a Subgrantee, will be reported immediately to the DOE Project Officer.

The Louisiana Weatherization Field Guides, DOE Standard Work Specifications and NEAT & MHEA will be used to evaluate the effectiveness, safety, workmanship, overall appearance, and compliance with the LaWAP Standards of individual weatherization jobs.

The LHC staff will:

- * Recommend reworks, re-inspections, and T&TA visits in response to major findings and will investigate legitimate customer complaints, which may result in the agency being required to return to correct errors or omissions.
- * Note concerns about agency operations on the inspection report.
- * Disallow costs and/or designate the agency as high-risk and place the agency on a Watch List in response to recurring major findings or persistent noncompliance with LaWAP policy.

Goals:

- * Provide comprehensive verification that Subgrantees are delivering high quality Weatherization services.
- * Verify compliance with applicable policies and regulations.
- * Promote efficiency and effectiveness in Weatherization delivery.
- * Identify areas where there are deficiencies and training and technical assistance is warranted.
- * Perform technical monitoring annually as required and depending on concerns/issues found during monitoring, additional on-site visits may be conducted.

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T&TA Visits:

T&TA visits are not official monitoring visits and do not result in the reporting of findings. LHC will visit agencies for T&TA purposes, as often as necessary. LHC will provide guidance, training, and technical assistance to agencies in response to findings.

Financial Audit Review:

The Subgrantees' annual financial audit reports are received, tracked and logged, and are continuously monitored for findings impacting weatherization. Monitoring reviews performed onsite at the subgrantees' facility ensures that annual financial audits are performed in accordance with federal regulations. LHC will investigate all findings or issues detailed in the audit report that relate to the weatherization program. If significant issues are found they will be investigated by LHC. LHC will document all actions taken until the issue is resolved. Significant findings identified in subgrantee financial audit reports related to weatherization program will be reported to the DOE.

Rating of Agencies:

LHC will rate Weatherization agencies' compliance with LaWAP policies, cited on the monitoring instrument, according to the following scale:

- *Good Compliance (GC)*: Subgrantees will receive a rating of GC when a monitoring event does NOT identify deficiencies in compliance with evaluation standards specific to a given LaWAP policy, or, when minor deficiencies are identified that are easily corrected during the monitoring event.
- *Minimal Compliance (MC)*: Subgrantees will receive a rating of MC when a monitoring event identifies deficiencies in compliance with evaluation standards specific to a given LaWAP policy for the majority (less than half) of the sample items (homes, files, etc.) reviewed.
- *Noncompliance (NC)*: Subgrantees will receive a rating of NC when a monitoring event identifies deficiencies in compliance with evaluation standards specific to a given LaWAP policy for the majority of the sample items (homes, files, etc.) reviewed, or when noncompliance with a "zero tolerance" issue is identified. Zero tolerance for the following areas of noncompliance includes, but is not limited to the following Health & Safety Issues:
 - CAZ (performance & documentation)
 - CO (performance & documentation)
 - Unvented Space Heaters
 - Incomplete NEAT & MHEA Audit
 - Gas leak(s) detected
 - Insulation blown over knob and tube wiring
 - Items invoiced for weatherization purposes that have NOT been installed on the home i.e.. insulation, Rinnai heaters, refrigerators, range vents, etc.
 - Weatherization conducted without use of blower door
 - Recurring Findings/Reworks

**The ratings are established at the conclusion of a monitoring event upon completion of the Louisiana Standards Field Monitoring Form. The ratings are recorded and reported to the agency on the LHC field monitoring section in the final written field monitoring report.*

Findings And Agency Discipline:

The discovery of a violation of a policy or procedure is called a finding. Findings will be documented during each regularly scheduled monitoring visit. The findings will be revisited and reexamined during the subsequent regularly scheduled monitoring visit to ensure corrective action has been taken.

