

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0010000		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law	
3. Name and Address State of Nevada 1830 College Parkway, Suite 200 Carson City, NV 897060000		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		\$ 24,803,076.00		\$ 24,803,076.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 24,803,076.00	\$ 0.00	\$ 24,803,076.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) GRANTEE T&TA	(3) SUBGRANTEE ADMINISTRATI ON	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 459,974.00	\$ 149,163.00	\$ 0.00	\$ 0.00	\$ 609,137.00
b. Fringe Benefits	\$ 185,453.00	\$ 60,135.00	\$ 0.00	\$ 0.00	\$ 245,588.00
c. Travel	\$ 0.00	\$ 270,255.00	\$ 0.00	\$ 0.00	\$ 270,255.00
d. Equipment	\$ 0.00	\$ 228,560.00	\$ 0.00	\$ 0.00	\$ 228,560.00
e. Supplies	\$ 157,856.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 157,856.00
f. Contract	\$ 320,644.00	\$ 1,152,118.00	\$ 1,860,231.00	\$ 2,503,492.00	\$ 22,555,377.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 736,303.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 736,303.00
i. Total Direct Charges	\$ 1,860,230.00	\$ 1,860,231.00	\$ 1,860,231.00	\$ 2,503,492.00	\$ 24,803,076.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 1,860,230.00	\$ 1,860,231.00	\$ 1,860,231.00	\$ 2,503,492.00	\$ 24,803,076.00
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	\$ 24,803,076.00	\$ 0.00	\$ 24,803,076.00

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		\$ 609,137.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00		\$ 245,588.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00		\$ 270,255.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00		\$ 228,560.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00		\$ 157,856.00
f. Contract	\$ 12,704,514.00	\$ 3,921,366.00	\$ 93,012.00		\$ 22,555,377.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 736,303.00
i. Total Direct Charges	\$ 12,704,514.00	\$ 3,921,366.00	\$ 93,012.00		\$ 24,803,076.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
k. Totals	\$ 12,704,514.00	\$ 3,921,366.00	\$ 93,012.00		\$ 24,803,076.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00

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WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0010000, State: NV, Program Year: 2022)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Community Services Agency (Reno)	\$2,213,675.00 167
HELP OF SOUTHERN NEVADA (LAS VEGAS)	\$8,022,220.00 604
Nevada Rural Housing Authority (Carson City)	\$5,903,132.00 444
New Subgrantee Reserve (Carson City)	\$3,156,979.00 238
Rural Nevada Development Corp (Ely)	\$1,786,609.00 134
Total:	\$21,082,615.00 1,587

IV.2 WAP Production Schedule

Weatherization Plans		Units
Total Units (excluding reweatherized)		1,587
Reweatherized Units		0
Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	1,587
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	1,587
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$12,704,514.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	1,587
H	Average Program Operations Costs per Unit (F divided by G)	\$8,005.36
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$8,005.36

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	1587	29.3		46499
Prior Year Estimate	91	29.3		2666
Prior Year Actual	84	29.3		2461
Method used to calculate savings description:				

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IV.4 DOE-Funded Leveraging Activities

DOE funds have not been specifically budgeted for the leveraging of nonfederal sources of funds.

IV.5 Policy Advisory Council Members

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

Angelia Haskett	Type of organization: Unit of State Government Contact Name: Angelia Haskett Phone: 7024869580 Email: ahaskett@dwss.nv.gov
Chris Mohr	Type of organization: Non-profit (not a financial institution) Contact Name: Chris Mohr Phone: 70279505751325 Email: cmohr@helpsonv.org
Dr. Mae Worthey-Thomas	Type of organization: Unit of State Government Contact Name: Dr. Mae Worthey-Thomas Phone: 7024865990 Email: mwortheythomas@housing.nv.gov
Jennifer Rose	Type of organization: Utility Contact Name: Jennifer Rose Phone: 7758344235 Email: jrose@nvenergy.com
Jessica Mahon	Type of organization: Non-profit (not a financial institution) Contact Name: Jessica Mahon Phone: 7756243056 Email: jmahon@csareno.org
Robert Cooper	Type of organization: Other Contact Name: Robert Cooper Phone: 7758490703 Email: fmdoherty@sbcglobal.net
Robin Yochum	Type of organization: Unit of State Government Contact Name: Robin Yochum Phone: 7754343087 Email: ryochum@energy.nv.gov

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

Date Held	Newspapers that publicized the hearings and the dates the notice ran
10/20/2022	The Nevada Housing Division (NHD) implemented virtual PAC meetings via Microsoft TEAMS during COVID-19. These virtual PAC meetings have been successful, it has allowed us to record our meetings and it allows anyone in the public to attend. All future PAC meetings will be conducted virtually via Microsoft TEAMS. A copy of the public posting is attached to the SF424. The Public Hearing Posting Notice complies with NRS 232.2175 and NRS 241.015 and is detailed below. Specifically, "SECTION 3: The requirements contained in NRS 241.020(4)(a) that public notice agendas be posted at physical locations within the State of Nevada. The process for posting public notices within the State of Nevada and according to Business and Industry directives is as follows: The Nevada Housing Division does not publish advertisements in any publications, and this has been the process for several years and has been very effective. By posting to Nevada's Public Notice Website and the Nevada Housing Division Website Hearing adequate public notice is given to interested parties and is a common practice of public notices throughout the state agencies of Nevada. The Public Hearing was publicized by posting a notice on two websites. The Public Hearing notice was posted on Friday, October 7, 2022, and was noticed in the following places: Nevada Housing Division (NHD) Website Nevada's Public Notice Website The Public Hearing Notes and Public Hearing Recording are attached to the SF424 document.

IV.7 Miscellaneous

Recipient Business Officer: Steve Aichroth, Administrator, Nevada Housing Division, saichroth@housing.nv.gov, phone: (775) 6872246, 1830 E. College Parkway, Suite 200, Carson City, NV 89706 Recipient

Principal Investigator: Raul Betancourt, Weatherization Program Supervisor, Nevada Housing Division, 1830 E. College Parkway, Suite 200, NV 89706, raul.betancourt@housing.nv.gov, phone: (775) 687-2242.

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Average Cost Per Unit: The average cost per unit (ACPU) is \$8009 according to DOE BIL guidance. If the ACPU is changed during the course of the period of performance or at the start of the program year, Subgrantee funding may be recalculated to allow for a different average cost per unit and the number of completions required modified if necessary. No further public hearing will be required to change the average cost per unit. Subgrantees will be notified in writing of any changes.

