



Leveraging and Collaboration Models in WAP

NASCSPP WINTER TRAINING
CONFERENCE | Arlington, VA 2025



Presenters

Winter Training Conference | Feb 3 – Feb 7, 2025



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Session Overview

Federal Coordination

Braiding Leveraged Funds

Discussion

LIHEAP and Weatherization


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Federal Program Coordination

Interagency Collaboration

1984: DOE and HHS (LIHEAP) began collaborating on eligibility requirements.



2010: DOE and HUD signed Memorandum of Understanding to explore alignment and streamline services.



2019: Congress directed DOE to collaborate with partners at HHS, HUD, and other agencies.



2022: Collaboration expanded to include USDA.



2024: MOU signed by DOE, HHS, HUD and USDA.

Memorandum Of Understanding

PURPOSE

- Coordinating and improving the efficiency and effectiveness of federal weatherization and home energy retrofits.
- **Collaboration Areas:**
 - ▶ Data sharing
 - ▶ Property Lists
 - ▶ Braiding Federal Funding and Aligning Federal Processes
 - ▶ Referral Processes
 - ▶ Workforce Development
 - ▶ Cross-Program Training
 - ▶ Promotion and Outreach
 - ▶ Increase Multifamily Weatherization



WAP PY 2022 Funding Report

- NASCSP surveys the WAP Grantees each year and works with NCAP to provide a comprehensive summary report of WAP funding.
- It catalogues the amount and sources of funding available as of PY 2022 and some production of the WAP Grantees.
- 51 of 56 Grantees voluntarily responded to the NASCSP funding survey in PY 2022.

