

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0010021		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law	
3. Name and Address Virgin Island Energy Office #2 Estate Carlton Suite 3 Frederiksted, VI 008404474		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		\$ 1,658,204.00		\$ 1,658,204.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 1,658,204.00	\$ 0.00	\$ 1,658,204.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) PROGRAM OPERATIONS	(3) GRANTEE T&TA	(4) HEALTH AND SAFETY	
a. Personnel	\$ 80,000.00	\$ 60,000.00	\$ 20,000.00	\$ 16,000.00	\$ 176,000.00
b. Fringe Benefits	\$ 44,365.00	\$ 40,250.00	\$ 15,250.00	\$ 9,620.00	\$ 109,485.00
c. Travel	\$ 0.00	\$ 29,600.00	\$ 41,400.00	\$ 0.00	\$ 71,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 712,689.00	\$ 0.00	\$ 96,100.00	\$ 808,789.00
f. Contract	\$ 0.00	\$ 250,000.00	\$ 0.00	\$ 150,000.00	\$ 400,000.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 34,000.00	\$ 30,930.00	\$ 28,000.00	\$ 92,930.00
i. Total Direct Charges	\$ 124,365.00	\$ 1,126,539.00	\$ 107,580.00	\$ 299,720.00	\$ 1,658,204.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 124,365.00	\$ 1,126,539.00	\$ 107,580.00	\$ 299,720.00	\$ 1,658,204.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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**IV.1 Subgrantees**

Subgrantee (City)	Planned Funds/Units
Executive Office Of The Government Of The US Virgin Islands (St. Croix)	\$713,129.00 166
Virgin Islands Energy Office (St. Thomas)	\$713,130.00 167
<b>Total:</b>	<b>\$1,426,259.00</b> <b>333</b>

**IV.2 WAP Production Schedule**

Weatherization Plans	Units
Total Units (excluding reweatherized)	333
Reweatherized Units	0
Average Unit Costs, Units subject to DOE Project Rules	
<b>VEHICLE &amp; EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)</b>	
A Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B Total Units Weatherized	333
C Total Units Reweatherized	0
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	333
E Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
<b>AVERAGE COST PER DWELLING UNIT (DOE RULES)</b>	
F Total Funds for Program Operations	\$1,126,539.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	333
H Average Program Operations Costs per Unit (F divided by G)	\$3,383.00
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J Total Average Cost per Dwelling (H plus I)	\$3,383.00

**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	333	29.3	9757
	Prior Year Estimate	70	29.3	2051
	Prior Year Actual	0	29.3	0
<b>Method used to calculate savings description:</b>				
150 x 29.3 MBtu = 4395 MBtu				

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

The VIEO will not be leveraging any funds; leveraging is not applicable to the U.S. Virgin Islands at this time.

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**IV.5 Policy Advisory Council Members**

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

Cassandra Dunn	Type of organization: Other Contact Name: Phone: 3406266690 Email: <a href="mailto:cdunn@wswcommunications.com">cdunn@wswcommunications.com</a>
Denyce Singleton	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 3402274516 Email: <a href="mailto:denycesingleton@gmail.com">denycesingleton@gmail.com</a>
Karen Hunt	Type of organization: For-profit or Corporate (not a financial institution or utility) Contact Name: Phone: 3407138083 Email: <a href="mailto:khunt@vipistx.org">khunt@vipistx.org</a>

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

Date Held	Newspapers that publicized the hearings and the dates the notice ran
08/22/2023	The PAC met with the VIEO Deputy Director and Grants Program Coordinator on 5/22/2023. Meeting Notes are attached to the SF424.
09/19/2023	The VIEO Deputy Director and Grants Program Coordinator hosted the WAP BIL Public Hearing on 9/19/2023 at 1:00 PM (AST). The hearing transcript is attached to the SF424. The invoice from the Daily News local paper is also attached to the SF424.

**IV.7 Miscellaneous**

<b>Virgin Islands Energy Office</b>	
<b>#2 Estate Carlton Suite #3</b>	
<b>Frederiksted, VI 00840</b>	
<b>(340) 713-8436</b>	
Grantee Business Contact:	Kyle D. Fleming Director <a href="mailto:kyle.fleming@eo.vo.gov">kyle.fleming@eo.vo.gov</a> (340) 713-8436 ext. 3605
Grantee Principal Investigator:	Michael Jaffurs Deputy Director <a href="mailto:michael.jaffurs@eo.vi.gov">michael.jaffurs@eo.vi.gov</a> (340) 713-8436 ext. 3606
Grantee Program Coordinator:	Alanna Brenneman Grants Program Coordinator <a href="mailto:alanna.brenneman@eo.vi.gov">alanna.brenneman@eo.vi.gov</a> (340) 713-8436 ext. 3616
Grantee Fiscal Officer:	Magdalen Lawrence

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Fiscal & Budget Manager

magdalen.lawrence@eo.vi.gov

(340) 713-8436 ext. 3611

The Virgin Islands will use the Poverty Guidelines for Hawaii which has been updated for 2023:  
Poverty Guidelines | ASPE (hhs.gov)

Household Size	Threshold	Income Threshold
1	\$16,770	\$33,540
2	\$22,680	\$45,360
3	\$28,590	\$57,180
4	\$34,500	\$69,000
5	\$40,410	\$80,820
6	\$46,320	\$92,640
7	\$52,230	\$104,460
8	\$58,140	\$116,280

VIEO WAP work on multifamily buildings with no fewer than 5 units will pay wages at rates in accordance with Davis Bacon prevailing wage requirements to all laborers and mechanics engaged in the construction, alteration, or repair of those multifamily buildings. VIEO WAP will ensure with all contractors the wages are being met and have record on file for all applicable projects/ dwellings.

VIEO will comply with Buy American rules for all iron, steel, manufactured products, and construction materials used with WAP BIL funding to ensure these supplies are manufactured domestically.

VIEO does not plan to include any fuel switching with WAP BIL funds.

VIEO WAP does not have any special projects planned with WAP BIL funding.

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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 poverty guidelines serve as eligibility criteria for Medicaid and several other Federal programs. These guidelines are a simplified version of the poverty threshold Bureau to estimate the number of individuals and families living in poverty. In the Virgin Islands, we do not have our own data with the U.S. Department of Health and (HHS). Instead, we use Hawaii's most recent Poverty Guidelines to determine eligibility for VIEO WAP. For more information, you can visit [this link](#).

Here are the current Poverty Guidelines for various household sizes:

Household Size	Threshold	Income Threshold	Per Person addition
1	\$16,770	\$33,540	\$5,910
2	\$22,680	\$45,360	\$5,910
3	\$28,590	\$57,180	\$5,910
4	\$34,500	\$69,000	\$5,910
5	\$40,410	\$80,820	\$5,910
6	\$46,320	\$92,640	\$5,910
7	\$52,230	\$104,460	\$5,910
8	\$58,140	\$116,280	\$5,910

For families with more than 8 persons, 100% of poverty level increases \$5,910 for each additional person.

In the Virgin Islands, the Weatherization Assistance Program (WAP) is designed to assist families with children, the elderly, the disabled, and those with low income burden. Eligibility for WAP is determined based on household income at or below 200% of the poverty level.

The Virgin Islands has established and implemented specific procedures to ensure that no dwelling unit is reported as completed until the VIEO WAP has conducted This certification includes confirming that measures have been inspected and installed professionally and that the work complies with territorial and federal regulations plan.

Here are some key definitions:

- Low-income: Anyone meeting income eligibility based on 200% of the current federal poverty guidelines for Hawaii.
- Income: Cash receipts earned and/or received by the applicant before taxes during the applicable tax year(s) but not including income exclusions.
- Income Exclusions: Certain cash receipts are not considered sources of income for determining applicant eligibility.

Child support payments, whether received or paid, are not considered sources of income for determining eligibility.

Income can be annualized if the applicant received income for only part of the applicable tax year. The method of annualizing income should be determined by the G uniformly.

Recertification of eligibility must occur at least every 12 months.

Please note the VIEO considers children aged 5 or younger.

Describe what household eligibility basis will be used in the Program

**Household Verification** – Collects personal identifying information about the applicant.

This section must be completed by the head of household and/or owner/renter of the unit to be weatherized. The head of household is considered the applicant and r pertinent personal information.

**Proof of Ownership/Occupancy** – Verification that the applicant either owns or rents the dwelling (deed, lease

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agreement, rent receipt, mortgage payment, etc.)

**Gross Monthly Income** – Records income for all household members. The total gross monthly income of the household is used to determine eligibility in the program income guidelines in Section I, Appendix I.

Applicant must provide verification of income issued by the employer or any source for the past six months. Applicant must also provide verification for everyone in years and older who received income from any source.

The amount to be recorded is the gross, not net, amount. See Section I, Acceptable Income Documentation for acceptable documentation of income.