Deferral Policy: Deferral may be necessary if Health and Safety issues cannot be adequately addressed. The decision to defer work in a dwelling is difficult, but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. In the judgment of the Energy Auditor, any existing conditions that may endanger the health and/or safety of the workers or occupants may cause weatherization to be deferred. A deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Subgrantee staff and contractors are expected to pursue reasonable options, including referrals, and to use good judgment in dealing with difficult situations. Subgrantees should use the Weatherization Deferral Notice form anytime it is necessary to defer a project. The form needs to contain a clear description of the problem, conditions under which weatherization could continue, and the client's signature indicating that they understand and have been informed of their options. Copies of the completed form shall be provided to the client and one shall be maintained in the client's file. If the client refuses to sign the form or if the situation is such that the Energy Auditor must leave the property immediately such as in the case of threats or potential violence, the Energy Auditor will note that on the form. In these cases, the form may be mailed to the client with a notice closing out the project.

Deferral conditions may include:

1. The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
2. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that the conditions cannot be resolved within these guidelines and at reasonable costs (i.e., repairs are beyond incidental).
3. The house has sewage or other sanitary problems including pet/animal excrement that can't be corrected through weatherization and would further endanger the client and weatherization installers if weatherization work was performed.
4. The house has been condemned or electrical, plumbing or other equipment has been "red tagged" by local or state building officials or utility companies and weatherization funds are not sufficient or corrective measures are not allowable costs.
5. The house has moisture or potential moisture problems that cannot be resolved under existing health and safety guidelines and with Incidental Repairs measures.
6. Dangerous conditions in the dwelling unit due to high carbon monoxide levels in combustion appliances or the venting which cannot be resolved under existing health and safety guidance. Subgrantees should take immediate action to ensure the appliance is not used, including instructing the client to contact a combustion appliance repair/replacement specialist.
7. The client is uncooperative, abusive, or threatening to Energy Auditor, other staff, or contractors.
8. The extent and condition of leadbased paint or any other identified hazardous condition in the house that could potentially create further health and safety hazards.
9. Pest infestation that cannot be reasonably removed or poses health concerns for workers.
10. In the judgment of the Energy Auditor, any condition exists which may endanger the health and/or safety of the contractor work crew or subcontractor.
11. Dwelling units with conditions that have the potential to create a health concern requiring more than Incidental Repair measures should be deferred.

Normal Deferral Fee: In some cases, it may be necessary to use the services of a licensed contractor to make a determination regarding the necessity to issue a deferral. This is an eligible Program Operation expense. The maximum cost a licensed contractor may be paid for the evaluation of a deferral situation is \$500. This amount is what is meant when the phrase "normal deferral fee" is used in this Health and Safety Plan.

Appeal Process: Subgrantees shall allow for the client to appeal the deferral decision of the Energy Auditor to the program manager or other appropriate management position at a higher level in their organization, except in the case when the client was uncooperative, abusive, or threatening in any way.

Davis-Bacon: The U.S. Department of Labor (DOL) is responsible for determining prevailing wages, issuing regulations and standards to be observed by federal agencies that award or fund projects subject to Davis-Bacon labor standards, and overseeing consistent enforcement of the Davis-Bacon labor standards.

Any subgrantee, contractors, and subcontractors working on BIL federally funded Weatherization contracts for the construction, alteration, or repair of weatherized multifamily buildings with no fewer than five (5) units will be required to follow Davis-Bacon requirements. All subgrantees and their contractors will follow the Davis-Bacon Act and must pay their laborers employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on Weatherization projects in the area.

All subgrantees will be required per the Davis-Bacon Act, to ensure that contractors are following local prevailing wage rates set forth by DOL. The Davis-Bacon Act applies to contractors and subcontractors performing work on BIL grant contracts.

Subgrantee Responsibilities:

- Obtain wage determination and monitor it through contract award.
- Ensure all bid, contract, and subcontract documents and sole source contracts contain the wage determination and Davis-Bacon labor standards clauses

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(contractor and sub-contractors).

- Ensure no contracts are awarded to ineligible contractors.
- Ensure the Davis-Bacon poster and wage determination are posted at the work site.
- Through monitoring ensure that payroll reports and statements are provided to determine Davis-Bacon compliance.
- Spot-check payroll reports/related records.
- Conduct confidential, onsite interviews using Standard Form 1445, Labor Standards Interview.
- Periodically review the use of apprentices and trainees.
- Report all alleged Davis-Bacon violations.
- Maintain full documentation of payrolls, certifications, interview forms, etc., for three (3) years after project completion to examine the project for auditing/monitoring purposes.

Additionally, contractors and sub-contractors must provide certifications with submitted bids agreeing to comply with Davis-Bacon requirements. If Davis-Bacon language is included in the contractors/subcontractor contract and the contractors/subcontractor signs the contract, this would cover the certification. If any portion of the construction contract is receiving BIL funding that's subject to Davis-Bacon, the entire contract is subject to Davis-Bacon. If the scope of work lists work is included in the construction contract and will be invoiced and paid thru the contractor, then Davis-Bacon applies.

Buy America, Build America: Per section 70914 of the Build America, Buy America Act (Pub. L. No. 117-58), grantees/subgrantees funded under programs that allow for infrastructure projects (e.g., construction, remodeling, and repair of weatherized multifamily buildings with no fewer than five (5) units) may not use their grant funds for these infrastructure projects or activities unless they comply with the following Buy America Sourcing requirements:

- All iron and steel used in the infrastructure project or activity are produced in the United States.
- All manufactured products used in the infrastructure project or activity are produced in the United States; and
- All construction materials are manufactured in the United States.

Fuel Switching: When appropriate and feasible, NHD will assess weatherization clients' homes to convert from fossil-fueled to highly efficient electric appliances, such as heat pump space heaters and heat pump water heaters. NHD will encourage subgrantees to utilize fuel-switching from gas and propane to electric, helping achieve the Biden Administration's goal of delivering more equitable clean energy.

Policy Advisory Council: The Policy Advisory Council (PAC) meets several times a year. Once in the Spring to review the DOE State Plan and to attend any other pending business. At other meetings, it reviews year-to-date production and end-of-year production from the prior year. This is for the purpose of seeing if subgrantees met their goals for the previous program year and to see if they are on track for the current program year. This also allows the Subgrantees to voice their opinions on the State Plan contents. All PAC meetings follow provisions set forth in 10 CFR 440.14.

Attached to the SF424 is a copy of the minutes prepared from the most recent PAC Meeting on July 14, 2022. These minutes will be presented for adoption at the next PAC meeting, which is anticipated in September through October of 2022.

PAC members fill the following categories:

- Jessica Mahon - Subgrantee Representative
- Dr. Mae Worthey-Thomas - (ViceChair) NHD Representative
- Jennifer Rose - (Chair) Utility Company Representative
- Robin Yochum - At Large, Consumer Group (Energy) Representative
- Chris Mohr - At Large, Consumer Group (Low Income) Representative
- Angelia Haskett - DWSS Representative
- Robert Cooper - At Large Representative

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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

The State of Nevada (State) Weatherization Assistance Program (WAP) defines an income-eligible household for Department of Energy (DOE) funding as a household whose total gross income is at or below 200% of the National Poverty Income Guidelines established by the Office of Management and Budget. For the purposes of the DOE funding, this is the definition of low income.