Findings

Any noncompliance with a LaWAP policy or procedure constitutes a finding. Examples of findings may include, but are not limited to the following:

- The health and safety of customers, subgrantee staff, or subcontractors, or the integrity of the building structure is threatened by work completed with LaWAP funds
- A weatherization related health or safety problem is created by, exacerbated by, or not corrected by the delivery of LaWAP services
- The omission, without appropriate authorization, of a required cost effective measure, a necessary repair, or a required health and safety repair
- Poor quality work that degrades the performance of weatherization measures or repairs
- Measures not installed according to DOE Standard Work Specification and LA Field Guide

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- Major expenditure of funds on measures/materials that are not included on the appropriate energy audit or are not required in the LaWAP Field Guide
- Costs charged to a unit with no documentation or receipts to validate
- Any action or lack of action that may result in a liability that threatens LaWAP
- Work site cleanup that does not meet the satisfaction of the client
- Required energy conservation measures that are not installed
- Required health and safety measures that are not addressed
- Employees are not given adequate time to attend training
- Office or warehouse contains fire or safety hazards
- Agency files are disorganized and difficult to monitor

Corrective Action/Rework Report

Failure to respond within 30 days from date of monitoring report will be documented and may become a finding on future monitoring reports. Once LHC receives the corrective action/rework report, including all support documentation (photos, written responses, receipts, client acknowledgement forms, etc.), LHC will issue a closure letter if the report is deemed appropriate and corrective actions have been properly implemented and/or executed.

Agency Discipline

Consistent or repeated violations of LaWAP standards may require LHC to impose disciplinary action upon an agency. The disciplinary action imposed will vary depending on the deficiency or deficiencies identified. Therefore, an agency may bypass the Watch List and move immediately to Probation or Termination. The disciplinary actions in order of least to most severe include:

- Placement on a "Watch List"
- Probationary Status
- Termination of Weatherization Contract

**Each agency may reserve its right to appeal any disciplinary action taken.*

Appeals Of Findings

Appeals should be submitted in writing within thirty (30) calendar days of receipt of a notification. Agencies may appeal findings by the following sequential steps:

1. The agency may appeal finding(s) to LHC's Program Administrator.
2. Agencies that do not agree with the decision of LHC Program Administrator may submit an appeal to the LHC Executive Director.
3. Agencies that do not agree with the decision of the LHC Executive Director may submit an appeal to the DOE's Project Officer.

After following the sequential steps listed above, the appeals process has been exhausted.

Watch List:

As part of the monitoring process, an agency may be placed on a "Watch List". The purpose of the Watch List is to provide the agency with an opportunity to improve on its performance weaknesses. Placement on the watch list is typically associated with relatively minor deficiencies that warrant additional attention in order to prevent more serious issues from developing. The agency will receive written notice that it is being placed on the Watch List and will be given a reasonable time period to correct the issues. The length of time provided to correct the issues may vary depending upon the corrective action to be taken. Agencies placed on the watch list may also be monitored on a more frequent basis than the regularly scheduled monitoring visits. The reasons for placing an agency on a watch list may include, but are not limited to the following:

- When an agency fails to submit responses to findings and corrective actions/reworks in a timely manner as specified in LHC's monitoring reports
- When an agency has recurring findings and/or corrective actions/reworks
- When LHC determines that there are administrative issues within the agency that affect its performance of LaWAP
- When LHC finds that staff and/or contractors need additional training to improve the quality of work and/or training of new staff
- When LHC determines that the average cost per unit is excessively high or low based on the State's overall average for the program year

** If the agency has corrected the issues cited in the Watch List notification within the time period given, the agency may be removed from the Watch List and will proceed with regularly scheduled monitoring events. However, if the agency does not comply within the time period provided, the agency may be placed on probation.*

Probation:

Depending on the severity of observations, corrective actions/reworks, and findings noted during monitoring visits, LHC may exercise its option to place the agency on probation. Additionally, if the agency fails to correct its findings and corrective actions/reworks cited in the "Watch List" notification, the agency may be placed on probation. The agency will receive written notice from the LHC administrator that it is being placed on probation and will be given a reasonable time period to correct

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the issues. The notice will include the cause for probation and additional instruction to assist the agency in achieving compliance. The agency will also receive additional monitoring visits and/or onsite training from LHC, if deemed necessary. The reasons for placing an agency on probation may include, but are not limited to, the following:

- When an agency has recurring findings that are not resolved within the time period provided
- When standards rated as noncompliant are recurring
- When the agency fails to comply with the corrective action that was submitted while the agency was on the watch list
- When the agency consistently fails to reach unit production goals established by its contract
- When an agency consistently exhibits a low expenditure rate

** The agency will remain on probation until the LHC has determined that the agency is back in compliance with the policies and procedures of LaWAP. If the agency does not improve within the reasonable time period given, it may be subject to termination of the contract.*

Termination:

§13.4 Procedures for Termination

§13.4.1 Notice for Termination for Cause. The Corporation shall notify the Contractor in writing of a default of the Agreement under Section 13.1. The Corporation shall provide the Contractor with ten (10) days to cure the default. If, at the end of the cure period, the Corporation determines that the violation has not been cured, the Termination of the Agreement shall be effective immediately, without further notice.