**Household Occupant Information** – this section lists all occupants of the household, including the applicant. This information is used to document and track the makeup of the household participating in the WAP, and the information collected in the questionnaire is used to document the makeup of the types of units being weatherized.

List all household members, beginning with the applicant (head of household).

Household Verification – Verification of all additional household members' occupancy (ex. guardianship papers, tax returns, pay stubs, photo ID with address, etc.)

**VIEO WAP Liability Release** – this section requests permission to use any information collected in the media and releases the VIEO WAP of any liability. This section also requests permission to request information and directs WAPA to make records available to obtain data to evaluate energy usage and the effectiveness of the program.

Explain the liability release to applicant before signing. Applicant must sign this release.

**VIEO WAP Disclaimer** – this section requires applicants to acknowledge that providing false statements or misrepresentation in their application is a federal offense and may be fined or imprisoned. VIEO reserves the right to stop the program in a dwelling if there's a discrepancy on the application and actual household occupancy.

**Privacy Act and Acknowledgement** – every applicant for WAP services must be provided with a copy of the Personal Privacy Protection Law Provisions. Federal agencies that collect confidential information affecting their eligibility be advised of their rights under the Personal Privacy Protection Law Provisions. All information collected is confidential by the agency, its employees, and its representatives. Explain the Privacy Act to applicant. Leave a copy of the Privacy Act with the applicant. Every applicant for WAP service must be provided with a copy of the Personal Privacy Protection Law Provisions. Applicants should be asked if they understand the Personal Privacy Protection Law Provisions before they sign the application. A copy of the Privacy Act must be given to the applicant, who must sign to acknowledge receipt.

– **WAPA Release of Information** this section collects information regarding the servicing of the building/unit's utility service. It also identifies the utility that supplies the electric service provider to release information on the recipient's bills, past and future, to the VIEO WAP. This information is necessary for VI WAP to allow for a reduction in electric service expenditures resulting from providing WAP services. This information is also required for any post electric service consumption analysis. This form must be completed by the owner/renter of the unit to be weatherized. This form must be signed by the person named on the electric service bill for that dwelling unit. This allows the electric service provider to release information on the recipient's bills, past and future, to the VIEO WAP.

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

To ensure qualified aliens, an important step is to verify nationality and if the individuals are permanent resident aliens. After verification of qualified alien status, the program eligibility criteria will be the same established in this section for income and household. The procedure for proof of nationality is the following: Individuals receiving weatherization benefits shall be U.S. Citizens or qualified aliens. The weatherization application requests the applicant to attest to their citizenship or alien status under penalty of law. However, applicants will be required to provide one of the following forms of evidence:

Citizens

- o Birth Certificate
- o Passport
- o Social Security Card (original) with copy

Permanent Resident Aliens

- o Permanent Resident Card (Green Card / INS Form I551)

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o Social Security Card (original) with copy

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

Procedures to determine that units weatherized have eligibility documentation

A dwelling unit shall be eligible for VIEO WAP after documenting that priority is given to identify and provide weatherization assistance to elderly persons, persons v families with children, high residential energy users and households with a high energy burden.

Rental units will require written permission from the building owner or his representative before commencing work. Low-income tenants residing in such unit will be t of the weatherization services. The household will not be subjected to rent increases as a direct result of the weatherization work completed. No excessive enhancer value of the dwelling unit.

1. Proof of Ownership/Occupancy – Verification that the applicant either owns or rents the dwelling (deed, lease agreement, rent receipt, mortgage payment, etc.)  
2. Household Verification – Verification of all additional household members’ occupancy (ex. guardianship papers, tax returns, pay stubs, photo ID with address, et Added as attachment "Client Application Fillable Template."

Describe Reweatherization compliance

VIEO WAP is not eligible to reweatherize any homes based on WAP Memo 075 new requirements.

Describe what structures are eligible for weatherization

The VIEO has WAP intake, client selection procedures, and unit energy audit procedures to determine the eligibility of the clients and the dwelling units. First, staff f how to administer an intake form, which gathers information on family data, annual income, and client needs. An assessment of the dwelling unit will be conducted to unit meets the criteria for WAP weatherization services. VIEO WAP team will ascertain whether the energy consumption levels at the dwelling unit appear to be exc to remediation by installation of standard WAP remediation installations, such as solar hot water heaters and/or energy efficient refrigerators. Then an Administrative the intake form and determine household eligibility within program guidelines. After a client’s eligibility has been certified, the client will remain eligible for weatherizat twelve months from date of application. Applicants who are on the waiting list are subject to the WPN 213 requirement that eligibility documentation be updated at l

Eligible buildings must comply with 10 CFR §440.22, such that not less than 66 percent of the dwelling units in the building are income eligible or will become eligibl dwelling unit may be weatherized without verification of income eligibility from either VIPHA, the property owner, or the household.

Eligible Dwelling Units:

1. Single Family: occupied by a family unit whose total income is at or below the level determined in accordance with the criteria established by the Director of the O Which contains at least one (1) member who has received cash assistance payments under the following Social Security Act Titles and/or State or Local Laws at 12month period preceding the determination of eligibility for weatherization assistance Social Security Act Title IV (TANF)

2. Multifamily Units: For a building to be considered a Multifamily unit for the purposes of WAP, it:

Shall contain more than one rented dwelling unit.

Shall be owned by a single owner, business entity, or government agency that rents out all the units in the building.

Includes duplexes/townhouses, row houses, walkup and apartment buildings.

Describe how Rental Units/Multifamily Buildings will be addressed

**Rental Procedures**

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No leased/rented dwelling shall be weatherized without first obtaining the written permission of the owner of the dwelling unit or the agent. The benefits of weatherization accrue primarily to the low-income tenants. Rents shall not be raised because of the weatherization assistance provided by this grant; and no undue or excessive enhancement to the value of the dwelling units. Signed statements will be obtained from the owners or their agents certifying that rents will not be raised because of work done because of weatherization assistance.

The VIEO has established policy to ensure financial eligibility is determined and written permission of the owner or his agent is obtained. In multiple unit buildings, that 66 percent of the building (50 percent in the case of duplexes or quadruplexes) are eligible units. The policy also ensures that the benefits of weatherization accrue to the tenant, including units where the tenants pay for their energy through their rent.

VIEO WAP policy for rental units will state that the landlord must agree in writing that for a reasonable period of time, not less than 12 months, the tenant will not be charged for increases unless those increases can be demonstrated to be related matter and conditions other than the weatherization measures performed. State policy also provides for a complaint in such matters. Tenants and landlords are informed in writing that no undue or excessive enhancement shall be provided to the rental unit or building by weatherization assistance.

Describe the deferral Process

**Reasons for Ineligibility**

There are some situations when weatherization services may need to be deferred until other agency and/or dwellings can resolve the problem of an eligible dwelling unit. The dwelling should be safe for crews and occupants. The following are reasons a VIEO WAP application may be deferred:

**Some of the more common situation includes:**

1. The client has known health conditions that prohibit the installation of any equipment and other weatherization measures.
2. The dwelling structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent, and the conditions are cost-ineffective.
3. The house has sewage or other sanitary problems, such as animal feces, that would further endanger the client and weatherization staff.
4. Extensive moisture/ mildew problems are severe and cannot be resolved under existing health and safety measures and with minor repairs.
5. The client is hostile, uncooperative, abusive, or threatening to the program staff and/ or contractors, auditors, or crew that must work on or visit the dwelling
6. The extent and condition of lead-based paint in the house would potentially create further health and safety hazards,
7. Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers,
8. Major remodeling is in progress, which limits the proper completion of major weatherization measures.
9. Illegal activities are being conducted in the dwelling unit.
10. Unrestrained aggressive pets that can threaten the safety of the weatherization staff.

**Notice of Ineligibility**

Applicants must receive written notification of their eligibility status within 30 days after a completed application has been submitted to the VIEO WAP Intake Agency. Notice of Ineligibility must include the reason(s) for denial of WAP services. A copy of the applicant's Notice of Ineligibility must be sent to the intake agency representing the applicant's files. In multifamily buildings where a notification is posted, one copy should be in the building file.

**Appeals of Ineligibility**

When VIEO WAP determines that a household is ineligible, a written denial must be provided to the client. A copy of the denial letter with the appeal procedure that the client must be placed in the client's file.