The Nevada Housing Division (NHD) ensures compliance through the use of the State's Weatherization Application and Eligibility Determination Worksheet. Each application identifies the applicant's household income and family size necessary for making a determination of income eligibility. Per our Weatherization Administrative Manual, an applicant is required to submit copies of appropriate documents allowing the Sub-grantee the ability to calculate the annual income of all applicable household members.

Weatherization Program Notice (WPN) 22-5: Expansion of Client Eligibility in the Weatherization Assistance Program, issued by the U.S. Department of Energy (DOE), serves to streamline the WAP intake process by expanding WAP's categorical income eligibility to include the U.S. Department of Housing and Urban Development's (HUD) means-tested programs' income qualifications at or below 80% of Area Median Income. (examples of HUD programs but not limited to Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), Lead Hazard Control & Healthy Homes Program (OLHCHH), etc.).

WAP already has a provision, codified in 10 CFR 440.22(a)(3), to allow the inclusion of households that are income-eligible for the U.S. Department of Health and Human Services (HHS) Low Income Home Energy Assistance Program (LIHEAP). DOE anticipates Grantee implementation of categorical eligibility for HUD means-tested programs would be similar to the existing eligibility that DOE WAP currently has with Health and Human Services (HHS) Low-Income Households Energy Assistance Program (LIHEAP).

DOE WAP, HHS LIHEAP, HUD Lead Hazard Control, and Healthy Homes Programs, and Department of Veteran Affairs (VA) have collaborated on how to better support interagency coordination, specifically in the area of client eligibility. Each of the agencies serves households with lower incomes, using varying income eligibility requirements.

Current income eligibility guidelines include:

- DOE's WAP accepts households using up to 200% of Federal Poverty Guidelines (FPG).
- HHS' LIHEAP accepts households using 150% of FPG, or states may elect to use 60% of State Median Income (SMI), whichever is greater for their respective state. Each Grantee is permitted under 42 U.S. Code § 8624(b)(2)(B) to set an income limit within this range.
- HUD's means-tested programs accept households using percentages of Area Median Income (AMI) ranging from 30% AMI to 80% AMI, depending on specific program parameters. HUD uses 4,684 Fair Market Rent (FMR) areas to establish AMIs, based on metropolitan areas and non-metropolitan counties.
- VA has no income-based eligibility programs to align with this purpose and is therefore not included in the scope of this expanded definition of income eligibility.

The effort explored the overlap in incomes of the different households served through the various programs. The overlap is sufficient to consider "categorical income eligibility", defined across programs as automatically granting program eligibility to applicants who have already met the eligibility requirements of another agency's identified program.

Describe what household eligibility basis will be used in the Program

The State's DOE-funded program eligibility is based on income at or below 200% of the poverty level determined in accordance with criteria established by OMB (above). NHD Weatherization Administrative Manual outlines allowable client eligibility documentation which might include pay stubs, Social Security benefits letters, and other applicable documentation of income. This manual is reviewed regularly and updated as needed. During the file monitoring, files are reviewed for all required documents. A copy of the Weatherization Administrative Manual is attached to this application.

National Poverty Income Guidelines are distributed annually and the Eligibility Determination Worksheet is also updated at that time. Sub-grantees utilize an Eligibility Determination Worksheet which gives preference to the elderly, disabled, and families with children under six years of age. Also, households with a high energy burden are given preference. Where an applicant receives income for a part of the applicable tax year, their partial income may be annualized to

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determine eligibility. If there is a waiting list and a client is not served promptly, client eligibility documentation is reverified and updated every 12 months. Health and Human Services guidance is used for providing services to Qualified Aliens. Nevada utilizes the National Poverty Income Guidelines and Definition of Income provided by DOE annually which includes annual revisions that are then distributed to the Sub-grantees to use when qualifying clients for the DOE-funded portion of the WAP.

Weatherization Program Notice (WPN) 22-5: WAP Grantees and Subgrantees may certify that applicants have met the income requirements of HUD means-tested programs through mechanisms including, but not limited to, applicant documentation, interagency lists of recipients, shared system databases, etc. The method of verification of eligibility must be included in the client file.

The beneficiaries of this change include:

1. DOE WAP Grantees and Subgrantees – allowing qualified households for means-tested HUD Programs to be categorically eligible for the WAP.
2. Low-income eligible households are being served by removing the additional burden of applying for and submitting the same documentation to multiple programs to receive comprehensive services.

Extending WAP categorical eligibility to applicants who meet HUD's income eligibility requirements better facilitates referral services for low-income households, reducing the burden on both intake agencies and impacted households trying to obtain services. Better coordination and alignment encourage leveraging (or braiding) of multiple funding sources, reduces complexity, and results in further energy efficiency upgrades and savings for low-income households.

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

The State's WAP utilizes guidance provided by Health and Human Services under the Low-Income Home Energy Assistance Program (LIHEAP).

The guidance is as follows:

WAP services are provided only to U.S. citizens or qualified aliens.

"Qualified aliens" are defined in section 431 of Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), commonly known as the Welfare Reform Law. The Act covers the larger groups of legal immigrants (legal permanent residents, refugees, asylees, individuals paroled into the U.S. for a period of at least one (1) year, individuals whose deportation has been withheld, individuals granted conditional entry, and certain individuals who are victims of domestic abuse). Qualified aliens are eligible to receive assistance and services under the LIHEAP program so long as they meet other LIHEAP program requirements.

As states set their eligibility requirements for LIHEAP-funded benefits, they are to ensure that they are in full compliance with Federal provisions related to verification of qualified alien status in providing services. State procedures for verifying U.S. citizenship or immigration status of applicants should be in accordance with the United States Department of Justice's (DOJ) Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, published November 17, 1997 (62 FR 61344). In addition, states should refer to LIHEAP-IM-98-25, dated August 6, 1998, which discusses the DOJ Interim Guidance and its applicability under the LIHEAP program.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Single-family and manufactured housing (mobile homes), and multifamily dwellings are all eligible for weatherization. Proof of ownership is required to be submitted with the application and may be verified through the county assessor's records. Applications can be processed from eligible clients for rental properties with the owner's authorization. The rental household must meet the income qualification as described above.

Describe Reweathering compliance

Per WAP Memorandum 075, stating, "On December 27, 2020, President Donald J. Trump signed into law P.L. 116-260, an omnibus legislative package that includes several significant changes for the Weatherization Assistance Program." Included in these changes is a modification to the re-weatherization policy removing the old date of September 30, 1994, and creating a "rolling" option allowing for dwelling units to be re-weatherized **15 years after the date such as**

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previous weatherization was completed.