Refer to Weatherization Assistance Program (WAP) Agreement between Louisiana Housing Corporation and Subgrantee, Article 13 - Termination of Agreement; Procedures Upon Termination or Expiration of Agreement in its entirety as the governing document.

V.8.4 Training and Technical Assistance Approach and Activities

Training and Technical Assistance (T/TA) activities are intended to maintain or increase the efficiency, quality and effectiveness of the WAP program at all levels. T/TA will be administered to ensure quality work, maximize energy savings, minimize production costs and improve program management. This component of the program is designed to make certain that installed field measures meet the LaWAP Standards for work outlined in accordance to the Standard Work Specifications (SWS) for Home Energy Upgrades and the Louisiana Wx Field Guides.

For WAP-BIL, the Louisiana Training Center and LHC have partnered with Everblue (via RFP) to provide onsite training opportunities while LHC builds internal curriculum and gains IREC accreditation: QCI, Energy Auditor, Crew Leader, and Retrofit Installer Technician. Outside trainers may be brought in via RFP for additional NEAT/MHEA and OSHA and possible RRP Lead Safe trainings. Contract Training may also include Building Analyst and IDL from Diversified Energy. LHC's goal is to continue to increase the number of BPI-certified Quality Control Inspectors working in the LA WAP and to maintain the existing knowledge, skills and abilities in the current qualified pool. This program ensures all inspectors possess the knowledge, skills and abilities outlined in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA).

LHC will track all required workforce credentials for individuals within the Grantee and Subgrantee LAWAP network. Required federal workforce credentials include EPA RRP, OSHA, and QCI. LHC will contact and ensure Subgrantees' and LHC certifications are renewed prior to expiration. LHC will track non-required certifications earned by Grantee and Subgrantee members to ensure optimal knowledge, skills, and abilities within the network exist and offer training opportunities in alignment. LHC will review local and industry requirements (i.e. Contractor licenses, Equipment Manufacture Certifications, Vendor Certifications, etc.) at each Subgrantee monitoring to ensure credentials are in compliance with associated standards.

LHC will review the production and energy savings of each Subgrantee, in addition to onsite monitoring, to determine where energy saving opportunities are being missed and whether Specific Training is needed to ensure results.

T/TA funds will be used to train subgrantees and contractors participating in the WAP program and to encourage and enhance workforce development. Per DOE guidelines, LHC will ensure that the use of T&TA funds to reimburse contractors is limited to T&TA that supports the four Home Energy Professionals occupations (Retrofit Installer Technician, Crew Leader, Energy Auditor, Quality Control Inspector). In making the determination to pay for contractors' training, LHC will ensure the Subgrantee secures a retention agreement in exchange for the training that meets DOE requirements. The retention agreement will require that contractors maintain consistent employment in the WAP program for a specific amount of time, ensuring the funds expended for training are maximized. LHC developed a timeline for regular accredited training using DOE curricula designed for both new and experienced WAP workers. The T/TA plan addresses two distinct categories, Comprehensive Training and Specific Training.

Comprehensive Training:

Comprehensive Training will be available to technical field staff on an annual to bi-annual schedule based upon available funds, existing credentials, and as determined by LHC. It will be administered by, or in cooperation with, a training program accredited by a DOE-approved accreditation organization for the specific JTA being taught. All new employees must attend and complete training of the JTA for the position in which the worker is employed within one year of hire. Neither Grantee nor Subgrantee staff may function unsupervised until training and certification requirements are met. The Weatherization Assistance Program Standardized Curricula will be used for the following:

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JTA	Frequency
Crew Leader	Every 3 years or as determined by LHC on a case-by-case basis.
Retrofit Installer/Technician	Every 3 years or as determined by LHC on a case-by-case basis.
Energy Auditor	Every 3 years or as determined by LHC on a case-by-case basis.
Quality Control Inspector	Every 3 years or as determined by LHC on a case-by-case basis.