The appeals process for ineligibility determination is as follows:



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1. Applicant will notify VIEO WAP, in writing, of intent and reason(s) for appeal.
2. VIEO WAP Admin Assistant will submit applicant's file an appeal letter to the VIEO WAP grants program coordinator.
3. The WAP Grants Program Coordinator will review the file and make a recommendation to the VI Energy Office Director.
4. The VI Energy Office Director will make a final decision on the eligibility status and a letter will be sent notifying the client in writing of the eligibility determinat

**Grievance Procedure**

1. VIEO has the responsibility to resolve all client complaints, including applicant denials, project deferrals, and work quality issues.
  1. A grievance must be filed in writing for VIEO to act.
  2. VIEO's process must include the following client rights:
    - (1) have a representative speak on behalf of the client – including an interpreter if needed.
    - (2) review and obtain copies of the client's file
    - (3) present oral and written statements
    - (4) call witnesses and to question or cross-examine witnesses
  - c. The client must be informed of a decision to the resolution process within ten (10) working days of complaint receipt.
2. VIEO will inform all clients of their right to file a grievance in their notice of ineligibility.
3. Clients may withdraw a grievance at any time with the understanding that they may re-enter the process at the point they withdrew if a complaint is not resolved.
4. VIEO must:
  - a. document each step of a grievance proceeding, including communication with the client.
  - b. inform client and IAR of final resolution if compliant or grievance is settled quickly.
    - c. Provide IAR of all applicable complaint and grievance documentation of the case.
  - d. Provide a formal ruling on each case within 30 days of receipt of case documentation.

**Deferral Client Referrals**

VIEO WAP will inform all clients who are deferred to check with their respective local office for other programs they may qualify for and also be given a copy of the Home Energy Savings through self-audit (handout in progress for WAP and all clientele).

**V.1.3 Definition of Children**

Definition of children (below age): 5

**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.

At present no Native American tribes are registered the Virgin Islands. However, the Virgin Islands Weatherization Assistance Program does not discriminate against any low-income clients no matter what their ethnic origin.

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

The VIEO WAP BIL service area will include targeted population on all three (3) main United States Virgin Islands: St. Thomas, St. John, and St. Croix.

**V.3 Priorities**

Applicants' information shall be kept on file with any priorities given to certain portions of the eligible population receiving weatherization assistance. Specifically, as (b), briefly describe procedures to ensure that priority is given to the elderly and persons with disabilities.

**Priorities**

In identifying and providing WAP, VIEO priority is given to elderly and disabled low-income persons, families with small children, and other high energy consuming c according to the following standard territory wide prioritization procedures. Priority points shall be awarded initially at the time the application is received. Total poss applicant can receive 40 points. The clients selected for service are based on the applications with the highest number of priority points. Those dwellings are weather However, anytime the program deviates from the usual procedure of selecting dwellings to be weatherized, a written explanation for the decision should be documen folder.

These procedures are based upon a Priority Point System in which points are assigned as follows:

**PRIORITY POINT SYSTEM**

1. Household with disabled person - 10 points
2. Household with elderly person (60 or over) - 10 points
3. Household with children under 5 years of age - 10 points
4. High energy burden (20% or more of the household income is going towards the energy bill) - 5 points
5. High utility bill using more than 500 KWH a month or more than \$200.00 a month - 5 points

**V.4 Climatic Conditions**

The climate of the US Virgin Islands falls into the tropical climatic zone. Temperatures are moderate year-round, with a range from 72 °F to 83 °F. The humidity runs around 80%. The island is vulnerable to hurricanes, between the months of July through November.

The following data was accessed from the Southeast Regional Climate Center (SERCC) reviewing trends from 1991 - 2020 and is still relevant in 2023. (<https://statesummaries.ncics.org/chapter/pr/>)

Temperatures in the U.S. Virgin Islands have risen almost 2°F since 1950.

Under a higher emissions pathway, historically unprecedented warming is projected during this century, including increases in extreme heat events.

Future changes in total precipitation are uncertain, but extreme precipitation is projected to increase, with associated increases in the intensity and frequency of flooding.

Since 1961, sea level has risen by 0.7 inches per decade at San Juan, Puerto Rico which is located just 100 miles away—a rate equal to the global sea level rise rate half of the 20th century. Global sea level is projected to rise another 1–8 feet, and similar rises are projected for the U.S. Virgin Islands. Rising sea levels pose wide threats to both natural and built environments in coastal communities.

Hurricanes are a major threat to the U.S. Virgin Islands. Hurricane rainfall rates, storm surge heights due to sea level rise, and the number of the strongest (Category hurricanes are all projected to increase in a warming climate. The US Virgin Islands are vulnerable to hurricanes, between the months of July through November.

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

**V.5.1 Technical Guides and Materials**

The purpose of Virgin Islands Energy Office (VIEO) Weatherization Assistance Program (WAP) is to install energy conservation measures in the homes of income especially homes occupied by the elderly, persons with disabilities, and children. Funds are targeted to the most cost-effective conservation measures, determined from an energy audit of a dwelling. The program is intended to reduce national energy consumption and to reduce the impact of higher energy costs on low-income families.

The program is administered by the VIEO which will provide energy conservation services through their own trained personnel and by contracting work to local contractors. Contractors will be selected via a competitive Request for Quotes. Energy conservation measures funded through the program range from replacing old, inefficient refrigerators with Energy Star refrigerators, replacing existing incandescent bulbs with LEDs, installing low flow shower heads, installing faucet aerators, timers on ceiling fans, installing motion sensor power strips, replacement of air conditioning units, Energy Star ceiling fans and water heaters. The program assists all types of housing units, from single-family homes to multifamily apartment buildings.

Technical guides and VIEO WAP materials are distributed to the client, VIEO WAP employees and contractors.

All work is being performed in accordance with the DOE approved energy audit procedures and 10 CFR 440 Appendix A. Please Refer to the SF424 for the DOE Field Guide and Priority List; these documents were approved on 8/08/2023.

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: Priority List
Approval Date:

Audit Procedure: Manufactured Housing
Audit Name:
Approval Date:

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

Comments

VIEO WAP Energy Audits will be in accordance with applicable DOE rules and regulations.
Please see the VIEO WAP Audit Inspection Form attached to the SF424 along with the current Priority List and Field Guides.
Multifamily Unit Guidance - If reported multifamily units comprise less than 20% of total units, individual multifamily projects must be submitted to and approved by project commencing.

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### V.5.3 Final Inspection

Each dwelling unit (100% of jobs weatherized or where base load measures were installed) that is being reported as complete for the purpose of obtaining DOE funds must file an inspection form signed by a representative designated by VI WAP. The inspection form must have information that indicates that all measures designated for installation are installed in a workmanlike manner. The signed inspection form certifies that measures installed should under reasonable conditions save energy and make the dwelling more comfortable for the inhabitants. If a designated measure is not installed, then a written explanation must be included in the file and noted on the inspection form.

Note: A DOE Weatherized unit is a dwelling unit on which a DOE approved energy audit or priority list has been applied. As funds allow, the DOE measures installed must have a SIR of 1.0 or greater, but also may include any necessary energy related health and safety measures. Therefore, a dwelling unit that meets both the definition of a DCU and has DOE funds used directly on it must be counted as a DOE completed unit.

Individuals performing the WAP Final Inspection and installed work will be members of the VIEO staff to include Audit Inspectors on staff, who are instrumental from the beginning of the process with application review and initial audit.

The WAP Final Inspection Report Form governs final inspection checklists and processes and outlines actions for inadequate inspection processes.

If the applicant dwelling is deferred/ referred the information is logged in Smartsheet's (our current software to track all WAP clients and progress).

Please see the WAP Final Inspection & Report FY 23 attached to the SF424.

### V.6 Weatherization Analysis of Effectiveness

To effectively calculate the most accurate energy savings for the VI WAP, it will track energy usage information from occupants of the dwellings weatherized. The energy records will cover the period twelve (12) months prior to and twelve (12) months after weatherization. The usage information will be used to compare pre-weatherization energy savings as well as assist in determining training and technical assistance deficiency and subsequent needs.

The Virgin Islands WAP has begun and will continue to develop policy for evaluating program effectiveness as follows:

#### **Program Administration**

- ; Complete program implementation oversight
- ; Maintaining program files and accuracy
- ; Timely completion and submission of reports
- ; Work quality and oversight
- ; Monitoring reports
- ; Timely submission of all required reports
- ; Provide accurate budget oversight

#### **Performance Analysis**

- ; Income eligibility.
- ; Number of Elderly, Disabled, Children, High Energy User, and Households with High Energy Burden served.
- ; Expenditures versus number of dwellings weatherized. Production quotas and expenditures.
- ; Refrigerator testing, and water heating testing
- ; Client education.
- ; Health and safety.
- ; Referrals from ECAP and other nonprofits.
- ; Proper use of Priority Measures/Weatherization measures selected.
- ; Final inspection/Reinspection's and follow-up.
- ; Personnel training and client education.
- ; Program files and accuracy and timely completion/submission of reports.
- ; Work quality and oversight.
- ; Monitoring reports.

VIEO continuously looks for methods, tools, and ways to improve WAP analysis and effectiveness.

