



Department of Energy
Washington, DC 20585

WEATHERIZATION PROGRAM NOTICE 25-1
ISSUED DATE:

SUBJECT: PROGRAM YEAR 2025 WEATHERIZATION GRANT APPLICATION

EFFECTIVE DATE: Weatherization Program Notice (WPN) 25-1, Application Instructions, and Administrative and Legal Requirements Document (ALRD) are exclusively intended for Weatherization Assistance Program (WAP) Grantees in Program Year (PY) 2025.

INTENDED AUDIENCE: Weatherization Grantees and Weatherization Subgrantees

INTENDED USE: The Department of Energy (DOE) issues WPNs to establish the framework to administer congressionally appropriated funds to WAP Grantees. This document and attachments provide information for developing a WAP Grantee Plan. Complete Plans ensure funds are dispersed in a timely manner.

DOE issues the application package annually to provide instructions on completing Grantee Plan applications. Changes from year to year are often precipitated by congressional inquiries, administrative priorities, including new initiatives from other federal agencies, monitoring in the field, and feedback from the network of stakeholders. The annual document, issued as a WPN, addresses these issues, and provides resources for Grantees to include the information, as appropriate, to their specific circumstances in applying for WAP formula funds.

WPN attachments serve as programmatic, financial, and legal resources with instructions through the Application Instructions that must be incorporated into the submitted Grantee Plan. Grantee Plans are submitted electronically through WAP's reporting system, [Performance and Accountability for Grants in Energy \(PAGE\)](#).

PAGE contains all federal forms required for the application. Please follow the instructions in the ALRD and the Application Instructions attached to this WPN.

The following sections address:

1.0 Purpose

2.0 Program Priorities and Initiatives

3.0 Funding

4.0 Applications for WAP Annual Formula Grants

5.0 Weatherization Program Notices and Memoranda

6.0 Website Information

1.0 PURPOSE

To issue grant guidance and management information to WAP Grantees for PY 2025 based on the following documents:

- Attachment 1: Administrative and Legal Requirements Document (ALRD)
- Attachment 2: Application Instructions, to be used by all fifty states, the District of Columbia, and U.S. Territories, Native American Tribes, and local applicants as supplemental information when applying for direct grants under the Weatherization Assistance Program for Low-Income Persons.

BACKGROUND: WAP is operating under a short-term Continuing Resolution (CR) for Fiscal Year (FY) 2025, expiring December 20, 2024. For planning purposes, until a final full year FY 2025 budget is passed and signed by the President, Grantees should develop their Grantee Plans using the same funding level as PY 2024 allocation with the PY 2023 Appropriated Funds outlined formula updates, to be shared in WPN 23-2. Should Weatherization Memorandum 139, WAP Draft Formula Update for Program Year 2025. DOE will issue additional guidance to Grantees should Congress pass a full-year CR or a final appropriations bill, and it is signed by the President.

For planning purposes, WPN 23-2 allocations will Memo 139 allocations (adjusted to reflect formula adjustments) suffice. However, DOE will adjust the allocations to Grantees based on final FY 2025 appropriations. **NOTE:** Grantees are advised to include language in draft Grantee Plans and in public hearing notices that clearly explains that final WAP allocations will include adjustments from the planning numbers reflected in WPN 23-2 and the draft Grantee Plan necessary to align with final DOE appropriations for WAP reflect adjustments between the dollar amounts of Memo 139 or subsequent WPN 25-2 final WAP appropriations.

When the FY 2025 budget is passed and signed by the President, DOE will issue WPN 25-2, Program Year 2025 Grantee Allocations. Then, if necessary, Grantees with approved PY 2025 Plans can begin the budget modification process.

1.1 SCOPE

The provisions of this WPN apply to Grantees or other entities named in the Notification of Grant Award as the recipient(s) of financial assistance under WAP.

1.2 LEGAL AUTHORITY

Title IV, Energy Conservation and Production Act (ECPA), as amended, authorizes the Department to administer WAP (42 U.S.C. § 6861, *et. seq.*). All grant awards made under this Program shall comply with applicable law and regulations including, but not limited to, WAP regulations contained in the Code of Federal Regulations (CFR) at [10 CFR 440](#) and DOE Financial Assistance Rules at [2 CFR 200](#).

Financial Assistance Rules, 2 CFR 200, Update: On September 22, 2023, the Office of Management and Budget (OMB) announced plans for significant revisions to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) located in title 2 of the Code of Federal Regulations (CFR). The changes aim to reflect recent OMB priorities related to Federal financial assistance and improve Federal financial assistance management, transparency, and oversight. A Federal Register Notice was published on October 5, 2023, that provides the proposed revisions.