NHD will be following this new policy in determining the building eligibility for new DOE and LIHEAP weatherization assistance. Sub-grantee will use their existing database containing project information from prior years, known as the BWR database in making this determination and will track new projects in the WxPro database as they are completed for a period of 15 years. This new policy will also apply to projects that received funding under LIHEAP, HUD, or USDA for weatherization activities.

Describe what structures are eligible for weatherization

Single Family manufactured housing and multi-family dwellings are all eligible for weatherization. Non-traditional dwelling units such as shelters and apartments over the business, etc. may be weatherized only if program regulations are met. These types of units must be discussed with the NHD staff and approved by the DOE Project Officer prior to weatherization.

NHD does **not** allow for the weatherizing of travel trailers or other non-stationary campers that are registered with the Department of Motor Vehicles because they are not considered permanent stationary housing. Additionally, the use of a post office box for a non-stationary camper or trailer does not make it an eligible structure for weatherization.

Signed and approved by all parties involved, the State Historic Preservation Programmatic Agreement was recently extended for an additional 10 years until December 31, 2030. The NHD Weatherization Assistance Program and its sub-grantees are required to adhere to the conditions of the Programmatic Agreement in evaluating all projects prior to weatherization work being performed.

Weatherization Program Notice (WPN) 22-5: Multifamily-Specific Guidance

WAP Providers generally encounter three types of multifamily properties assisted by HUD: (1) housing owned and operated by HUD Public Housing Agencies (PHAs), (2) privately-owned multifamily buildings receiving project-based assistance, and (3) privately-owned multifamily buildings that house residents who receive tenant-based (housing voucher) assistance.

- Housing owned and operated by PHAs: WAP providers shall consider all such buildings managed by the PHAs to be 100 percent income eligible.
- Privately owned multifamily buildings receiving project-based assistance: WAP providers should refer to these lists 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: WAP providers 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.

Describe how Rental Units/Multifamily Buildings will be addressed

Building eligibility will be determined by following the final rule published on December 8, 2000, where DOE provided guidance on what types of large multifamily buildings may be subject to the 50% threshold (65 Fed. Reg. 72210, December 8, 2000). Certain buildings containing rental units may comply with the income eligibility requirements when 50 percent of those dwelling units are eligible dwelling units rather than the established 66 percent identified in the regulations (10 CFR §440.22(b)(2)). The buildings that are subject to the 50 percent threshold are duplexes, four-unit buildings, and certain eligible types of large multifamily buildings. For all other multi-family units not less than 66% of the dwelling units must be eligible in order to weatherize the entire building. Benefits in rental units will accrue primarily to the low-income tenants residing in the units.

Rental units may be weatherized, however, a 50% landlord contribution is required for the replacement of all capital improvement items such as HVAC equipment, windows, and water heaters unless it is a repair item of less than \$2,000. No undue or excessive enhancements are allowed on rental properties. A landlord contribution is not required on single-family and mobile home rentals. 10 CFR 440.22 (b)(2) may be used on 2-4 units and 5+ units.

Renters' rights are protected from eviction by having the landlord sign the Landlord Weatherization Service Agreement that states they will not raise the rent due to WAP repairs that may have increased the value of the property. Also, landlords may not evict for other than normal circumstances but not due to the weatherization of the property garnering more rents on the open market. Rental units are protected in accordance with 440.22(b)(3) and renters' rights are protected as specified in 440.22(b) 3 and (c)-(e) The Weatherization Service Agreement must be signed by the landlord or management company prior to work beginning.

NHD utilizes a Weatherization Service Agreement and it must be signed by the landlords or property managers prior to work commencing. The Weatherization Service Agreement states that rents cannot be raised due to work being done from weatherization for a minimum of one (1) year along with other tenant protections.

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Describe the deferral Process

Deferrals are required for a variety of reasons such as the condition of the structure: building integrity or the ability to effectively weatherize the structure. Also, if the dwelling is slated for redevelopment. If there are Health and Safety conditions that might exist but are able to be remedied by the homeowner, 30 days are given for the homeowner to correct them. If thirty (30) days pass and the problem has not been corrected the file is closed and the client may requalify and reapply when they have made the corrections to the property. When there are issues that cannot be corrected or there are unsafe conditions for the contractors' staff (illegal substance abuse) the dwelling can be permanently deferred. If a property is beyond the scope of weatherization it may also be permanently deferred. If it was necessary to use a licensed contractor to make a determination on the need for a deferral, a fee of up to \$500 may be charged by the contractor.

When possible, the client is notified of other programs and agencies that might be able to address the rehabilitation of the property. When properties are deferred, the client is given a copy of the deferral form notifying them why the property is either temporarily deferred or permanently deferred. The client is asked to sign and acknowledge receipt of the deferral form. The deferral process is further explained in the Health & Safety Plan attached to this application, which includes a copy of the State's deferral form.

Weatherization Readiness Fund: Through the Weatherization Readiness Fund (WRF), WAP can address necessary repairs (e.g., Health and Safety issues, structural) in dwellings that have been deferred from receiving weatherization services. Deferrals occur in WAP for two key reasons, regulatory (10 CFR 440) limitations and/or management decisions at the state and local levels. Regardless of the cause, deferrals create "sunk costs" – the cost of sending field staff out to evaluate a home that cannot ultimately be treated because the Program is unable to address the repairs of the building.

WRF is designated for use in addressing structural and health and safety issues of homes that are currently in the queue to be weatherized but at risk of deferral. This funding is specifically targeted to reduce the frequency of deferred homes that require other services, outside the scope of weatherization, before the weatherization services can commence. Units receiving WRF must result in a DOE completion defined as, *"A dwelling on which a DOE-approved energy audit or priority list has been applied and weatherization work has been completed."*

These funds can be used to create a more sustainable housing stock for our most impacted families. With the addition of these Weatherization Readiness Funds, subgrantees will be able to bring more housing into weatherization readiness than before, reducing deferrals, increasing energy savings, and providing multiple other benefits to individuals and families that would have otherwise been left unserved.

Average Cost Per Unit: The average cost per unit (ACPU) is \$8009 according to DOE guidance. Readiness funds max amount is \$800 per household if additional funds are needed subgrantees will need to contact NHD for approval.

V.1.3 Definition of Children

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

V.1.4 Approach to Tribal Organizations

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

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

Low-income tribal members and other low-income persons are treated equally. NHD does not recommend nor is their sufficient funds to provide DOE weatherization funding directly to members of Native American tribes. Low-income members of Native American tribal organizations will receive benefits equivalent to assistance provided to other eligible persons living within the program's service areas. Approximately 4% of Nevada's population is comprised of individuals of Native American descent.

V.2 Selection of Areas to Be Served

The service areas proposed for the program year are based on the following: the estimated number of eligible households located in each county; the availability of funds to provide assistance to the rural counties, and the availability of qualified service providers. The Weatherization Assistance Program's service area includes service to almost all areas and counties within the state and revenue streams have been adjusted to assure sufficient funds are available to provide

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assistance in the rural areas of the state.