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**V.7 Health and Safety**

Budgeting: Health & Safety Budget

Health and Safety Expenditure Limits (Provide a per-unit average percentage and justification relative to the amount. Low percentages should include a statement of being used to support health and safety costs, while larger percentages will require greater justification and relevant historical support.):

Per-Unit Average Percent: 1%

Typical efficiency measures are base load only. 100% of homes have no central air or heating systems and rely totally on natural ventilation. Therefore, there is no air pressure diagnostics performed. With very limited WAP funding available, grantee would like to limit H&S items to only those absolutely necessary to safely complete the past few years has indicated that only a minimal amount of H&S would apply to this housing stock and weatherization measures being provided.

Deferral Policy (Provide a detailed narrative of the grantees overall deferral policy):

Agency shall utilize the Weatherization Deferral/Referral Notice to provide written notice to clients in dwellings where problems exist that are outside the scope of WAP. The client will be given 30 days as stated on the Deferral Notice to take corrective action. If the client is able to take corrective action within 30 days, work should resume as soon as the Agency receives notification from the client. If problems identified in the Deferral Notice are not corrected within 30 days, the subgrantee places the job in an inactive status until the problems noted on the Deferral Notice have been corrected.

Deferral conditions may include:

Building structure or its electrical system is in a state of disrepair and failure is imminent.

Extensive moisture/mildew is severe and cannot be resolved under the existing health and safety measures.

Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.

Major remodeling is in progress, which limits the proper completion of major weatherization measures.

Occupant has known health problems that prohibit the installation of weatherization materials.

The client is hostile, uncooperative, abusive, threatening to the auditors, crews or staff that must work or visit the dwelling.

The extent of the lead-based paint in the dwelling would potentially create further health and safety hazards.

The presence of sewage or animal feces in the home will endanger the workers/crews and client if the weatherization work is performed.

There is not adequate interior space to install hot water tank and exterior location is exposed to the elements. Cost of constructing an exterior shelter is beyond the scope of the program.

Other:

Procedure for Identifying Occupant Health Concerns:

At the time of application, the client must complete a "Client Health Survey", identifying potential health issues of the applicant and all occupants of the dwelling. This survey is inserted into the client file for future reference. The energy auditor will review the survey with the client at the time of the initial on-site assessment and verify that information is accurate. The information collected during this process will be used to aid in determining the best material and course of action for the weatherization process. When the client is fragile and/or work activities would constitute a health or safety hazard, the occupant(s) at risk will be required to leave the home during work activities. Weatherization work is used to relocate clients. If the client is unable to leave the home and the intended work may exacerbate an occupant's health condition, the home may need to be deferred.

A "Weatherization Deferral/Referral Notice" will be developed for use in the program. This form will include client's name, address, date of audit/assessment, clear and concise description of health and safety issues, when and under what conditions weatherization work could continue, client's signature and date they were informed indicating they were informed of the issues. A "Client Health Survey" will also be developed as part of the application package to identify any existing health concerns which could be affected by weatherization work.

Air Conditioning and Heating Systems

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There will be no heating system replacement, repair, or installation with DOE funds as there are no heating systems in grantee's territory.

Central air conditioning systems will not be addressed as the climate does not warrant the need for central A/C. Room air conditioner replacements/repair or installation attempted through cost justification on the priority list before using H & S funding. If this is not possible, air conditioner installation will be allowed in homes of the at-risk defined as an occupant who has a documented medical need to have conditioned air.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds will be used for the above activity.

If the measure is beyond the scope of DOE WAP, the client will be notified by the "Weatherization Deferral/Referral" form.

WAP crews will test any existing room air conditioner to determine if it is operable. If it is not and the client meets the at-risk criteria, a replacement room A/C unit of the priority list will be installed.

When serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor shall notify the owner and defer the proposed installation measures in the unit until such hazards are remedied.

If repair/replacement is beyond the project scope of DOE either for efficiency or health and safety reasons, the client will be notified in writing by the "Weatherization Deferral/Referral" form, and if possible referred to local agencies that could assist.

Training will not be needed, as room air conditioner repair/replacement will be performed by a General Contractor or Vendor. WAP auditor/inspector would verify that the unit is complete and adequately installed with no problems.

Auditor/inspector will provide client education on appropriate operation and maintenance of A/C units. An operations manual and any warranty information will be provided to the client.

Replaced units will be disposed of according to the environmental standards in the Clean Air Act 1990, Section 608, as implemented by 40 CFR 82 (7/1/2006). Units will be disposed of by an EPA-approved section 608 type I or universal certified contractor/vendor, and so noted in the file. Disposed units will be recycled when possible.

Room A/C units will be installed as specified in the grantee priority list and installation standards. Room A/C units that cannot be repaired/replaced through the priority list for H & S, will be justified by being located in Climate Zone 1 and identifying at-risk occupants as defined by documented medical reasons for need.

#### Appliances and Water Heaters

Replacement of water heaters for health and safety is allowed on a case by case basis. Replacement of water heaters with solar or hybrid heat pump water heaters will be allowed through the priority list. Replacement and installation of other not related appliances are not allowed.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE WAP funds may be used for the above activity.

If the measure is beyond the scope of DOE WAP, the client will be notified by the "Weatherization Deferral/Referral" form.

Hot water tanks that are leaking water, producing high carbon monoxide or drafting poorly will be assessed for repair or replacement. Combustion safety testing will be performed on gas-fired water tanks. If repair is not possible, tank can be replaced. All plumbing work is performed by licensed contractors and must comply with local codes. Local agencies will confirm installation and that unit is working properly.

If serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor shall notify the owner and document in the client's file. If safety is present, the client's home shall be deferred to resolve such major problems prior to any weatherization work.

If repair/replacement is beyond the project scope, agency will make every attempt to refer client to other local agencies who may be able to assist.

Water heater repair/replacement will be performed by a licensed plumber. Agency inspector will be trained to determine if installation is adequate (hooked up, produced hot water).

Clients are provided with operating instructions, operating manual, and warranty from the manufacturer.

Disposal of appliances shall be according to the environmental standards in the Clean Air Act 1990, Section 608, as implemented by 40 CFR 82 (7/1/2006). Disposed units will be recycled when possible.

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Asbestos - in siding, walls, ceilings, etc.

Any surfaces to be altered in the weatherization process shall be inspected for asbestos prior to alteration. Crews and contractors must work around any asbestos-containing materials. Testing or abatement of asbestos is not an allowable H&S expense.

DOE funds will not be used for asbestos testing or removal.

If asbestos is present in any area which will be disturbed during weatherization, the asbestos must be remediated prior to weatherization work using non-DOE funds.

All auditors must attend a formal asbestos awareness training to learn to identify asbestos-containing materials and when it may pose a hazard to clients or workers.

Work will be deferred if crews are unable to perform weatherization due to the presence of asbestos.

If possible, clients will be referred to other possible non-profit community agencies, referral services and private contractors who are licensed and have expertise to remove asbestos.

Agency auditors/assessors will be required to take an Asbestos Hazard Emergency Response Act (AHERA) course to be able to identify asbestos.

If asbestos is identified by crew, client shall be instructed not to disturb any suspected surface and given the EPA pamphlet "Asbestos in the Home, a Homeowners Guide to Asbestos."

No asbestos removal work will be performed.

Asbestos - in vermiculite

The presence of vermiculite in grantee territory is unlikely as we do not look into the attic. Grantee does not perform any insulation, air sealing, or blower door testing. However, auditor/assessors will be trained to recognize vermiculite and notify client of its presence.

DOE funding will not be used for testing or removal of vermiculite.

If vermiculite is discovered, the client will be notified and instructed not to disturb the material.

No weatherization work will occur which could possibly disturb vermiculite.

If vermiculite is present in a dwelling and weatherization work would disturb it, the unit would be deferred until the vermiculite is removed.

If possible, client will be referred to local agencies if vermiculite is present.

Agency auditors/assessors will be required to take an AHERA course to be able to identify asbestos in vermiculite.

Clients will be notified of potential hazard and provided with the EPA pamphlet on asbestos in the home.

There will be no removal or disposal of vermiculite allowed.

Asbestos - on pipes, furnaces, other small covered surfaces

There are no furnaces in grantee territory. There is nothing to assess.

No DOE funds will be used for this H&S measure.

This measure is not applicable to grantee territory.

Not applicable. This measure will not be done.

Not applicable, nothing to defer.

Not applicable, nothing to refer.

Not applicable. Assessor/auditors will have AHERA training to identify any potential asbestos.

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Since there are no furnaces, it is unlikely that there will be asbestos covering on any pipes. However, if it is identified, client will be notified of asbestos hazard.

Grantee will not be removing or disposing of any asbestos.

Biologicals and Unsanitary Conditions - odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.

Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowable. Addressing bacteria and viruses is not an allowable activity. Remediation may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

DOE funds may be used to remediate conditions that may lead to or promote biological concerns or unsanitary conditions. This would typically be a plumbing leak under a home.