Uniform Guidance updates impacting WAP:

- Section 200.313, relating to equipment, OMB increased the threshold value for equipment from \$5,000 to \$10,000.
- Section 200.307, relating to program income, OMB provided clarifications in paragraph (a) regarding use and expenditure of program income, including allowing program income for certain closeout costs. OMB also revised and provided further clarifying guidance in paragraph (b) for each of the three methods for use of program income.
- Section 200.319, relating to competition, OMB removed the prohibition on using geographic preference requirements in procurement.
- Section 200.321, relating to Contracting with small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms, OMB added "veteran-owned business" to the types of businesses that recipients and subrecipients are encouraged to consider for procurement contracts under a Federal award.
- Section 200.414, relating to indirect costs, OMB raised the de minimis rate from 10 percent to 15 percent.
- Section 200.501, relating to audit requirements, OMB raised the audit threshold from \$750,000 to \$1,000,000.

The updates to 2 CFR 200 have an implementation date from OMB of October 1, 2024.

The table in Section 5.0 has been updated to list all active WPNs at the time of issuance of this guidance. The table provides references to assist Grantees in developing their Plans, policies, and procedures; as well as Memoranda updating activities and topics of interest.

~~GRANT GUIDANCE REORGANIZATION: DOE WAP's last major rewrite of the Annual Guidance, "Dash One (-1)," was WPN 13-1 to remove all material that was repeated in the Application Package and other WPNs. The objective of the process was to only include in "Dash One (-1)" any major pieces of "new" material for that PY in the Program Priorities section. DOE has exercised this process again for WPN 24-1.~~

2.0 PROGRAM PRIORITIES AND INITIATIVES

DOE undertakes initiatives to improve WAP operations and effectiveness. Subsections of 2.0 below inform Grantees of current and future priorities. They are not considered Program policy until provided in a related WPN.

2.1 PARTICIPATION IN ASSESSMENTS AND STUDIES

WAP plans to invest in program assessments to update previously completed studies and assess the progress and success of the latest programs. *Grantees and Subgrantees will be expected to participate in these assessments*, to provide insight on Program outcomes such as:

- Energy and non-energy impacts.
- Benefits delivered to disadvantaged communities.
- Weatherization workforce demographics and diversity.

WAP Grantees and Subgrantees are encouraged to participate in evaluations/studies related to weatherization programs. Particularly, Grantees are urged to conduct regular program evaluations. While national-level studies allow DOE to see macro elements, by participating in regional, state, or local evaluations/studies, more clarity can be attained on the impact specific protocols have on the energy savings and other benefits garnered through WAP. Grantees are urged to establish a protocol for Subgrantees to follow when asked to participate in an evaluation or study. Grantee's policies should include information about the purpose of the study and ensure that privacy of recipients is maintained. Information requests range from informal inquiries by local elected officials and other community leaders to requests for specific information about recipients from local and regional press outlets.

See Section V.6 Weatherization Analysis of Effectiveness in the PY 2025 Application Instructions for more information.

2.2 WEATHERIZATION READINESS FUNDS

Weatherization Readiness Funds (WRF) were included for WAP in H.R. 2471, the Consolidated Appropriations Act, 2022. Through this ~~set-aside separately appropriated~~ fund, WAP addresses necessary repairs (e.g., health and safety issues, structural repairs) in dwellings and reduces the frequency of deferrals of homes eligible for weatherization services. DOE issued WPN 24-9: Weatherization Readiness Funds - Implementation to provide additional clarification to Grantees on expectations for utilizing WRF and addressing deferrals.

Grantees are encouraged to track deferrals using consistent terminology for recording the *reasons* and *what repairs would be necessary* to proceed with weatherization. To assist Grantees, DOE developed the [deferral classification guide and tracker](#) template as an optional tool for tracking deferrals which aligns to anticipated reporting requirements. The tool provides consistent terminology, and a brief training video is available describing how the tool is organized. DOE is developing training resources in the [Learning Management System](#) (LMS) to assist Grantees in braiding funds to address structural issues and enable deeper retrofits.

See Section V.1.2 Approach to Determining Building Eligibility in the PY 2025 Application Instructions and Section 4.5 Reporting Requirements below.

2.3 INNOVATION FUNDING OPPORTUNITIES

DOE offers competitive grants for deploying and demonstrating innovative technologies, and approaches beyond the scope of WAP formula as funds are available. At least one opportunity is anticipated in PY 2025. On July 30, 2024 using available Bipartisan Infrastructure Law (BIL) funds: \$25 million for, DOE published WAP Memorandum 134, WAP Enhancement and Innovation (E&I) and \$70 million for Sustainable Energy Resources for Consumers (SERC) grants. E&I and SERC grants are not subject to the Average Cost Per Dwelling Unit expenditure limit or Savings to Investment Ratio requirements of the WAP formula program. More Funding Opportunity Announcement for \$36 million in Enhancement and Innovation (E&I). Applications are due on October 11, 2024, and a selection notification is anticipated in late February 2025. Innovation program information about the innovation programs, including awarded projects, is available on the DOE WAP website: [Weatherization Innovation | Department of Energy](#).