Increasing Energy Efficiency ~ Increasing Health & Safety

WEATHERIZATION ASSISTANCE PROGRAM

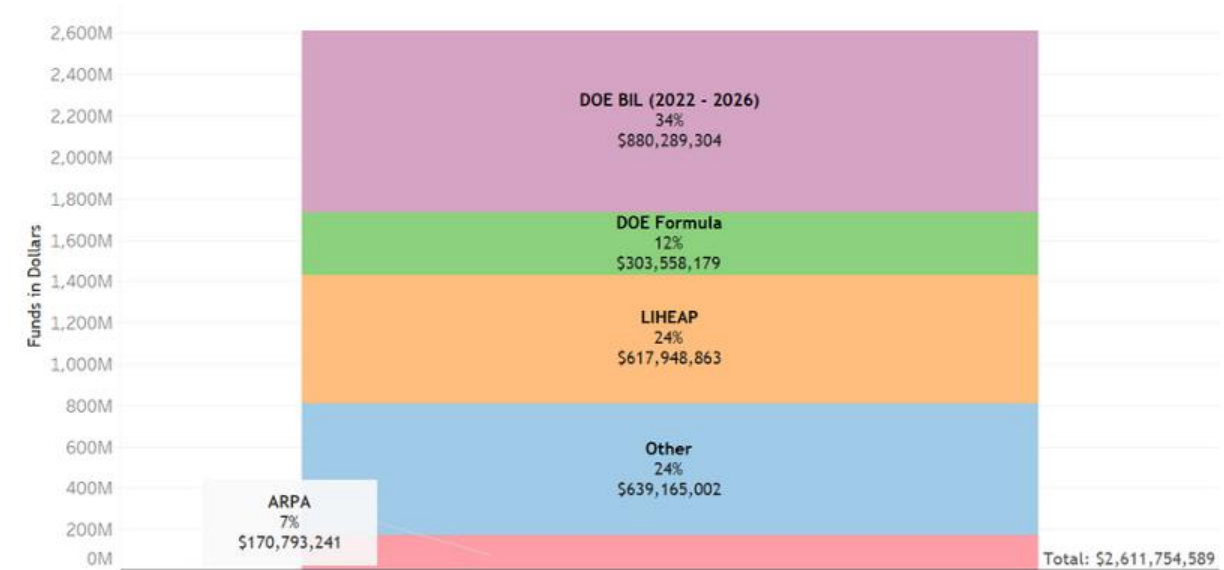
FUNDING REPORT
PROGRAM YEAR
2022



WAP Funding By Sources

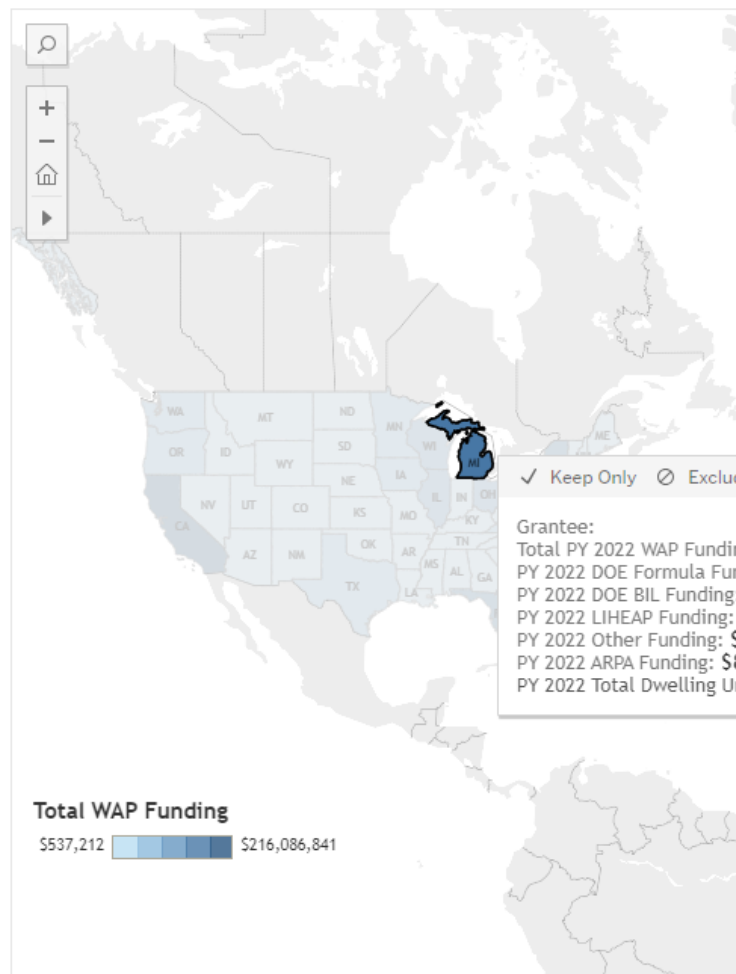
- NASCSP PY 2022 Survey collected data on five WAP funding sources
- Total of **\$2.6B**
- **68,968** units Weatherized

Figure 1: WAP Funding by Source 2022

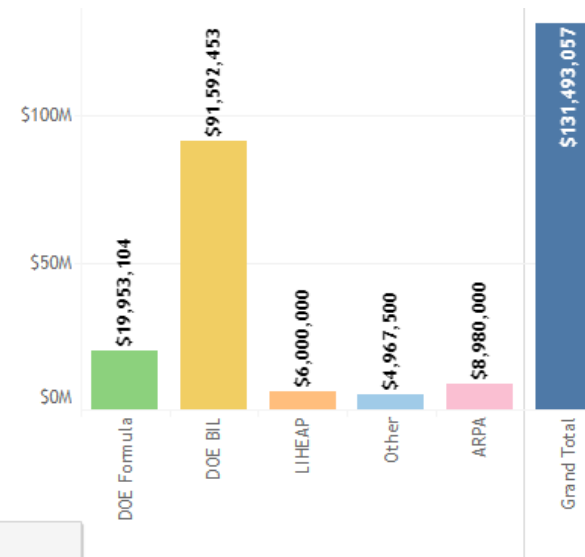


Interactive Annual Funding Dashboard

PY 2022 WAP Funding



Amount of Funding



✓ Keep Only ✗ Exclude 🔍 ☰

Grantee: **Michigan**
Total PY 2022 WAP Funding: **\$131,493,057**
PY 2022 DOE Formula Funding: **\$19,953,104**
PY 2022 DOE BIL Funding: **\$91,592,453**
PY 2022 LIHEAP Funding: **\$6,000,000**
PY 2022 Other Funding: **\$4,967,500**
PY 2022 ARPA Funding: **\$8,980,000**
PY 2022 Total Dwelling Units Completed: **1,493**