Client will be asked to correct problem or will be deferred to other agencies who may be able to assist.

Minor plumbing leaks or drainage problems could be remedied with DOE funds.

Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

Client will be referred to local health and social service agencies who can assist in resolving the issues.

Training for sensory recognition of moisture problems is part of the DOE Mold Awareness training. All auditors/assessors will be required to take basic mold/moisture training.

In homes where mold and moisture has been identified as a problem, clients will be given a copy of "A Brief Guide to Mold, Moisture and Your Home" and given an opportunity to correct conditions that cause deferral.

Disposal of all moisture damaged materials must be in accordance with DOE mold guidance.

#### Building Structure and Roofing

Building structure and major roofing repairs are not allowable. Minor roof repairs and construction of enclosures to protect and preserve DOE WAP installed hot water heaters are allowed, but this will be included in the installation cost of the measure and must meet the SIR.

Building structure and major roofing repairs are not allowable with DOE funds.

If the repairs and installation cost cannot meet the SIR for the weatherization measure, the unit will be deferred.

There is no remedy. Unit will be deferred.

If dwelling requires structural or roofing repairs, weatherization will be deferred until that work is complete.

Client will be referred to local agencies if repair/replacement is beyond the project scope.

Auditor/assessors will be trained to identify if building structure and roofing is not safe.

Client will be notified that structure is unsafe and referred to housing repair agencies if known.

There will be no removal or disposal of structural or roofing materials.

#### Code Compliance

Local building code requirements must be followed at all times. This is particularly important when installing solar hot water systems and hybrid hot water heat pump systems. Pre-existing code violations in a dwelling is not allowed unless the code corrective action is required due to the installation of a weatherization measure.

DOE funds will be used to comply with local codes in the installation of weatherization materials.

Weatherization work should be deferred if the property has been condemned or red tagged for any code violations which cannot be corrected under this guidance.

Work must meet current applicable code requirements. Work will include obtaining permits and inspection from the local building departments when required.



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If the cost of meeting code compliance is excessive and beyond the allowable average cost for the efficiency measure according to the SIR, the property should be d alternative sources of funds are identified to correct the problems.

Client will be referred to other programs or agencies if necessary to bring structure up to code.

Grantee and subgrantees will become familiar with code requirements for installation of weatherization materials by meeting with local code officials. Field personnel encouraged to attend "building/construction code" instructional classes. The intent of training is not to learn all codes for all trades, but to be aware of codes in the ar weatherization auditors and crews/contractors commonly encounter. Domestic hot water installation is performed by contractors. Training for code compliance is the installation contractor.

Clients will be informed of changes to their homes as the result of code compliance. They will also be notified by the deferral/referral form if their home cannot be w meeting code compliance.

There are no disposal procedures for this element.

Combustion Gases

Combustion safety testing is required when combustion appliances are present. This will include gas water heaters, gas cook stoves, and any other gas appliance loc Appliances will be tested for carbon monoxide and gas leaks. If air sealing is done due to air conditioning or heating, natural draft appliances will be tested for draft a worst-case conditions before and after air sealing. This will be done before leaving the home on any day when work has been done that could affect draft (i.e. tighten exhaust).

Combustion appliances must vent to the outside. Correction of venting and gas line leaks is allowed when testing indicates a problem. If problems affecting the imme occupants are discovered, the client is immediately notified and the appliance disconnected.

Gas ovens will be tested for CO. Cooking burners will be inspected for operability, CO, and flame quality.

DOE funds may be used for combustion testing and venting if required. Correction of venting and gas line leaks is allowable. Repair and cleaning of cook stoves is a is not allowable.

If a combustion appliance cannot be repaired or replaced with DOE funds, it is beyond the scope of WAP and the job will be deferred until the situation is correcte

If problems are found during combustion gas testing, appliances may be repaired or replaced if allowable under DOE rules. Gas water heaters may be repaired or r possible. Cook stoves can be cleaned and repaired, but cannot be replaced with DOE funds. Gas dryers can be repaired, but not replaced. (see Appliance and Wa

Problems found with combustion appliances cannot be corrected with DOE funds and will be deferred.

Whenever possible, clients will be referred to local agencies if repair/replacement is beyond the project scope.

Agency staff and/or contractors shall be trained in CAS testing using proper instruments. Results of testing will be documented in the client files.

Clients with combustion appliances in the home will be provided information and explanation of combustion safety and hazards information, including the importance ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

No disposal is required for testing.

If a problem exists affecting the immediate safety of the occupant, the client is immediately notified, and if necessary, the appliance is disconnected.

Drainage - gutters, down spouts, extensions, flashing, sump pumps, landscape, etc.

Correction of minor drainage, gutters or downspouts to direct rain water away from the building is allowable if within the cost limitations. Installation of gutters, down flashing, sump pumps, landscape, is not an allowable cost.

DOE funds can be used to correct minor drainage problems.

Extensive installation of gutters, downspouts, sump pumps or landscaping is beyond the scope of WAP and not allowable.

Drainage problems beyond the cost limitation will not be corrected with DOE funds.

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If drainage problems beyond the scope of WAP will affect the operation of any weatherization measures, the work will be deferred until such problems are corrected.

Client will be notified of serious drainage problems that are creating health and safety issues or detrimental to installation of weatherization measures. The client will be notified of such problems prior to weatherization and/or referred to local agencies who may be able to assist.

Agency staff will be trained to visually identify any drainage problems.

Client will be notified of health and safety concerns regarding poor drainage and the effect this may have on any weatherization work.

Disposal of any material removed from the structure will be done in an environmentally acceptable manner.

**Electrical, other than Knob-and-Tube Wiring**

Minor electrical repairs are allowed where health and safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures. Typical repairs may be installing switch plate or outlet protectors, replace ceramic light bulb fixtures, or other means to eliminate exposed wiring. Repair or replacement of outlets for A/C, water heater, or refrigerators is also allowable. Upgrades and repairs for weatherization measures are allowable such as relocation of electrical outlets to be relocated for proper ventilation or proper connection of an existing water heater.

DOE funds will be used for minor electrical repairs associated with weatherization work.

Electrical work beyond minor repairs are beyond the scope of WAP.

Visual inspection will be performed. Crews will check for alterations that may create an electrical hazard. Voltage drop and voltage detection testing are allowed.

When serious electrical hazards, gross overloads, or electrical wiring exposure are present, the energy auditor(s) and crews shall notify the owner and document in the report. If the condition, the client shall be deferred to resolve such major problems prior to the installation of weatherization services, ensuring electrical base load is within the electrical code standards. Weatherization measures that effect electric load include air conditioner(s), refrigerator, and hot water tank replacement.

Client may be referred to other local agencies if repair/replacement is beyond the project scope.

Crews will be trained in basic electrical safety, how to identify electrical hazards, and local code compliance.

Installation contractors are responsible for proper electrical installation of appliances.

Clients will be provided with information and explanation of the hazards of overloading circuits, basic electrical safety/risks and over current protection (where applicable).

Any electrical materials removed from homes will be disposed of per EPA guidelines.

**Electrical, Knob-and-Tube Wiring**

Since no attic insulation will be installed in grantee's service territory, there will be no inspection for knob-and-tube wiring.

No DOE funds will be used. There will be no insulation placed over knob-and-tube wiring.

This is beyond the scope of the grantee's weatherization program.

No testing will be done, no attic insulation.

No work will be done in attics with knob-and-tube wiring.

If knob-and tube wiring is discovered, client will be referred to other programs as this is beyond the project scope.

No training will occur as no work will be performed in this area.

No client education will be done as no work will be performed in this area.

No disposal procedures are necessary as no work will be performed in this area.

**Fire Hazards**

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Current inspection criteria take into account fire hazards. These include combustion appliance venting systems and required clearances. Auditors also identify any flar to combustion appliances and existence of electrical circuit overloads.

DOE funds may be used for identification and correction of fire hazards when necessary to perform weatherization work.

Gross fire hazards that are beyond the scope of weatherization will require deferral of the job until hazards are corrected.

Fire hazards will be ameliorated or removed prior to weatherization work.

If the fire hazards are beyond the scope of WAP, the job will be deferred until the hazard has been remedied.

Client will be referred to other agencies/programs if repair/removal is beyond the project scope.

Auditors/crews will be trained in basic fire hazard safety.

Clients will be notified of any potential fire hazards in the home.

Any flammable material will be disposed of according to EPA guidelines.

Formaldehyde, Volatile Organic Compounds (VOCs), and other Air Pollutants

Air pollutants will be identified by auditor/assessors prior to any work on the job. Removal of pollutants is allowed and is required if they pose a risk to workers. Rer that are not necessary to perform weatherization work (old paint cans, oil in garages, etc.) is not allowed.

DOE funds may be used to remove pollutants that are of danger to weatherization workers.

Removal of pollutants not related to weatherization work is not allowable.