~~On June 27, 2023, DOE published an E&I Funding Opportunity Announcement, with the goal of selecting projects and beginning negotiations in the summer of 2024 (see [Weatherization Memorandum 108: Bipartisan Infrastructure Law \(BIL\) WAP Enhancement & Innovation Funding Opportunity Announcement \(DE FOA 0002912\)](#)). Concept papers for this opportunity were due August 31, 2023.~~

~~On August 21, 2023, DOE published [WAP Memorandum 112: Notice of Intent \(NOI\) to Release a Funding Opportunity for Sustainable Resources for Consumers \(SERC\) Grants Under the Bipartisan Infrastructure Law \(BIL\)](#) notifying WAP Grantees and Subgrantees of the intent to release the \$70 million BIL SERC funding opportunity in fall 2023.~~

~~WPN 23-2: Grantee Allocations and WPN 24WPN 24-2 and WPN 25-2 (forthcoming) include funding amounts reserved for future innovation opportunities. DOE will publish additional WAP Memorandums to announce opportunities and share application instructions.~~

2.4 FEDERAL COORDINATION EFFORTS

WAP, the U.S. Department of Health and Human Services (HHS) Low-Income Home Energy Assistance Program (LIHEAP), the U.S. Department of Housing and Urban Development (HUD) Lead Hazard Control and Health Homes Programs and the U.S. Department of Agriculture continue to collaborate and support interagency coordination, especially for client eligibility. Each agency serves households with lower incomes, using varying income eligibility requirements. WAP will continue to work with Grantees and Subgrantees to address additional barriers and facilitate effective braiding of funds. DOE is committed to ensure the weatherization network is fully supported in their efforts to use resources effectively and meet community needs through leveraging non-traditional sources of funds for repairs and costs WAP is not able to address through the DOE Program.

2.5 WORKFORCE DEVELOPMENT

WAP can attract a diverse, quality, and well-trained network, building the clean energy workforce. Grantees will receive a Training & Technical Assistance (T&TA) allocation to support workforce development activities. Applicants are highly encouraged to develop comprehensive and need-specific training plans that include the use of workforce partners, unions, community colleges, potential supportive services, registered apprenticeships, labor-management partnership training programs, or other high-quality training models. DOE will continue to develop resources to address identified barriers and promote workforce expansion and diversity including approaches that incorporate strong labor standards, such as the use of project labor agreements. Further, DOE strongly encourages Grantees to braid other resources with WAP, to increase deployment of new technologies and to expand and enhance workforce skills.

2.6 EQUITY AND THE JUSTICE40 INITIATIVE

Justice40 (J40), established through [Executive Order \(EO\) 14008, Federal Register: Tackling the Climate Crisis at Home and Abroad](#), is a whole-of-government effort to ensure that federal agencies work with states and communities to deliver at least 40% of the overall benefits from federal investments in climate and clean energy to disadvantaged communities. ~~The Office of Management and Budget (OMB) released Memorandum 21-28 in 2021, which instructed federal agencies to use the following definitions of Community and Disadvantaged:~~

- ~~● Community: Agencies should define community as “either a group of individuals living in geographic proximity to one another, or a geographically dispersed set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions.”~~
- ~~● Disadvantaged: Agencies should consider appropriate data, indices, and screening tools to determine whether a specific community is disadvantaged based on a combination of variables that may include, but are not limited to, the following:~~
 - ~~○ Low income, high and/or persistent poverty.~~
 - ~~○ High unemployment and underemployment.~~
 - ~~○ Racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities.~~

- ~~○ Linguistic isolation.~~
- ~~○ High housing cost burden and substandard housing.~~
- ~~○ Distressed neighborhoods.~~
- ~~○ High transportation cost burden and/or low transportation access.~~
- ~~○ Disproportionate environmental stressor burden and high cumulative impacts.~~
- ~~○ Limited water and sanitation access and affordability.~~
- ~~○ Disproportionate impacts from climate change.~~
- ~~○ High energy cost burden and low energy access.~~
- ~~○ Jobs lost through the energy transition.~~
- ~~○ Access to healthcare.~~

WAP defines a disadvantaged community as a geographically dispersed set of individuals sharing the common conditions of experiencing high energy burden, low income, and/or high or persistent poverty, meaning every household served by WAP is considered part of a disadvantaged community. WAP competitive funding opportunities, such as the E&I grant, may ask grant recipients to track the number of households that fall within the boundaries of disadvantaged census tracts as defined by the [Climate and Economic Justice Screening Tool](#) or other approved energy and environmental justice screening platforms.

~~Not all WAP expenditures are considered J40 investments. Expenditures that fall within the categories of Program Operations, Health and Safety, Weatherization Readiness, and T&TA are considered J40 investments in disadvantaged communities, while expenditures in Grantee or Subgrantee Administration, Vehicles & Equipment, Liability Insurance, and Financial Audits are not.~~

~~The White House published EO 14096, “Revitalizing Our Nation’s Commitment to Environmental Justice for All” in April 2023, which builds upon a 1994 Executive Order affirming that federal government agencies make achieving environmental justice part of their missions. In line with these executive orders, WAP developed a Justice40 Implementation Plan with stakeholder feedback, which was incorporated into DOE’s annually updated Equity Action Plan. With the valuable input of the weatherization network, DOE will continue to develop resources to address barriers to delivering weatherization services to disadvantaged communities and promote approaches to serve households with the highest energy burden.~~

See Sections V.3 Prioritizing Clients and V.6 Weatherization Analysis of Effectiveness in the [PY 2025 Application Instructions](#).