1,493
houses weatherized

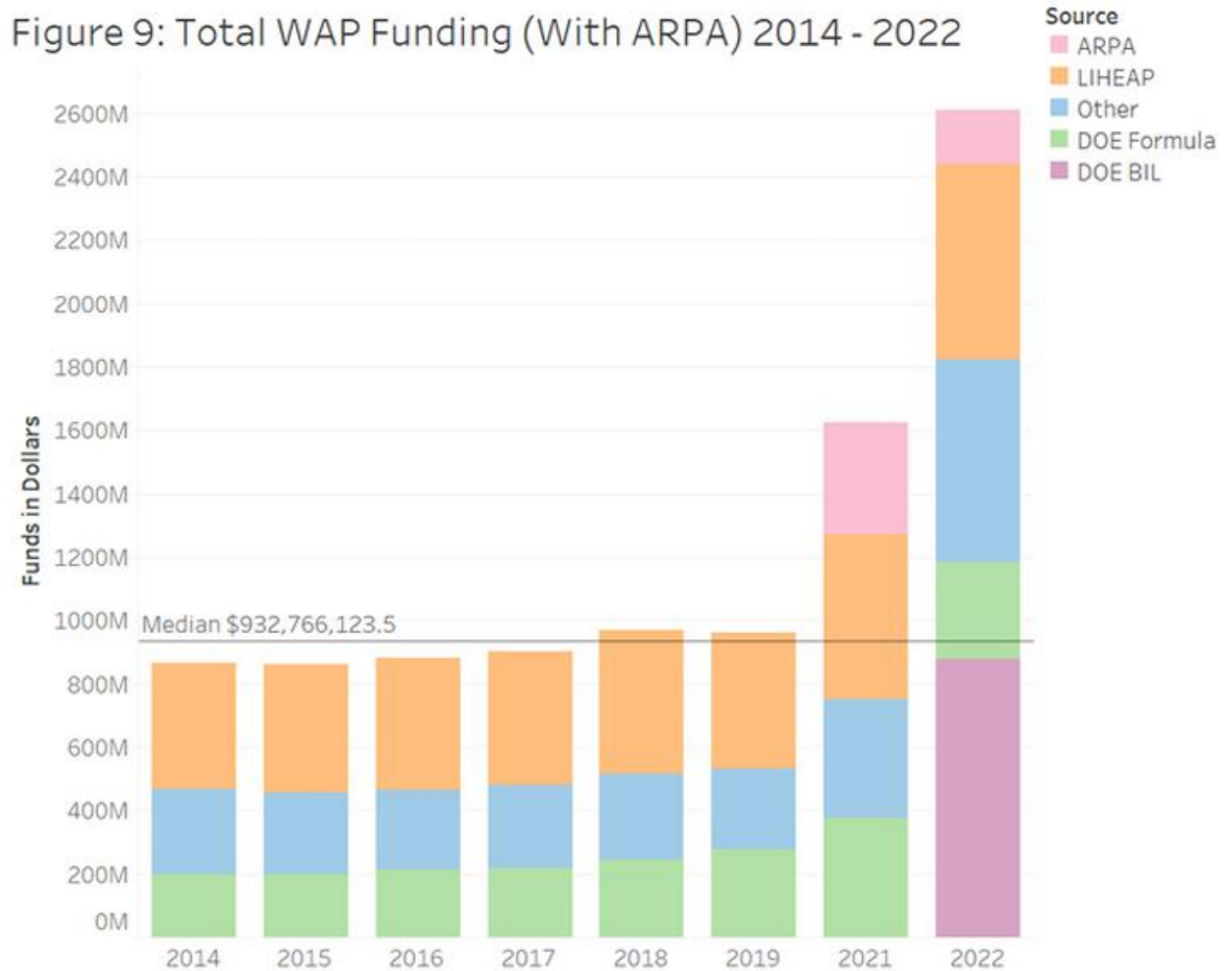
WAP Funding by Sources

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Weatherization is funded by a number of sources, including:

- DOE Formula
- DOE BIL
- LIHEAP
- ARPA
- Other (HUD, USDA, EPA, State, Utility, Misc., etc.)