Dangerous air pollutants will be removed prior to any work.

If pollutants cannot be removed, the work will be deferred until the situation is remedied.

Client will be referred to other programs/agencies if pollutants are beyond the project this scope.

Weatherization auditor/assessors will be trained to recognize common household pollutants including formaldehyde, tobacco smoke, thinners, solvents, cleaners, and capable of negatively impacting indoor air quality.

Clients will be informed of observed conditions and associated risks. Client will be given written information and explanation on safety and proper disposal of househ

Pollutants will be disposed of following EPA procedures.

**Injury Prevention of Occupants and Weatherization**

Workers – Measures such as repairing stairs and replacing handrails.

Workers must take all reasonable precaution against performing work on homes that will subject workers or occupants to health and safety risks. Minor repairs and conducted only when necessary to effectively weatherize the home. Otherwise, these measures are not allowed.

DOE funds will not be used to make general home repairs.

This is beyond the scope of the DOE WAP and home repairs will not be made.

Stairs, handrails, and other general repairs will not be made with DOE funds.

If worksite is not safe, weatherization will be deferred until a safe work environment can be created by client.

Client will be referred to other local social service agencies if repair/replacement is beyond the project scope.

Assessors will be made aware of general hazards which could prevent weatherization.

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Client will be informed of dangerous and unsafe condition of the home.

No disposal, as no work will be performed in this area.

#### Lead Based Paint

Work that disturbs painted surfaces on pre-1978 housing must be in accordance with the EPA's Lead RRP requirements. All testing, job site set-up and clean-up must be performed by a Certified Renovator and each crew member must be accompanied by a Certified Renovator. (Currently only HCAP and MEO have received certification). Typical disturb lead paint in pre-1978 homes could include window or through wall Room Air Conditioners.

Solar or hybrid hot water system installed with through the wall penetrations will also follow LRRP and LSW. It is doubtful that the disturbance of paint will be affected by these measures, but if it will, the job will be deferred.

DOE funds will be used for lead paint testing, site set-up, clean-up, and verification on all pre-1978 homes.

If it appears that extensive amounts of lead paint will be disturbed by weatherization creating further health and safety hazards, the client will be notified that the job will be deferred.

Workers will follow EPA's RRP requirements and DOE protocols for lead safe weatherization (LSW).

Deferral is required when the condition of the lead based paint in the house is potentially a health and safety hazard.

Client will be referred to local lead abatement agencies if the condition of lead paint appears dangerous to health.

All workers must be trained in LSW and Certified Renovators must attend EPA training.

Where lead paint is present, clients must receive and acknowledge with signature, the most current EPA "Renovate Right" pamphlet.

Proper disposal of lead-paint debris must be in accordance with EPA LRRP protocols.

All weatherization staff must complete LSW training within 30 days of grant approval and 30 days from hire subsequently. The grantee maintains records of staff training.

#### Mold and Moisture

Grantee will not be correcting any mold and moisture problems. If these problems are encountered during assessment, home will be deferred until problems are resolved.

DOE funds will not be used to eliminate mold and moisture.

With limited grantee funds, this issue will not be treated.

Weatherization will be deferred if mold or moisture exists in home.

Water damaged homes shall be deferred

Client will be asked to resolve mold and moisture problems prior to weatherization work. If mold and moisture problems are severe, they may be referred to other local agencies for assistance.

All workers will receive Mold and Moisture training on how to recognize problems.

Clients shall receive "Mold Resources: <http://www.epa.gov/mold/moldresources.html> ; "A Brief Guide to Mold, Moisture and Your Home: U.S. Environmental Protection Agency Indoor Environments Division (IED). [www.epa.gov/](http://www.epa.gov/)

No disposal, as no work will be done on this item.

Suspected mold or severe moisture problems will be identified, using sight and smell, during the early stages of an assessment and a determination made of the severity of the problem. If problem is too severe to weatherize home, client will be notified and job deferred until problem is resolved.

#### Occupant Preexisting or Potential Health Conditions

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During application intake and home assessment, subgrantee will determine if a person's health may be at risk and/or the work activities could constitute a health or safety hazard. If an occupant at risk will be required to take appropriate action based on severity of risk. Temporary relocation of at-risk occupants may be allowed on a case by case basis. If an occupant is unable to take appropriate actions must result in a deferral.

No DOE funds will be spent on this item.

This is beyond the scope of DOE WAP and home will be deferred if weatherization cannot be done with risk of health and safety of occupants.

Occupants at-risk will be asked to leave home during weatherization or home will be deferred.

If at-risk occupants cannot be relocated during weatherization, the home shall be deferred.

Client may be referred to other social service agencies for assistance.

Training will be provided on how to assess occupant pre-existing conditions and determining course of action is required.

Client will be provided with information on any known risks to their health conditions.

No disposal, as no work will be done.

#### Occupational Safety and Health

##### Administration (OSHA) and Crew Safety

All workers must follow OSHA standards and Material Safety Data Sheets (MSDS) and take precautions to ensure the health and safety of themselves and other workers. Safety signs and labels will be posted wherever workers may be exposed to hazardous materials.

DOE funds will be used for OSHA training.

DOE funds will be used to provide 10-hour OSHA safety training to all on-site assessors/inspectors. The on-site staff performs initial assessment, install LEDs and perform final inspections. Since the grantee program is very small and only base load measures are installed. It is felt that the 30-hour OSHA course would not provide useful information for the type of work being conducted. Installation of solar hot water systems and hybrid heat pump water heater will be done by contractors. Roof refrigerators are delivered and installed by vendors. Old units are disposed of by vendors per EPA guidelines.

#### Pests

Pest removal will not be done under DOE WAP.

DOE funds will not be used for pest removal.

If the presence of pest interferes with weatherization, job will be deferred until pests are removed.

Infestations of pests may be cause for deferral where it poses a health and safety concern for workers.

Client may be referred to other local agencies if pest infestation is severe and client cannot correct problem themselves.

Training will be provided on how to assess presence and degree of infestation, associated risks, and deferral criteria.

Client will be provided with information on observed condition and associated risks and reasons for deferral.

No disposal, as no work will be done.

#### Radon

Since homes will not be sealed due to natural ventilation, there will be no testing for radon. Only base load measures will be installed which should not affect infiltration of radon in homes.

No DOE funding will be used for radon testing.

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This is beyond the scope of the grantees weatherization program.

Radon will not be tested.

Radon will not be addressed as no homes will be tightened as a result of weatherization.

Client will be referred to EPA if they have concerns about radon.

There will be no training for radon testing or amelioration as this will not be address by grantee.

Client will be referred to EPA consumer's guide to radon if they express a concern.

No disposal, as radon will not be addressed.

Refrigerant

Refrigerant will be disposed of as per Clean Air Act 1990, section 608, as amended by 40 CFR82, 5/14/93. Refrigerator and room A/C vendors will provide docu subgrantee regarding proper disposal of old units. Subgrantee will maintain records in client files. Every attempt will be made to recycle old appliances.

H & S funds will not be used to pay for removal and disposal of old refrigerator and room A/C units. This cost will be included with the cost of the energy efficiency

No new units will be installed and old removed unless a vendor can certify to the above EPA regulations.

Refrigerant will be disposed of per the EPA guidelines mentioned above.

If refrigerant cannot be disposed of per EPA guidelines, refrigerator will not be removed, and a new refrigerator will not be installed.

We see no instance were referral would be recommended.

Assessors/inspectors will provide assurance that contractors/vendors are following the above regulations. State will monitor local agencies and local agencies will mo contractors/vendors to assure compliance.

Clients will be informed why and how refrigerant must be disposed of safely.

Disposal will be per EPA regulations mentioned above.

Smoke, Carbon Monoxide Detectors, and Fire Extinguishers

Installation or replacement of smoke/CO detectors is allowed where detectors are not present or are inoperable. Replacement of operable smoke/CO detectors is n Providing fire extinguishers are not allowable.

DOE funds can be used for installation of smoke/CO detectors in homes receiving weatherization measures.

Grantee does not envision this to be beyond the scope of DOE WAP.

Smoke detectors may be installed in all dwellings weatherized where detectors are not present or are inoperable. CO detectors or combination smoke/CO detectors homes with combustion appliances.

Where available, client can be referred to local agencies such as fire departments for installation of smoke alarms.

Training will be provided to assessors in installation of smoke/CO alarms.

Clients will be educated on the operation of smoke/CO detectors installed by weatherization crews.

Inoperable units will be removed when possible and disposed of per EPA guidelines.

Smoke/CO detectors can be installed per manufacturer's guidelines in all dwellings where detectors are not present or are inoperable. Agency may install as many u recommended/required under current local building code. Agencies will include a clause in their initial application packet that releases the Agency and or staff from ar of weatherization work done to the client's home. Agency will provide instruction for use and maintenance of the installed device(s).