2.7 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) & HISTORIC PRESERVATION

Grantees must review and follow their NEPA determination and historic preservation programmatic agreement (PA), as applicable, to ensure they comply with all restrictions. An Environmental Questionnaire (<https://www.eere-pmc.energy.gov/NEPA.aspx>) must be submitted

for any activities not listed in the NEPA determination. DOE must complete a NEPA review, and a Contracting Officer must provide written approval before work is initiated on any activity not included in the NEPA determination. Activities not included in the NEPA determination will be deemed unallowable, and the Grantee will be required to repay any unallowable funds to DOE.

All Grantees except Guam have a DOE executed PA for historic preservation compliance. Guam must follow the added restrictions in their NEPA determination for compliance under the National Historic Preservation Act (NHPA). All DOE executed PAs and amendments are available at [Historic Preservation – Executed Programmatic Agreements | Department of Energy](#).

Most Allowable Activities are more restrictive than the Categorical Exclusion. The restrictions included in the Allowable Activities must be followed. Activities on Tribal lands or Tribal properties are restricted to homes/buildings less than forty-five (45) years old and without ground disturbance. The Allowable Activities include only non-ground disturbing activities. Quarterly NEPA logs are not required.

The NEPA determination with the list of Allowable Activities, which will be attached to this WPN (Attachment 3) once final, is applicable to Grantees **WITH** a DOE executed PA and can be used for planning purposes. The list of states, their PAs, and amendments can be found here.

The NEPA determination with the award documents each year must be followed. Grantees must adhere to the restrictions of their DOE executed Historic Preservation PA.

- Additionally, Grantees are responsible for identifying and promptly notifying DOE of extraordinary circumstances, cumulative impacts, or connected actions that may lead to significant impacts on the environment, or any inconsistency with the “integral elements” (as contained in 10 C.F.R. Part 1021, Appendix B) as they relate to a particular Project.

DOE is also required to consider floodplain management and wetland protection as part of its environmental review process (Subpart B of 10 CFR 1022). As part of this required review, DOE determined requirements set forth in Subpart B of 10 CFR 1022 are not applicable to the activities described above that would occur in a floodplain or wetland because the activities would not have short-term or long-term adverse impacts to the floodplain or wetland. These activities are administrative or minor modifications of existing facilities to improve environmental conditions. All other integral elements and environmental review requirements are still applicable.

Grantees must comply with Section 106 in an annual Historic Preservation Report. Clarification concerning the content of Grantee responses to each section of the report can be found in [PAGE under the Reference Library](#).

TRIBAL PROPERTIES: The PAs are not applicable to activities on Tribal land or Tribal properties. As a result, any proposed work on Tribal land or property will require prior review and approval from DOE NEPA. If DOE determines that consultation with the State Historic Preservation Office (SHPO) SHPO or Tribal Historic Preservation Office (THPO) is required, DOE will consult with the SHPO or THPO. This review can take thirty (30) days once complete information is received by the SHPO or THPO. Separately, DOE is also responsible for government-to-government consultation with Tribes, as needed.

To assist Grantees in complying with this law, DOE has created a Historic Preservation Worksheet (HPW) and included an HPW example. The HPW is to be used when work included in the NEPA determination is planned on homes or buildings located on Tribal land or property that are forty-five (45) years or older.

A HPW must be completed by the Subgrantee or Tribe who is doing the work and submitted by the Grantee to their DOE Project Officer (PO). Following review of the HPW, the DOE PO sends the HPW to the DOE National Environmental Policy Act (NEPA) Office.

The DOE NEPA Office will review the HPW to ensure compliance with Section 106 of the NHPA. **No weatherization work may begin until this process is complete and approval to begin work is given by DOE.**

Grantees and Subgrantees are responsible for reviewing the online NEPA and Historic Preservation PowerPoint trainings at www.energy.gov/node/4816816 and contacting NEPA with any questions at GONEPA@ee.doe.gov.

3.0 FUNDING

WAP funding listed in the application and requiring DOE approval prior to expenditure may derive from various sources:

- Appropriated Weatherization Assistance Program funding including Weatherization Readiness Funds and SERC grants.
- LIHEAP funds designated for expenditure under DOE regulations.
- Leveraged Resources designated for expenditure under DOE regulations (e.g., utility funds, state trust funds, other).
- Petroleum Violation Escrow (PVE) funds:
 - Warner and EXXON oil overcharge funds
 - Stripper Well and other oil overcharge funds (including Texaco) which are subject to Stripper Well Settlement rules.
- Program Income.

See Section III. Budget in the PY 2025 Application Instructions.