There are five service areas:

Clark County contains 68.5% of the state's eligible population and has been divided into two service areas:

1. the City of North Las Vegas and northern rural Clark County 20.5%.
2. the City of Las Vegas, the City of Henderson, and southern rural Clark County 48%; and
3. Washoe County comprises 15.5% of the eligible population and is a separate service area.
4. The eastern rural service area which is comprised of Esmeralda, Elko, Eureka, Humboldt, Lander, Lincoln, Mineral, Nye, White Pine, and Pershing counties contains 8% of the state's eligible households.
5. The western rural service area is comprised of Carson, Churchill, Douglas, Lyon, and Storey counties and contains approximately 8% of the eligible population.

The total distribution of Weatherization funding is mostly based on population, except in eastern and western rural service areas. In these areas, an additional 2% each was provided to assist with the higher costs of doing business in remote areas of the state.

DOE is one of five funding sources available to the State of Nevada for our Weatherization Assistance Program. The actual awards of DOE funding may not reflect the above percentages because some sub-grantees are better suited to expend funds from a particular source. The State's total distribution of funds to the sub-grantees in each service area above equals the percentage distribution. However, adjustments may be made based on the performance of the Subgrantees.

V.3 Priorities

Priority is given to the elderly, persons with disabilities, families with children under 6, and high energy burden households. Priority assistance is determined by a point evaluation matrix that awards additional points to residential energy users due to the utilization of heating oil or propane as their primary source of heating. A household that qualifies for and receives Energy Assistance payments from the Division of Welfare and Social Services is defined as a having high energy burden.

V.4 Climatic Conditions

Nevada's climate varies dramatically from north to south. Perhaps the clearest indicator of the climatic conditions being addressed by the Weatherization Assistance Program is the number of heating and cooling degree days associated with each area scheduled to receive weatherization assistance. Typically the northeastern portion of the state has the highest number of heating degree days while Clark County has the highest number of cooling degree days. Listed below are the heating and cooling degree days associated with the various service areas of the state and derived from the period of time from 1961 to 1990:

*** Average Heating Degree Days (Base 65 F)**

- Clark County & Henderson: 2,601
- Western Service Area & Washoe County: 6,022
- Eastern Service Area: 7,236

*** Average Cooling Degree Days (Base 78 F)**

- Clark County & Henderson: 3,201
- Western Service Area & Washoe County: 508
- Eastern Service Area: 320

***Source:**

Mechanical Engineering Department

University of Nevada – Reno

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V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

The Nevada Housing Division worked with the Southwest Building Science Training Center (SWBSTC) to update our field guides to align specifications, objectives, and desired outcomes outlined in the Standard Work Specifications for Home Energy Upgrades (SWS). The field guide, aligned with the SWS, has been approved by DOE and went into effect on May 29, 2018. There were no Variance Requests submitted as part of the field guide. It can be accessed at: <https://swbstc.org/resources/nv-field-guide>

Although the current field guide approval is set to expire on May 29, 2021, NHD is working with Home Energy Connection to revise the Field Guide making it consistent with DOE guidance in WAP Memorandum 070. NHD will continue to provide updates to DOE staff until the revised field is submitted for approval.

Due to staffing changes, Raul Betancourt, Weatherization Program Supervisor is having new staff update field guides and all weatherization manuals.

The State of Nevada Program Assurances includes language that all Sub-grantee agreements and vendor contracts, must include language which clearly documents the SWS for work quality as outlined in WPN 22-4, Section 2, for DOE-funded projects.

The program's Sub-grantees are responsible for the installation of DOE approved measures. All work done is consistent with NHD's DOE approved energy audit and materials used are consistent with 10 CFR 440 Appendix A - Standards for Weatherization Materials.

Typical Measures include:

1. Insulation: ceiling, floor, side wall, and duct.
2. Duct leakage sealing (return, plenum, and supply systems).
3. Shell infiltration sealing; i.e., replace broken glass, window and exterior door replacement, door weather-stripping, caulking, and evaporative cooler covers.
4. Insulation of water heater and water heater pipes.
5. Low-flow showerheads.
6. Solar screens.
7. Heating and cooling system repairs and/or replacements.
8. Refrigerator replacement. (Standalone freezers and units with water or ice makers are not allowed.)

NHD has received approval for LED bulbs and General Heat Waste items that are not included in Appendix A.

When possible, blower door diagnostics will be performed on each single-family and mobile home unit receiving weatherization assistance to ensure compliance with Indoor Air Quality Standards. A blower door duct test will be done in multifamily buildings when changing out HVAC units. In accordance with our Health and Safety Plan, a combustion appliance safety inspection will be performed on each dwelling unit containing a combustion appliance (furnaces, water heaters, ovens, cooktops, and gas dryers) when shell sealing will be performed. A final QCI inspection will be performed by the program's Subgrantees on each home receiving weatherization assistance with DOE funding.

The State of Nevada Program Assurances has been updated to include language requiring the Sub-grantees to pass on these standards in their agreements with contractors and vendors to ensure the work quality outlined by NHD is achieved with their performance.

Field guide types approval dates

Single-Family:
Manufactured Housing:
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: WxPRO (North Dakota & Nevada)
Approval Date: 7/10/2018

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Audit Procedure: Manufactured Housing
Audit Name: WxPRO (North Dakota & Nevada)
Approval Date: 7/10/2018

Audit Procedure: Multi-Family
Audit Name: WxPRO (North Dakota & Nevada)
Approval Date:

Comments

The State of Nevada DOE-funded Weatherization Assistance Program falls below the 20% threshold for multifamily units and does not require a DOE-approved energy audit and procedures for multifamily buildings. NHD has other funding sources available for weatherizing multifamily buildings and typically these other sources would be used instead of DOE funds.

Nevertheless, if NHD does receive a request from a Sub-grantee to weatherize a multifamily building, the Sub-grantee will be required to conduct a WxPro Energy Audit to ensure that the eligible occupants receive appropriate, cost-effective weatherization services. This will be done on a case-by-case basis. At the time a multifamily project is considered, NHD will submit to our DOE Project Officer the necessary energy audits and any other requested documents to approve the multifamily project prior to commencing weatherization of the multifamily building.

V.5.3 Final Inspection

All individuals who perform final inspections and monitoring including Sub-grantee and NHD are required to have staff that is QCI certified or to contract for these services. NHD will continue to use Home Energy Connection, a third-party agency for QCI services, training, and other technical assistance such as the update of the field guide.

NHD provides to all Sub-grantees a copy of relevant policies and procedures that govern the QCI process in accordance with WPN 22-4. Every DOE-funded weatherization unit reported as a completed unit receives a final inspection ensuring all work meets the minimum specifications outlined in the SWS in accordance with 10 CFR 440.16(g). Attached is an inspection form and a typical report generated by the NHD's third-party inspector.