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Solid Fuel Heating (Wood Stoves, etc.)

There are very few wood stoves in grantees territory due to the mild climate.

These would only be found at very high elevations. It is not anticipated that any will be found in client homes. However, maintenance, repair, and replacement of prin units is allowed where occupant health and safety is a concern. Maintenance and repair of secondary heating units is allowed.

DOE funds can be used for this measure, but very few, if any, are expected.

If solid fuel heating units are beyond the scope of WAP, the unit would be deferred.

A licensed contractor would be hired to inspect the wood stove for safety, proper installation and venting. If the unit is found defective, it will be repaired or replaced efficient unit.

If the cost of repair/replacement is beyond the scope of WAP, the unit would be deferred.

Client may be referred to other local social service agencies for assistance.

No training will be provided to WAP crews. Only a licensed contractor will be hired to perform this work.

Client will be educated as to the dangers of an improperly burning combustion appliance in the home.

Disposal of any old units will be done by the vendor.

Space Heaters, Stand Alone Electric

Because of grantee mild climate very few space heaters are found in client homes. Repair, replacement, or installation is not allowed. Removal is recommended.

DOE funds will not be used for space heaters.

This is beyond the scope of DOE WAP and will not be addressed.

Crew will check circuitry to ensure adequate power supply for existing space heaters.

No work will be done on space heaters.

Clients may be referred to other agencies if units are unsafe.

Crews will be trained on basic electrical safety.

Agency staff will inform clients of the hazards and collect a signed waiver if client does not permit removal of unit.

Space heaters will be disposed of per local regulations.

Space Heaters, Unvented Combustion

Because of grantee's mild climate very few space heater are anticipated to be found.

If they are found, removal is required, except if unit conforms to ANSI Z21.11.2, prior to any weatherization.

DOE funds may be used for testing for air-free carbon monoxide (CO) and checking for ANSI labeling.

If unit is determined to not meet the ANSI standard and client refuses removal, weatherization cannot be performed.

Unsafe units will be removed from home. Testing for air-free carbon monoxide is allowed.

Weatherization will be deferred if unsafe units are not removed from home.

Client may be referred to other agencies for heating assistance.

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Crews will be trained to understand the dangers of unvented space heaters and to perform air-free CO testing (or hire a licensed contractor to do so).

Crew will inform client of dangers of unvented space heaters- CO, moisture, and NO2.

Old units will be disposed of per local regulations.

Space Heaters, Vented Combustion

It is not anticipated that these heaters will be found in grantees territory due to the mild climate. However, if vented space heaters are discovered, venting will be test furnaces. Draft and CO testing will be conducted, and for steady state efficiency, if possible.

DOE funds can be used to test vented space heater. Repair and replacement is not allowed.

Only if the costs go beyond the allowable cost of weatherization would this be beyond the scope.

Repair or replacement of the faulty space heater by a licensed contractor.

Work would be deferred if the cost of repair or replacement was beyond the DOE allowable cost per unit.

Clients may be referred to other agencies if work is beyond the scope of DOE.

Agency crew will be trained to recognize and test vented combustion space heaters.

Clients will be educated as to the dangers of CO from space heaters that are not properly vented.

Disposal of any heaters removed would be according to local codes.

Spray Polyurethane Foam (SPF)

No spray polyurethane foam will be used as no air sealing is done to homes in grantees territory due to the mild climate.

Ventilation

When no air sealing measures are performed on a home, grantee is requesting an exception from whole house ventilation and local exhaust provisions of ASHRAE 62.2-2016 Ventilation and Acceptable Indoor Air Quality in Low-Rise Buildings. Grantee will follow option B of ASHRAE 62.2-2016.

DOE funds will be used for comply with ASHRAE 62.2-2016 Ventilation requirements whenever air sealing is performed on a home. However, because few low-income eligible homes have central A/C and are open to natural ventilation, it is not anticipated that air sealing will be done at this time.

If a home is assessed that has central A/C or appears to not have adequate natural ventilation, it will be deferred until a proper assessment can be made by a "licensed professional."

If it becomes too expensive or difficult to have home comply with the ventilation requirement, work will be deferred.

Client will be referred to local agencies if repair/replacement is beyond the project scope.

Training will be provided to local agencies on meeting this requirement. Training will take place in next six months and grantee has one year to demonstrate full compliance requirement.

Client will be provided with information regarding adequate ventilation and how it can enhance indoor air quality and prevent pollutants and moisture from accumulating.

Any materials used in meeting the ventilation requirement will be disposed of per local code requirements.

In meeting the provisions of ASHRAE 62.2-2016, grantee proposes an exception to Section 4. Whole-Building Ventilation. Grantee feels they have met the criteria defined by a) residential buildings in grantees territory have no central mechanical cooling systems and are located in Climate Zone 1, and b) authority having jurisdiction that window operation is a locally permissible method of providing ventilation. Homes being weatherized have no "pressure boundary" as defined by ASHRAE 62.2 there is no separation of indoor and outdoor air as almost all homes in grantee territory have windows and doors open to natural ventilation most of the year. Most have around a ratio of 14% window area to floor area, far exceeding 62.2 -2016, and ensures a free flow-through, virtually eliminating IAQ and mold problems.



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Due to the constant average temperatures where even the extreme highs and lows are near or above the typical design of 65F, envelope air sealing and insulation is cost effective and will not be a part of the program. The only A/C in weatherized homes will be individual room A/C and will be primarily operated at night in bedrooms. Windows will likely be openly ventilated during the day. As the relative humidity is typically high, both exhaust and intake ventilation to a room with A/C would only serve to introduce moisture into the room. This would make the room uncomfortable, cause higher energy consumption by the A/C, and would likely decrease IAQ as increased condensed surfaces in the room promoting the growth of mold and mildew.

Regarding Section 5, Local Exhaust, if there are signs of mold in often closed rooms with a high internal moisture source and potential for strong odors, spot ventilation is required. This means a low speed bath exhaust fan with a minimum 70 cfm will be installed in bathrooms with existing moisture problems evident to the pre-weatherization assessment.

In order to meet Section 6 of ASHRAE 62.2-2016, measures will be taken to minimize air movement across envelope components separating dwelling units from each other to avoid any possible CO infiltration. Since the homes are not conditioned, there is no point in sealing off unconditioned crawl spaces and attics.

Clothes dryers will be exhausted directly to the outdoors.

Although rare, grantee will assess any combustion and solid-fuel burning appliances as indicated earlier in this document and assure that they are provided with adequate ventilation air and vented in accordance with manufacturer's instructions.

Grantee proposes to train all weatherization staff on identification of ventilation, IAQ, mold, and moisture issues within the next 6 months and provide ventilation assessment and H&S home assessment procedures. Contractors will be identified who are capable of installing exhaust fans and venting dryers where necessary. Grantee will have protocols in place by the beginning of the FY13 program year.

#### Window and Door Replacement, Window Guards

Window and Door replacement are not an allowable weatherization cost.

DOE funds will not be used to replace windows or doors.

This is beyond the scope of the grantees program.

If home is in total disrepair, weatherization will be deferred until repairs are made.

Client will be referred to other agencies for any window or door repair or replacement.

## V.8 Program Management

### V.8.1 Overview and Organization

The VIEO is organized to administer respective program functions through VIEO WAP and will serve as a direct service grantee with no subgrantees.

#### **The Virgin Islands Energy Office, through Federal funds:**

Is the primary administrator of energy programs in the Virgin Islands. The VIEO is charged with establishing and monitoring the integration of programs and policies for energy conservation, use, control, and allocation of energy. The VIEO has embarked upon numerous undertakings that have positively impacted the economic and environmental conditions of the Virgin Islands.

Provides technical assistance to local agencies and communities in developing and carrying out such programs.

Provides the Governor with information with respect to programs and policies of energy efficiency and renewable energy.

Acts as an advocate for energy efficiency and renewable energy at the territorial and national level and provides the Governor, Legislature and other public and private entities with information on how energy impacts socioeconomic conditions affecting all Virgin Islanders especially low-income Virgin Islanders as requested.

Mobilizes federal and territorial energy resources to enable the Governor to effectively respond to the needs of who are economically or socially disadvantaged.

Monitors, conducts, supervises, and administers those matters pertaining to energy program funded. In Virgin Islands in coordination with pertinent state and federal agencies by the Governor, or appropriate Federal authorities, with the concurrence of the Governor.