DRAFT

3.1 FY 2025 APPROPRIATED WEATHERIZATION ASSISTANCE PROGRAM FUNDING

WAP allocations for Grantees are determined annually in accordance with the formula in 10 CFR 440.10 based on the budget authorized by Congress. The Population Factor, the Climatic Factor, and the Residential Expenditure are the factors of this formula, which vary by data availability (per 10 CFR 440.10). Data for all factors were updated for PY 2025, although they rarely coincide due to different data collection cycles.

The following data were updated their respective organizations, and applied to the PY 2025 allocations:

- *Population Factor:* The number of low-income households, per state and the number of low-income households nationwide, is based on the U.S. Census American Community Survey (ACS), which is updated every 5 years. Supplementary data covering the U.S. Virgin Islands and Pacific Island territories are updated by the Census Bureau every 10 years.
- *Climatic Factor:* The 30-year, population weighted averages, of heating and cooling degree days, provided by the National Oceanic and Atmospheric Administration's (NOAA's) National Climatic Data Center (NCDC) which update every 10 years; and the Energy Information Administration's (EIA's) Energy Consumption and Expenditures; Residential Energy Consumption Survey (RECS), updated every 3-5 years.
- *Residential Expenditure Factor:* Total residential low-income household energy expenditures by Grantee, and residential energy expenditures per low-income household by Grantee, provided by EIA's RECS, which is updated every 3-5 years.

While the government is under a Continuing Resolution, PY 2025 Plans should create PY 2024 plans be created using WPN 23-2 funding amounts while the government is under a CR in WAP Memorandum 139, WAP Draft Formula Update for Program Year 2025. Once a budget is passed, and signed by the President, DOE will issue WPN 24-2 providing the PY 2025 final allocations of appropriated Weatherization funds appropriated will be issued via WPN 25-2.

3.1.1 ADJUSTED AVERAGE COST PER DWELLING UNIT (ACPU)

ACPU expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters cannot exceed \$6,500, as adjusted (see, [10 CFR 440.18](#)(a) and (c)). The adjusted annual average for PY 2025 is determined by using the percentage increase in the Consumer Price Index (CPI) (all items, United States city average) for FY Calendar Year 2023 or 3%, whichever is less. The percentage increase in the CPI for the previous 12-month period (September 2022—September/January 2023 – December 2023) was 3.7% 4.1%. DOE identified that since 2010 the fiscal year CPI instead of calendar year CPI was used for determining the ACPU. DOE is adjusting the ACPU from 2010 through 2024 based on the last update to ACPU language in statute 42 USC

6865(c)(3)(B)(1).¹ Therefore, the adjusted average expenditure limit for PY 20242025 is **\$8,497574**. **This average includes units completed in a multifamily building of 5 units or greater.**

In accordance with [10 CFR Part 440.18](#)(b) and (c), the expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters for a renewable energy system, shall not exceed an average of \$3,000 per dwelling unit, as adjusted. The percentage increase in the CPI for the previous 12-month period (~~September 2022—September~~January 2023 – December 2023) was ~~3.7%-4.1%~~. The same updates to the CPI data were applied for years 2007 through 2024 based on 10 CFR 440.18(c) for renewable energy systems. Therefore, the PY 20242025 adjusted average is **\$4,169302** **for renewable energy system measures with a Savings to Investment Ratio (SIR) greater than 1.**

Note: The adjusted average for renewable energy measures is not a separate average, but part of the overall adjusted average expenditure limit of \$8,497574. Currently Appendix A allows for use of solar (thermal) water heating systems. Some Grantees have been approved for installation of solar photovoltaics when they have submitted it as part of their Grantee Plan, received approval from the DOE Contracting Officer (CO), and amended their 5-year DOE-approved energy audit process.

3.1.2 LIMITATIONS ON CERTAIN BUDGET CATEGORIES

Certain budget categories have limitations set by law, regulation, or Program policy and identify the percentage of grant funding that can be used for specific purposes other than Program Operations.

See Section III. Budget of the PY 2025 Application Instructions.

3.2 LEVERAGED RESOURCES

Leveraged funds included in the budget of the DOE award must meet all WAP rules, regulations, and guidelines. Grantees should carefully consider the advantages and challenges related to including leveraged funds in the DOE award. Landlord contributions are not considered leveraged resources. Grantees who require further clarification or direction on leveraged resources should refer to [WPN 22-9: Managing Multiple Funding Streams within the Weatherization Assistance Program](#) and/or contact their DOE Project Officer (PO).

See Section III.1 SF424-A Budget Preparation in the PY 2025 Application Instructions.

¹ All previously issued ACPU's were to the benefit of Grantees. This update will not retroactively change previously issued ACPU.

3.3 PVE FUNDS

WAP can be funded by several sources, including PVE funds. PVE funds can be divided into two categories based on the source of the funds. The first category of PVE funds is comprised of those funds appropriated by Congress or treated as if appropriated (generically referred to as Exxon funds, and includes funds provided under the Warner Act). The second category of PVE funds is comprised of those funds that were not appropriated (generically referred to as Stripper Well Settlement funds and includes Diamond Shamrock funds).