If through statewide monitoring, a pattern of failure is evident, the responsible agency will receive disciplinary action and the possibility of the reallocation of current funding and the loss of future funding. The severity of the loss depends on the nature and severity of the failures.

In Sub-grantee agencies where the energy auditor performs the audit, creates the work order, and performs the final quality control inspection NHD performs quality assurance reviews on at least 10% of all completed units. In agencies where the QCI has no prior involvement in the work on the home or the energy audit, the NHD third-party inspector performs at least a 5% review of all completed units. However, the Nevada DOE program in some areas is so minimally funded that it does not allow for a separate energy auditor and inspector. Nevada does its best to serve all areas of the state with some areas only receiving a small portion of funding. Regardless, in practice in prior years, at least 10% of all DOE-funded projects are inspected by NHD. Final inspections are performed on 100% of the units weatherized at the Sub-grantee level by a certified QCI person.

Specific language regarding QCI inspections on all DOE-funded work is contained in the Program Assurances (Sub-grantee agreements) which have been attached to this application. Below is an excerpt from that document.

"The Subgrantee is to conduct an inspection on each household weatherized no later than three (3) weeks following the work being reported as completed by the Contractor(s) or installer. Subgrantee may not reimburse the Contractor for costs related to any work which has not passed final inspection. All units completed and funded in part or entirely with DOE funding shall be inspected by a Quality Control Inspector (QCI) for its final inspection ensuring that all work meets the minimum specifications outlined in the SWS."

Over time with the update of the new database, the energy audit and the final inspection shall all be web-based and aligned with SWS ensuring that work is completed in accordance with the work quality requirements outlined in WPN 22-4. Both the NHD and Sub-grantees will be using this coordinated process for inspections and monitoring.

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V.6 Weatherization Analysis of Effectiveness

The effectiveness of Sub-grantee weatherization projects is assessed by adherence to energy audits using a tool approved by the Department of Energy and also by monitoring of completed units done by NHD. NHD sends out monthly quality assurance postcards to clients after weatherization is complete to receive feedback on their experience and interactions with subgrantee staff, contractors, and NHD monitors. It provides good insight into program perceptions and expectations and if those expectations were met or how we can improve these interactions.

Productivity and energy savings between Sub-grantees is not compared as housing stock is dissimilar in different areas of Nevada and also varying funding which is based on population. Sub-grantee production is compared to projected or expected outcomes that NHD establishes when grant funding is awarded. Benchmarks are established by NHD and evaluated quarterly. If the Sub-grantee is not meeting expected benchmarks NHD meets individually with that Sub-grantee to see how production can be improved and what obstacles may need to be overcome.

When a Sub-grantee is not meeting its goals and also during office and field monitoring, NHD assesses what Training and Technical Assistance (T&TA) activities are required. Each year Sub-grantees are queried on T&TA needs. Also, during Sub-grantee meetings, time is devoted to T&TA questions Sub-grantees might have and observations of NHD staff found during field and office visits.

Training capability is assessed in the field during monitoring visits. An Inspection Report is completed after each visit and there is an exit interview with Sub-grantee staff discussing any findings/issues and what is being done well. Corrective action is required within thirty (30) days when findings were noted.

All Sub-grantee field staff must be BPI certified. Training by NHD is ongoing and takes on formal and also informal training. If a subgrantee's work is found not to be up to the standard they are shown the correct way to install. All work completed in the field is done by licensed contractors who are aware of building and code requirements and must work to those standards. All final inspections and field monitoring will be done by a QCI-certified staff member. Work in the field shall be completed pursuant to meeting the Standard Work Specifications (SWS) adopted by NHD and approved by DOE.

Performance reviews are done as stated above with summary reports of finding which must be responded to within thirty (30) days. NHD spot checks any work that did not pass inspection. Work is done at the contractors' expense.

NHD is constantly reviewing our management mechanisms and will affect change when necessary or when problems are observed.

Every year a financial review of all subgrantees is undertaken by NHD Audit/Accounting Staff. All subgrantee financial systems and processes are reviewed at that time.

During the annual file review, NHD conducts a review of the invoiced costs to ensure that no duplicate billing has occurred and that all costs billed are based on the approved costs. Sub-grantees are required to engage in a competitive bidding process at least every five years, with contractor pricing updated annually. See attached Request for Quotation (RFQ) that Sub-grantees are required to use for this process.

To secure new program contractors, a Sub-grantee must go through the formal procurement process using the RFQ and pricing is one of several factors that are considered in selecting new contractors to perform weatherization work. Each year contractor pricing is reviewed and compared against competitors. Contractors with the lowest overall price are rewarded with the majority of the work of that Sub-grantee. Staff reviews contractors' costs to see if there are any large increases in pricing (i.e., over 5% increase) and may question the reason for the price increase.

Subgrantees must be successful in administrating cost-effective programs designed to assist the program's targeted population. Monitoring reports, financial audits, on-site inspections, and client survey reports indicate if Sub-grantees are administering cost-effective programs and are in compliance with state and federal rules and regulations.

All Sub-grantees must have available personnel that has received weatherization training including, blower door diagnostics, combustion appliance testing, energy auditing, inspection protocol, and health and safety hazard awareness. All Sub-grantees weatherization staff members need to be certified through the Building Performance Institute's Building Analyst series. Also, all Sub-grantees must have at least one Quality Control Inspector (QCI) on staff or under contract to meet the DOE program requirements.

V.7 Health and Safety

The Nevada Weatherization Health and Safety (Plan) uses the DOE template and Table of Issues per WPN 22-7 and it is an attachment to this State Plan and Application. If time permits next year, we will look at updating the most current DOE template. However, no updates were made in the current year.

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Due to COVID inflation, the cost of materials has increased dramatically. For that reason, NHD has an ACPU percentage of 17.8% higher than what is justified. This is due to predicting supply prices being raised throughout this five (5) year BIL grant due to inflation. For that purpose, NHD has added a buffer cap to possibly ensure we stay within this predicted budget.

Prior year modification now includes H&S funds being used to bring hinges on fire doors up to current code when necessary. This is standard for Fire Doors and Other Opening Protectives per NFPA80, <https://idighardware.com/2016/07/decoded-nfpa-80-requirements-for-hinges/>. Further research suggests that if the door is a twenty (20) min rated then self-closing is required as that is part of the rating of the door. However, you can have doors installed between the garage and residence that do not require self-closing hinges.

According to the source below, SPF provides both insulation and air sealing benefits when installed to the manufacturer's specified depth. These benefits are applicable to both existing and new roofs when installed per manufacturer. <https://www.finehomebuilding.com/2013/02/01/spraying-polyurethane-foam-over-an-existing-roof>

Radon: Installing a 6 mil vapor barrier to stop the migration of radon also stops moisture transfer that can lead to moisture issues in a crawl space such as degrading insulation and damaging the wood subfloor.