VIEO Organization is as follows:

VIRGIN ISLANDS ENERGY OFFICE (VIEO)

WEATHERIZATION ASSISTANCE PROGRAM (WAP)

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2023 ORGANIZATION CHART

Director  
Kyle Fleming

Deputy Director  
Michael Jaffurs

Grants Program Coordinator  
Alanna Brenneman

Administrative Officer I  
Jarell O'Connor

Audit Inspector St. Thomas and St. John  
Calvert Charleswell

Audit Inspector St. Croix

To be hired with Admin/Fringe funds WAP BIL

**V.8.2 Administrative Expenditure Limits**

Position	Annual Salary	% Charge to Grant	WAP Formula Salary	WAP Formula Fringe	WAP BIL Salary	WAP BIL Fringe	Gen Fund Salary
Administrative Officer I	\$36,909.28	100%	36,909.28	21,344.42			\$0.00
Administrative Aide	\$36,000.00	50%	24,720.00	16,107.75			\$24,720.00
Audit Inspector (STT)	\$41,200.00	50%	20,600.00	14,700.77			\$20,600.00
Audit Inspector (STX)	\$40,000.00	50%			20,000.00	14,000.00	\$20,000.00
<b>TOTALS</b>	<b>\$154,109.28</b>	<b>\$2.50</b>	<b>\$102,229.28</b>	<b>\$66,152.94</b>	<b>\$20,000.00</b>	<b>\$14,000.00</b>	<b>\$65,320.00</b>

**V.8.3 Monitoring Activities**

A. Approach. The Grantee will conduct comprehensive monitoring of its operation and file a written report which will be available for review by the PO during the or comprehensive monitoring will be performed by Grantee staff and will include the following areas and details:

- 1 Programmatic and Management Monitoring
- 1 Financial/Administrative
- 1 Audits
- 1 Payroll/Personnel
- 1 Procurement
- 1 Davis Bacon (Recovery Act only)
- 1 Vehicles, Equipment, Inventory, Materials
- 1 Eligibility
- 1 Program Overview (Client File Review, Work Orders, etc.)
- 1 Rental
- 1 Feedback and Reporting
- 1 Energy Audits
- 1 Field Work
- 1 Health & Safety
- 1 Final Inspections
- 1 Training & Technical Assistance
- 1 Invoicing

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- I Records Retention
- I SERC Monitoring (if applicable)
- I Staff or entity performing the monitoring
- I How monitoring results are handled and required followup procedures

**B. Production.**

Direct Service Grantee will inspect 100 percent of all production and confirm the quality and completeness of work before reporting the completed unit to the Grant Grantees will complete reviews of at least 5 percent of each completed weatherized units (with DOE funds).

The Grantee will also review units "in progress" beyond the 5 percent completed units, in order to assess: quality and compliance; appropriate and allowable materials and accuracy of energy audits (no missed opportunities); comprehensive final inspections; safe work practices, such as lead safe weatherization protocols; and other relevant to onsite work. If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, major measures missed, the take appropriate corrective action to resolve the outstanding issues in a timely manner. The Grantee State Plan must describe the process for meeting this requirement program year, the Grantee will have completed a review of its latest financial audit. Failure to comply with this requirement is sufficient cause to require special conditions under 10 CFR 600.212.

**C. Visit.** The Grantee staff or contractor will follow the identified monitoring areas under the Approach section and ensure these areas are reviewed within the monitoring period. Health and Safety issues that present imminent danger to people in the house are found during a visit, the Grantee will immediately resolve the issues. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

**D. Tracking and Analysis.** All the results of Grantees monitoring including, financial reviews, will be tracked by the Grantee to final resolution. The tracking record will include concerns, recommendations, commendations, best practices, corrective actions, deliverables, technical assistance and training provided, and resolutions. As required, within 30 days after each monitoring visit, a written report (identifying findings, concerns, recommendations, commendations, and best practices) and any corrective actions, as provided to the Subgrantee.

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

**Employee Training**

New employees should not begin working in the field until training is provided. Training will include:

- a. Conventional health and safety issues such as heavy lifting, safe ladder usage, electrical safety, power tools, other work practices, and conditions encountered in the weatherization program.
- b. Use, maintenance, and importance of protective equipment such as eye and ear protection, respirator, and gloves.
- c. Proper usage of hazardous chemicals and substances such as foams, sealants, and cleaners in the weatherization work environment.
- d. The Material Safety Data Sheets (MSDS) provided by suppliers that describe the method to properly handle potentially hazardous materials. Inform employees where materials are located, how to understand their content, and how to obtain and use appropriate hazard information.

**TRAINING AND TECHNICAL ASSISTANCE (T&TA)**

The VIEO and VI WAP will utilize T&TA funds for attending local and national weatherization training meetings and conferences.

**TRAINING REQUIREMENTS**

The VIEO WAP Administrative Officer and Audit Inspector will be QCI (Quality Control Inspector), Energy Auditor, and BA (Building Analyst Technician) certified through southface.org. As defined in the budget, Auditor(s) will complete the Home Energy Professional (HEP) Quality Control Inspector (QCI) course Auditor certification as well as the BPI Building Analyst (BA) Professional certification.

This training is IREC Certified and requires recertification every three years and the VIEO WAP Administrative Officer and Audit Inspector(s) will be compliant with the end of 2023. The VIEO WAP Deputy Director, Grants Program Coordinator, Administrative Officer and Audit Inspector also utilize NASCSP's Annual Training, but not limited to:

2024 Winter Conference Dates TBD

VIEO WAP team may participate in new training opportunities as they become available.

**VIEO T&TA Analysis:**

The Training and Technical Assistance (T&TA) Plan activities are intended to maintain or increase the efficiency, quality, and effectiveness of VIEO WAP at all levels. Moving forward will include DOE monitoring visits, internal state audits, IG reports, analysis of effectiveness, field monitoring, and feedback from the clients served at

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VIEO is found to be inefficient or in need of correction.

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**

**DISASTER RELIEF**

The Virgin Islands Energy Office Weatherization Assistance Program (VIEO WAP) Disaster Relief Plan is to provide emergency services to low-income individuals the time of the disaster have a six month notice of certification from the Dept. of Human Services Energy Crisis Assistance Program (ECAP) and have been affected determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency.

During the emergency, agencies will be required to report activities performed and shall coordinate their efforts with other disaster assistance programs, such as FEMA provide assistance to the community. The VIEO WAP program manager will submit to the DOE a report of activities performed or suspended during the emergency related to the WAP program will be included in the report.

The plan will be in effect for a minimum of six months but could be extended dependent upon the anticipated recovery period.

Disaster relief services are only available to qualified low-income households directly affected by the declared disaster. VIEO WAP may reprioritize service requests households so that timely weatherization can be provided. Dwellings may only be provided weatherization services that are not paid for by insurance. The burden of is not covered by insurance is put on the policy holder.

Emergencies may be a result of natural or manmade factors. The Weatherization Assistance Program works within the WAP guidelines in WPN 127 to assist the territorial authorities in normalizing areas affected by a disaster by providing WAP resources to assist Virgin Islands low-income citizens in recovering and rebuilding after the Weatherization Program will adhere to the WAP guidelines when responding to any disasters.

Disaster mitigation planning activities shall be implemented as soon as practical after the declaration of a disaster. The VI WAP shall not commit WAP resources (lab receives approval from the VIEO).

Any additional disaster related funds will be allocated based on the extent of the disaster in each district area. Funds must supplement, not supplant, other funds available assistance. All funds received by the client to cover damages must be considered prior to the allocation of WAP resources.

Safety measures, such as downed power lines, must be in place prior to mitigation activities. VI WAP staff should consult with local utilities to ensure electric, gas are been corrected or repaired.

Allowable disaster activities may include Weatherization of eligible homes. The following VI WAP priority list is recommended for disaster homes.

- Replacing damaged refrigerators

**Eligibility Requirements**

VI WAP must ensure that applicants for disaster assistance (1) meet the current eligibility requirements, (2) are located within the designated disaster area and (3) have affected by the disaster. Homes located in FEMA sanctioned areas are not eligible for assistance.

Applicant homes must be certified as habitable, and a disaster certification form must be completed, signed and retained in the client file. The owner of a rental unit must with Section 8 or provide other proof that the unit will remain exclusively for the low income.

Client income eligibility may be based on one month's income, and client certification will suffice if no documentation is available. Clients who have been qualified as eligible and have Vic electricity in their home at the time of the disaster will be served first. Other eligible clients will be served as soon as power is restored.

If disaster damaged dwellings have been previously weatherized, they may be re-weatherized without regard to the initial date of weatherization if the damage is not repaired. Victims may receive repair or replacement to domestic hot water heaters as a health and safety measure.

**Additional Funding**

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If additional funds are received, the VIEO WAP may allocate up to \$6,000 per unit. If no additional funds are received, the state cost limits apply. Program operation used to support mitigation and cleanup activities. No additional administrative funds will be provided for disaster work.

Disaster Expenditures Accountability and Reporting

Disaster expenditures must be accounted for and reported on the monthly and quarterly report.

Contributions VIEO WAP will not require an owner/landlord for a co-participation match contribution at the time of disaster that hinders the client's chances for recovery if the landlord does not agree or cannot afford to contribute.

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