- PVE funds are subject to funding source requirements.
- PVE funds included in a Grantee Plan are subject to the same Grantee Plan approval, Program oversight, and reporting requirements as the annually appropriated funds; and are subject to the **same** statutory and regulatory constraints as annually appropriated funds.
- Exxon funds used for weatherization projects must be included in the Grantee Plan. **Exxon funds cannot be used for administrative expenses.**
- A Grantee may use Stripper Well Settlement funds for projects separate from, or included in, WAP. Stripper Well Settlement funds are not subject to WAP rules, oversight, or reporting requirements if used for activities separate from WAP. However, DOE urges Grantees to include Stripper Well Settlement funds in the Grantee Plan for informational purposes only.
- There is no requirement that Exxon or Stripper Well Settlement funds be expended during a particular period. A Grantee is permitted to reallocate these funds from one eligible program to another provided that their Plan has been amended and is reviewed by DOE. If PVE funds designated for expenditure in the prior PY are not expended, the amount of funding that may be used for administrative expenses in the following PY must be adjusted accordingly.
- Up to 5% of the combined total of Exxon and Stripper Well Settlement funds budgeted in a Grantee Plan may be used for T&TA. Up to an additional 5% of these funds may be used for evaluation of a Grantee's WAP and for innovative efforts to leverage program funds, provided these activities are approved by the DOE PO.

See Section III.1 SF-424A Budget Preparation in the PY [2025](#) Application Instructions.

3.4 PROGRAM INCOME

Program income is defined in [2 CFR 200.1](#) and subject to the specific requirements provided in [2 CFR 200.307](#). WAP program income is funds earned by Grantees and/or Subgrantees from non-Federal sources when performing WAP activities. The income from these activities must be used for additional weatherization activities **during the period of performance or allowable closeout costs. Program income** must be treated as an addition to program funds and is subject to the same rules as appropriated funds. Property owner (i.e., landlord) contributions, leveraged resources (i.e., Grantee funds), and proceeds from the sale of equipment or supplies are NOT considered "program income" for the purposes of WAP. Grantees requiring further clarification on program income, should contact their DOE PO.

See Section III.1 SF424-A Budget Preparation in the PY 2025 Application Instructions.

3.5 BUDGET/EXPENDITURES/CARRYOVER

Grantees should allocate funds among the budget categories consistently, in alignment with WPNs and application instructions, particularly regarding how costs are allocated for weatherizing each dwelling.

~~For programming purposes, Grantees are expected to estimate carryover from the prior year and include that estimate in their Application Plan budget submission.~~

~~When new awards are issued (i.e., new grant is issued, new grant number/instrument), they cannot include carryover funding from any previous project period. Funds remaining from previous project periods will be de-obligated and reappropriated by the Office of Management and Budget. They will then be re-obligated using the formula to all Grantees.~~

See Section III.4 ~~Carryover Explanation Budget~~ in the PY 2025 Application Instructions.

4.0 APPLICATIONS FOR WAP ANNUAL FORMULA GRANTS

4.1 REPORTING REQUIREMENTS

Grantees and Subgrantees administering WAP are required by [10 CFR 440.24](#) to keep records as DOE deems necessary for an effective audit and performance evaluation, among other specific recordkeeping requirements. The reporting requirements are set forth in the Federal Assistance Reporting Checklist, DOE F 4600.2, attached to the award agreement. DOE requires Grantees to keep records related to client file documentation.

Grantee and Subgrantee systems must demonstrate:

- Program rules are followed (e.g., eligibility requirements).
- Appropriate cost-effective measures are installed (e.g., audit results are consistent with the work order generated and the invoice costs are consistent with those estimated in the audit).
- Health and safety issues are treated according to guidance.
- Inspections occur as required (e.g., 100% of the units are inspected and the post-inspection checklist includes the inspection of the audit assessment).

Grantees and Subgrantees are encouraged to utilize the [Client File Checklist](#) developed by DOE, which identifies elements anticipated to be in a “complete” WAP client file. The specific contents and how the information is organized may vary by Grantee. This is not a prescriptive list of forms or a mandated filing system. It is a tool to assist Grantees and Subgrantees in aligning file requirements to create a comprehensive client file that can adequately document how weatherization services were provided in a specific home.

By establishing consistent records, Grantees and Subgrantees can continue to execute DOE's expectation of high-quality management and proper documentation of WAP resources.