Safety Devices such as Smoke and Carbon Monoxide Alarms, Fire Extinguishers, and one CO alarm are being installed in every home, regardless of the heating appliance type or fuel source (pursuant to ASHRAE 62.2-2016).

For Ventilation and Indoor Air Quality, NHD will update the narrative to reflect the current language used in the Standard such as "whole house" ventilation that has been changed to "dwelling unit" ventilation.

NHD will continue to provide training to our Sub-grantees on the updated Plan. Radon and Radon testing are issues that continue to be addressed through training courses.

The Plan includes:

- Intake procedures (e.g., capturing per-existing occupant health conditions).
- Deferral policies due to Health and Safety reasons (e.g., client notification, list of measures, appeal process, referral of clients to other services).
- An expression of the Health and Safety cost limit as a percent of the average cost per unit.
- Details on training plans for Health and Safety issues including continued training on ASHRAE 62.2-2016.

V.8 Program Management

V.8.1 Overview and Organization

The State of Nevada Weatherization Assistance Program is administered within the Nevada Housing Division (NHD), a division of the state's Department of Business and Industry. **This State Energy Program is housed in the NHD offices both in Carson City (1830 E. College Parkway, Suite 200) and Las Vegas (3300 W Sahara, Suite 300) offices.**

Additionally, NHD utilizes tax-exempt and taxable mortgage revenue bonds to provide a source of mortgage revenue that cannot be supplied by the private sector to low- and moderate-income households. NHD administers the Single and Multi-Family Bond Programs, Loan Servicing Program, HOME Program, and the Low Income Housing Trust Fund. A copy of NHD's organizational chart is included as an attachment.

Currently, there are three (3) full-time positions funded through the state's Weatherization Assistance Program; a Program Supervisor, a Grants and Projects Analyst II, and a Weatherization Compliance Inspector. Our Compliance Inspector has tried on several occasions to become QCI certified but he has not been able to pass the testing. NHD currently uses Home Energy Connection, a third-party agency for QCI services.

DOE funding is a small portion of the State of Nevada's Weatherization Assistance Program. NHD's main funding source for weatherization activities is the Universal Energy Charge (UEC), a user fee on customers' utility bills. The program is identified as Fund for Energy Assistance and Conservation (FEAC) and it generates approximately three times the amount of funds annually awarded by DOE. NHD also uses funding provided by the Governor's Office of Energy (GOE) and Housing Trust Funds to augment the state's Program. Although NHD does receive some Low-Income Home Energy Assistance Program (LIHEAP) funds, NHD does not directly administer this program. NHD receives a 5% pass-through of LIHEAP funds annually from our Department of Health and Human Services. The majority of these funds go towards the Energy Assistance Program. Whenever possible, NHD tries to leverage various funding sources in projects to allow for more measures and added energy savings, choosing the best funding source(s) for each project to maximize benefits.

Every year our Sub-grantees are required to respond to NHD's Request for Application for Service Providers (RFA). This process has been used by NHD for

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many years. The requirements and timeline for submittal are described in the attached RFA. The process will commence in May 2022, with the release of the RFA. Responses were due back to NHD by June 2022. Sub-grantees that continue to perform well in their existing Service Areas are anticipated to be awarded those same Service Areas.

NHD has a Weatherization Administrative Manual (WAM) that is reviewed and updated as necessary. The manual includes overall program management which addresses inventory control, the application process, database operation, management, procurement, and other necessary program information. The WAM is an attachment to this application.

V.8.2 Administrative Expenditure Limits

Pursuant to WAP Memorandum 075, NHD will use the full 15% allowed by DOE for administrative costs, which states that "The 2022 Application Instructions will be amended that not more than 7.5 percent may be used by the Grantee for such purposes, and not less than 7.5 percent must be made available to Subgrantee by the Grantee.

NHD will use only five (5) percent for its administrative costs and provide each of its sub-grantees ten (10) percent for their administrative costs. For 2022, NHD will **not** be awarded an additional five (5) percent for recipients of grants of less than 350,000.

NHD utilizes five (5) percent administration for DOE WAP and currently has only three (3) employees. DOE funding provides a small portion of the State's staff salaries, which is approximately twelve (12) percent, and related fringe benefits. NHD is fortunate to have other funding sources for weatherization to cover the remaining portion of salaries and fringe benefits since Nevada's DOE allocation is relatively small.

V.8.3 Monitoring Activities

Each Sub-grantee is responsible for administering their program in accordance with the rules and regulations established in 10 CFR, Part 440 and 2 CFR, Part 200, applicable OMB circulars, Weatherization Program Notices, and other procedures DOE may require. Monitoring of Sub-grantees encompasses monitoring policy and procedures outlined in WPN 20-4 and are included in our Sub-grantee Administrative Manual, Field Manuals, and other related documents.

As identified below, NHD monitoring staff are paid from both the Administrative Budget and the Training and Technical Assistance budget. Based on the current year DOE allocation of \$24,803,076, it is anticipated that the Grantee Administrative budget (\$1,860,230) and NHD's Training and Technical Assistance budget (\$1,860,231) will be allotted for monitoring activities for the life of the 5-year BIL Grant. The Training and Technical Assistance budget contains a cost of \$85,000 for a contract for Quality Control Inspector (QCI) services and includes the cost of vehicles and travel in addition to staffing costs.

Presently the NHD staff primarily involved in the monitoring process include the Grants and Projects Analyst II, the Compliance Inspector, and the Accountant III. For the current program year, NHD is also using a third-party agency, Home Energy Connection, for Quality Control Inspector (QCI) services. Individual duties are further explained in the following details of the monitoring process below.

All Sub-grantees receiving WAP funding are monitored annually and the monitoring encompasses the following:

- Financial/Administrative/Procurement
- Equipment/Inventory/Materials
- Eligibility
- Quality Assurance I Records Retention
- Qualifications and Training
- Feedback and Reporting
- Onsite Inspections
- Assessments, Energy Audits and
- Health & Safety

Office and Financial Review: The Nevada Housing Division (NHD) conducts a comprehensive Office and Financial Review of each Sub-grantee at least once annually utilizing NHD's monitoring document. **The visit consists of the following:** file reviews of client files, insurance and maintenance records, financial desk review and annual review of financial statements, an inspection of tools and equipment, and procurement practices. Any required subsequent visit will include a review of corrective action taken on prior findings. The Grants and Projects Analyst II performs the file review and an Accountant III performs the

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financial review. *(The Accountant III is not under the direction of the Weatherization Program Supervisor but instead is under the direction of NHD's Chief Accountant.)*

Files are reviewed with regard to income verification/eligibility, completion of all required forms, adherence to priority measures, prioritization of clients (elderly, disabled, children, etc.), and documentation of contractor invoices. Upon completion of the review, an exit interview is conducted with the Sub-grantee's executive director/president or representative, and a written report is submitted within thirty (30) days following the review. The written report identifies any findings, required corrective action, and deliverables within a specified time frame. NHD works with the Sub-grantee in developing any training or technical assistance designed to correct the identified problems. Failure to comply with the report's recommendations or other corrective actions may result in the withholding of requested funds until resolution has been achieved. A comment card questionnaire is sent to most clients receiving weatherization assistance requesting their opinion on the assistance provided. These questionnaires are reviewed every couple of months by NHD staff and if necessary, forwarded to the respective agency for follow-up. The work detailed above is the responsibility of the Grants and Projects Analyst II.