Specific Training:

Specific Training will be provided on an as-needed basis, as determined by monitoring reports, self-surveys, or other methods. It will be provided by accredited or non-accredited LHC personnel and/or third party training vendors. Specific Training will be conducted to address short-term, single issue training including but not limited to:

Training Provided	Frequency
BPI Building Analyst (BA)	As Needed
BPI Infiltration & Duct Leakage (IDL)	As Needed
On-the-job dense-pack insulation training	As Needed
Acute deficiencies in the field	As Needed
State or agency training on new 2020 SWS field guides and program guidance	Annually
Software training for administrative personnel	As Needed
Management or leadership training seminar	As Available
Weatherization conference sessions (NASCSP / HPC)	Annually
Combustion Testing	As Needed
ASHRAE 62.2 2016	Annually
Online Weatherization Assistant NEAT MHEA	Throughout WAP-BIL
Lead Safe Weatherization (LSW)	As Needed
EPA's Lead Safety for Renovation, Repair, and Painting (RRP)	As Needed
Occupational Safety and Health Administration (OSHA) Standards	As Needed
Louisiana Health and Safety Plan (WPN 22-7)	Annually

LHC will track all Grantee and Subgrantee workforce credentials via a tracking form including all Louisiana Weatherization technical personnel and the recertification requirements of those credentials. Comprehensive training will be available at a minimum of annually to avoid any potential lapses in recertification and will be monitored by LHC.

The LHC training center will be utilized for mandatory T/TA activities that are aligned with DOE curricula. Classroom, field T/TA, and hands-on facilitation will meet specific training needs of local agencies, crews and contractors statewide. LHC will track accredited mandatory IREC trainings. Mandatory attendance will be required with penalties assessed for failure to comply.

Contractors offering Weatherization will be obligated to attend certain training courses based upon their worker classification. LHC will require all direct hires and contractors, weatherization coordinators, crew members, workers, and supervisors to attend LHC training on Health and Safety in accordance to WPN 22-7. LHC will provide opportunities for WAP staff to become Building Performance Institute (BPI) Home Energy Professional (HEP) certified annually.

Field monitoring will provide an opportunity for on-site training and technical assistance and the identification of areas where more extensive training is needed. LHC will combine comprehensive analysis and assessment of monitoring, Compliance Specialist reports, field inspections and DOE Project Officer Evaluation to compare the effectiveness and the energy savings achieved to use in development of T/TA activities and priorities. The assessment of Grantee effectiveness in administering and implementing the grant will be closely aligned with the following:

- Compliance with DOE WAP federal program requirements
- General administration and program management systems
- Identify cost-effective improvements
- Install measures effectively and safely in accordance with the SWS and the LA Wx Field Guides.
- Do no harm to occupants, workers and home weatherized

LHC's training and BPI accredited testing center has and will continue to establish partnerships with IREC-accredited DOE WAP training centers. LHC staff will ensure the training center remains current and up-to-date on curriculum ensuring efficiency and innovation in administering the WAP grant. The following ongoing activities support productive training and technical assistance:

- LHC subscribes to the leading weatherization periodicals, including Home Energy and the State and Local Energy Report
- The Monitors and Trainers remain knowledgeable of developments in the field of energy conservation and work to incorporate valuable practices and techniques into existing operations

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- Training participants are solicited to provide direct feedback to LHC management through the use of evaluation forms

Pre and Post-client education on energy conservation will be documented in client files including health and safety education corresponding to relevant issues that are identified at the home. Client Education will consist of, but is not limited to:

- EPA Renovate Right for important Lead Hazard Information for Families
- EPA Mold, Moisture, and Your Home
- What You Should Know About Space Heaters
- Radon-related information
- Manuals for Installed Mechanicals

LHC will continue to evaluate the effectiveness of the State T&TA activities and needs throughout the life of the grant and make adjustments where necessary to ensure effective Subgrantee and Grantee implementation of the WAP grant.

Percent of overall trainings

Comprehensive Trainings:	65.0
Specific Trainings:	35.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	35.0
Percent of budget allocated to Crew/Installer trainings:	30.0
Percent of budget allocated to Management/Financial trainings:	10.0

V.9 Energy Crisis and Disaster Plan