~~On August 21, 2023, DOE issued Weatherization Memorandum 111: Weatherization Assistance Program Data Collection Updates – REVISED to update Grantees and Subgrantees on the process to obtain approval from OMB for data collection tools and forms known as an Information Collection Request (ICR). Information was submitted to OMB on March 23, 2023, and the review is taking longer than originally anticipated. Therefore:~~

- ~~1. Grantees and Subgrantees may elect to use DOE funds, including both T&TA and Administrative, to begin adjusting data collection systems in anticipation of this implementation.~~
- ~~2. New data collection fields are anticipated to be implemented in PY 2024.~~
- ~~3. Until OMB approval is received, Grantees should continue following the reporting requirements in the Terms & Conditions (T&Cs) and PAGE.~~

~~Please refer to Weatherization Memorandum 111 for additional information. Any new reporting requirements will be communicated to Grantees in forthcoming WPNs and memoranda, where applicable. Training and technical assistance will be provided as needed.~~

~~Please refer to Weatherization Memorandum 128 for specific information related to new reporting requirements.~~

In accordance with [2 CFR 200.334](#), Retention requirements for records: “Unless required by statute, DOE shall place no restrictions on recipients that limit public access to the records of recipients that are pertinent to an award, except when DOE can demonstrate that such records shall be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) if the records had belonged to DOE.” DOE would be legally required, pursuant to 5 U.S.C. 552(b)(6), of the Freedom of Information Act, to keep confidential any specifically identifying information related to an individual's eligibility application for WAP, or the individual's participation in WAP, such as name, address, or income information. Thus, Grantees and Subgrantees should extend that same protection to their client records for WAP. States may release information about recipients in the aggregate which does not identify specific individuals. For example, information on the number of recipients in a county, city or a zip code does not compromise the privacy of the recipients.

DOE adheres to the transparency requirements placed on these and other government financial assistance programs instituted by the administration. DOE will work diligently with any WAP Grantee or Subgrantee to gather the required information and provide it to the requestor. However, DOE must comply with all requirements of the government to protect the privacy interests of individuals who participate in these financial assistance programs.

5.0 WEATHERIZATION PROGRAM NOTICES (WPN) AND MEMORANDA:

DOE-developed documents, WPNs, Memorandums and other relevant policy documents, are available at [Weatherization Assistance Program | Department of Energy](#).

The GovDelivery distribution list alerts the WAP network when new WPNs, Memorandums, and/or Training Resources are uploaded to WAP's website. Interested recipients should complete the form located at [DOE Office of State and Community Energy Programs \(govdelivery.com\)](#).

GovDelivery emails will arrive in your inbox via the following address:
doe-wapta@public.govdelivery.com.

Active WPNs applicable to formula grants in effect at the time of WPN 25-1 issuance provide program required guidance, which address specific policy areas that must be adhered to by all Grantees and Subgrantees operating weatherization programs using DOE funds. Grantees are reminded additional WPNs may be issued that are "in effect as of the date stated in the WPN." DOE will continue to send notices electronically and post them to DOE's website to ensure all Grantees have access.

The table below is organized by WPN number, title, and effective date of issuance.

In addition, the WAP memorandum process established a uniform communication mechanism to notify Grantees of upcoming events, clarify elements of existing WPNs, and provide opportunity for comment by the network on administrative direction and impact of future policies. Active Memoranda are listed following the WPNs.

Weatherization Program Notice	Title	Date Issued
10-12	Historic Preservation Implementation	2/11/10
11-3	Policy Regarding the Use of DOE Program Funds to Pay for Call-Back/Add-On Work After Reported to DOE as a Completed Unit	12/15/10
17-6	Property Acquired Under the Weatherization Assistance Program Including Vehicle and Equipment Purchases	07/27/17
19-5	Incidental Repair Measure Guidance	09/06/19
19-6	DOE Guidance for Completing Recipients' Annual Historic Preservation Report	09/09/19
20-4	Weatherization Assistance Program Monitoring Procedures	01/22/20

Weatherization Program Notice	Title	Date Issued
21-4	Closeout Procedures for Grants Under the Weatherization Assistance Program - Revised	03/24/23
22-4	Quality Work Plan Requirement Update	12/13/21
22-5	Expansion of Categorical Eligibility	12/08/21
22-7	Weatherization Health and Safety	12/15/21
22-8	Streamlining the Energy Audit Process—Optional Regional Weatherization Priority Lists	07/01/22
22-9	Managing Multiple Funding Streams within the Weatherization Assistance Program	06/24/22
22-10 Revised	Including Non-Energy Impacts within the Weatherization Assistance Program	10/21/22
22-11	WAP Modification Guidance for Sustainable Energy Resources for Consumers (SERC) Grants	08/26/22
22-12	Multifamily Weatherization	09/14/22
22-13	Weatherization of Rental Units	09/14/22
23-1	Grant Application	12/16/22
23-2	Grantee Allocations	02/03/23
23-3	2023 Federal Poverty Guidelines and Definition of Income	02/03/23
23-4	Weatherization Readiness Funds—Expansion of Scope	01/27/23
23-6	Revised Energy Audit Approval Procedures, Related Audit and Material Approvals Including Fuel-Switching and Solar PV	03/03/23
23-7	Weatherization Assistance Program (WAP) Modification Guidance for Sustainable Energy Resources for Consumers (SERC) Grants	06/21/23
23-9	Weatherization Assistance Program Enhancement & Innovation Monitoring	09/20/23
24-1	Program Year 2024 Weatherization Grant Application	11/17/23
24-2	Weatherization Program Notice 24-2 Program Year (PY) 2024 Grantee Allocations	04/10/24