Each Sub-grantee is required to have an agency-wide audit conducted at the close of their fiscal year. It must include a Single Audit Report of all Federal funds received by that Sub-grantee (not just Department of Energy funds) if the total received is greater than \$750,000. Any audit findings regarding the Federally Funded WAP program and corresponding resolutions will be reviewed by Accountant III and forwarded to the Sub-grantee's president/executive director. The Weatherization Program Supervisor is responsible for overseeing all aspects of the Sub-grantee monitoring process and its successful conclusion.

Description Of Onsite Monitoring: A minimum ten percent (10%) field review is conducted that includes; measures installed by the Sub-grantees that are inspected by the Weatherization Compliance Inspector and the third-party QCI consultant to ensure compliance with the specifications outlined in Appendix A of 10 CFR, Part 440 (Standards for Weatherization Materials) and energy audits conducted on a DOE approved energy audit tool. During the course of the monitoring visits, the prices being paid for materials are discussed and comparisons are made with respect to the contracted costs approved by the Sub-grantee at the onset of the program year. The prices paid for a specific item will vary from one Sub-grantee to the other depending on the availability of materials and the distance from the supplier. Pre, during and post-work inspections are made by NHD staff over the course of the monitoring visit. These inspections are necessary to ensure the measures recommended by the energy audit, incidental repairs, and applicable Health and Safety standards are in fact being followed. Onsite post inspections compare the measures generated from the energy audit to the completed measures. The energy audit tool determines which measures are most cost-effective and ranks them in ascending order. The energy audit tool takes into consideration factors such as type of housing stock, heating/cooling degree days, cost of energy, and installed costs.

For onsite monitoring by NHD and in cases where the Sub-grantee's energy auditor performs the audit, creates the work order, and performs the final QCI, NHD will perform quality assurance reviews on at least ten percent (10%) of all completed units. In the cases where the audit and final inspection are done by the same person, NHD's QCI will ensure that the individual performing these tasks is able to consistently perform both tasks. The NHD QCI will evaluate whether these processes are performed consistently and correctly or if additional training is required. In the larger Sub-grantee agencies where the duties of an energy auditor and final inspector are segregated, NHD may perform a minimum of five percent (5%) inspections but will usually inspect ten percent (10%) of the completed projects. In cases where significant deficiencies are found during the monitoring visit, NHD will increase the number and frequency of these inspections. Field monitoring in the prior and current years has not revealed any significant deficiencies in either quality of work or final inspection processes.

If a Sub-grantee's QCI fails to adequately inspect the guidelines in the field guide additional training will be provided and a follow-up visit will be performed. If the follow-up visit still reveals inconsistencies, NHD will require that an independent QCI be hired by the Sub-grantee to do this task, or DOE funds will be re-allocated to another Sub-grantee.

NHD monitoring will be performed by the State Compliance Auditor/Inspector who must be QCI certified prior to undertaking any DOE inspections. In the event that he is not QCI certified, NHD will contract with a QCI-certified third party. NHD has a full-time permanent Compliance Auditor/Inspector position but he is not QCI certified. The position is paid out of the Training and Technical Assistance budget (*please see the attached budget for the percentage of salary and fringe benefits*). NHD utilizes a Weatherization Inspection Form (WIF) for all final inspections (attached). Presently, the Compliance/Auditor Inspector conducts an exit interview with the third party inspector (QCI) who provides a formal written summary of field findings. Corrective action on all fails is required with 100% reinspection required by the Sub-grantee field staff. From time to time NHD includes re-inspections of these fails when out in the course of their regular monitoring. Electronic photo or video evidence may be submitted to verify corrections have been made when appropriate. (*Please see attached Draft Subgrantee Contract for specific language addressing corrective action procedures.*)

For the current program year, field monitoring is ongoing. As stated above, the Weatherization Compliance Inspector is being conducted by a QCI-certified third-party agency, Home Energy Connection. Based on our current funding application, 207 units are estimated to be completed this program year. Therefore, a minimum of 10% or 21 units need to be inspected by NHD. As of June 30, 2022, a total of 137 inspections have been completed by our Inspector and the QCI third-party. The completed project inspections consist of 14 projects completed by the Community Services Agency (CSA), 73 projects completed by HELP of Southern Nevada (HELP), 31 projects completed by Nevada Rural Housing Authority (NRHA), and 19 projects completed by Rural Nevada Development Corporation (RNDC).

Through the course of the grant period, each Sub-grantee's financial status reports are continually reviewed to determine the actual program support, material, and health & safety costs of the homes being weatherized. These reviews are necessary to ensure compliance with the average cost per unit is not exceeded. Sub-grantee monthly expenditures are reported by budget category and reviewed by the Grants and Projects Analyst II and NHD accounting staff prior to

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reimbursement. The method of dealing with various problems which may arise between NHD and its Sub-grantees is dependent upon the severity of the problem. Normally, NHD staff will contact the Subgrantee's program manager and discuss the nature of the problem, determine how and by whom the problem will be resolved, and in what timeframe. If it is determined the problem could be corrected through more in-depth training or technical assistance, NHD will recommend this course of action and ensure that funds are appropriated to do so. Should the problem remain unresolved, the Weatherization Program Supervisor will contact the Sub-grantee explaining that failure to correct the problem could jeopardize future funding.

NHD has hired a new Weatherization Program Supervisor and a new Grants and Projects Analyst 2, and in-person monitoring has resumed starting in March 2022.

Our accounting staff has commenced the review of each of our Sub-grantee's most recent annual audits/financial statements. We hope to have this process completed by June 30, 2022.

V.8.4 Training and Technical Assistance Approach and Activities

Training and Technical Assistance (T&TA) Approach and Activities are included in the 2022 State of Nevada T&TA Plan attached to this application. This is the first year NHD has used this new template but the approach and many of the activities remain consistent with prior years.

Percent of overall trainings

Comprehensive Trainings:

Specific Trainings:

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:

Percent of budget allocated to Crew/Installer trainings:

Percent of budget allocated to Management/Financial trainings:

V.9 Energy Crisis and Disaster Plan

The State of Nevada does not intend to use DOE funds for Energy Crisis Relief.