Weatherization Program Notice	Title	Date Issued
<u>24-3</u>	<u>2024 Federal Poverty Guidelines and Definition of Income</u>	<u>01/25/24</u>
<u>24-4</u>	<u>Weatherization Assistance Program Monitoring Procedures</u>	<u>05/10/24</u>
<u>24-5</u>	<u>Solar Photovoltaic (PV) System Warranties</u>	<u>11/28/23</u>
<u>24-6</u>	<u>Vehicle and Equipment Purchases and Disposition Using Weatherization Assistance Program Funds</u>	<u>01/25/24</u>
<u>24-7</u>	<u>Optional Budget Flexibilities for the Average Cost Per Unit</u>	<u>05/10/24</u>
<u>24-8</u>	<u>E&I Policy and Reporting Revised</u>	<u>09/23/24</u>
<u>24-9</u>	<u>Weatherization Readiness Fund - Implementation</u>	<u>09/19/24</u>
<u>24-11</u>	<u>Weatherization Assistance Program Guidance for SERC Grants</u>	<u>09/25/24</u>

Weatherization Program Notices can be accessed via the following link: [Weatherization Program Notices and Memorandums | Department of Energy](#).

Memorandum	Title	Date Issued
008	Quality Management Plan Draft Grantee KSAs	09/17/14
047	WAP PY18 Average Cost Per Unit Correction	02/26/19
063	Historic Preservation Prototype Programmatic Agreements Amendment Process	07/01/20
066	Historic Preservation Prototype Programmatic Agreements Amendment	08/10/20
099	Eligible Buildings - US Department of Agriculture Lists	11/09/22
104 <u>Revised</u>	Weatherization Assistance Program "Build America, Buy America" Requirement <u>Weatherization Assistance Program "Build America, Buy America" Requirement</u>	05/18/02/23/24

<u>109 Revised</u>	<u>Eligible Buildings—U.S. Department of Housing and Urban Development (HUD) Lists</u> <u>Eligible Buildings - U.S. Department of Housing and Urban Development (HUD) Lists</u>	<u>9/29/23</u> <u>12/15/24</u>
110	Historic Preservation Review Process for Utilizing Weatherization Assistance Program (WAP) Funds on Tribal Lands	08/16/23
111	Weatherization Assistance Program Data Collection Updates—REVISED	08/21/23
112	Notice of Intent (NOI) to Release a Funding Opportunity for Sustainable Resources for Consumers (SERC) Grants Under the Bipartisan Infrastructure Law (BIL)	08/21/23
113	Weatherization Assistant Suite of Tools and Transition Requirement Updates	08/29/23
114	Updates to WAP Optional Regional Priority Lists	09/8/23
115	Weatherization Procurement Resources	09/6/23
<u>121</u>	<u>Announce the Recipients of Program Year (PY) 2023 Sustainable Energy for Consumers (SERC) Awards</u>	<u>12/21/23</u>
<u>123</u>	<u>Discount Rate for Cost-Effectiveness Calculations</u>	<u>02/13/24</u>
<u>126</u>	<u>Home Energy Professional (HEP) Energy Auditor and Quality Control Inspector (QCI) Certification Scheme Update</u>	<u>03/22/24</u>
<u>128</u>	<u>Weatherization Assistance Program New Data Collection Requirements Starting Program Year 2024</u>	<u>05/20/24</u>
<u>133</u>	<u>EA and QCI Certification Body Update</u>	<u>06/28/24</u>
<u>134</u>	<u>WAP Enhancement & Innovation Funding Opportunity Announcement (DE-FOA-0003407) - REVISED</u>	<u>09/18/24</u>
<u>135</u>	<u>Bipartisan Infrastructure Law (BIL) WAP Sustainable Energy Resources for Consumers (SERC) Selections</u>	<u>08/21/24</u>
<u>136</u>	<u>Quality Work Plan-Multifamily Training Requirements</u>	<u>09/09/24</u>

<u>137</u>	<u>Transfer of RED Calc Free and RED Calc Pro to Department of Energy</u>	<u>09/11/24</u>
<u>138</u>	<u>Program Year 2025 Weatherization Assistance Program Draft Grant Guidance</u>	<u>10/18/24</u>

Weatherization Program Memorandums can be accessed via the following link: [Weatherization Program Notices and Memorandums | Department of Energy](#).

6.0 WEBSITE INFORMATION

[Weatherization Assistance Program | Department of Energy](#) contains the most up-to-date information related to governing documents, Program information, communication information, client eligibility, and technical and management resources.

CONCLUSION: On behalf of DOE, we thank the WAP network for its dedication to the low-income households we serve across the country. As we work to implement WAP under both annual and BIL funding, it is an exciting and busy time for all levels of the Program. Thank you for being a part of this effort.

David Gipson
WAP Deputy Director
Office of State and Community Energy Programs

Attachment 1: PY 2025 Administrative and Legal Requirements Document (ALRD)

Attachment 2: PY 2025 Application Instructions (November 2024)

Attachment 3: NEPA Allowable Activities (to be included with final guidance)