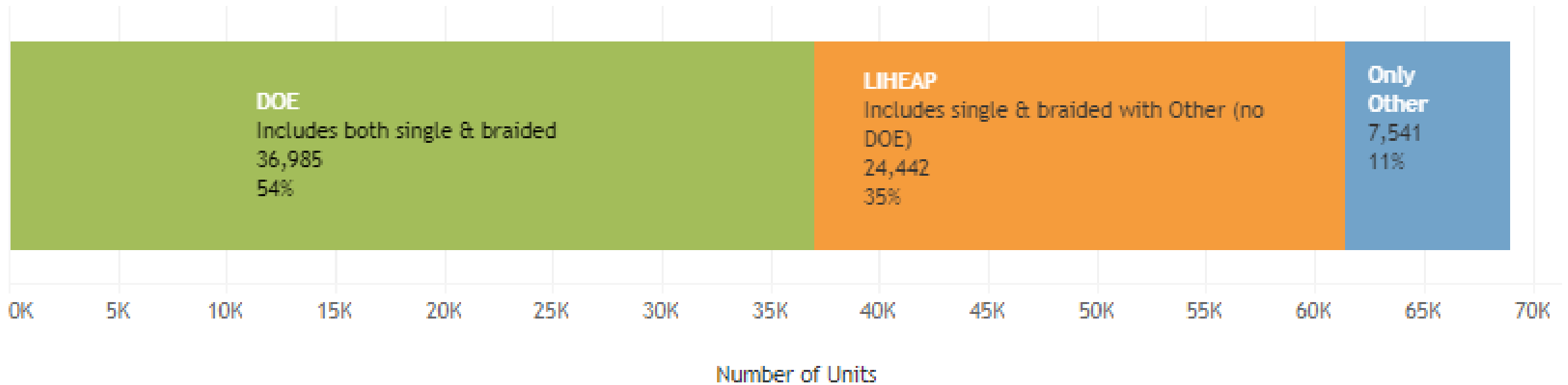
Figure 9: Total WAP Funding (With ARPA) 2014 - 2022



Braided Production

- 88% Grantees reported braiding funds in PY 2022.

PY 2022 National Production by Funding Source



Inter-Agency Collaboration Successes

DOE WAP expanded client eligibility to provide HUD categorical eligibility for single and multifamily housing ([WPN 22-5](#)).

DOE WAP developed guidance on braiding resources to better facilitate cross program coordination ([WPN 22-9](#)).

DOE WAP coordinated with agencies to publish both HUD eligible property lists and USDA eligible property lists for subgrantee use ([Memo 109](#) and [WPN 25-4](#)).

DOE & HUD coordinated a pilot to pair Section 3 workers with WAP Subgrantees, providing a referral system for WAP Subgrantees to hire people living in public housing.

Increased adoption of language in DOE and LIHEAP plans by grant recipients that allow for more flexibility to address energy efficiency measures.

Increased collaboration at the federal level around healthy homes and weatherization.

DOE WAP expanded client eligibility to provide categorical eligibility to USDA clients of programs with income requirements below 80% AMI ([WPN 25-4](#)).

Healthy Homes and Weatherization Cooperation Demonstration Grants.

Various co-presenting to increase awareness of federal programs.

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Braiding Leveraged Funds

Program Rules & Guidance

10 CFR 440.1 – Purpose and Scope

- “To increase the energy efficiency of dwellings owned or occupied by low-income persons or to provide such persons renewable energy systems or technologies, reduce their total residential expenditures, and improve their health and safety.”

10 CFR 440.21(d) – Energy Audit Procedures

- Except for materials to eliminate health and safety hazards, each individual weatherization material and package of weatherization materials installed in an eligible dwelling unit must be cost-effective.

Braiding: Flexibility provided while remaining compliant with DOE rules

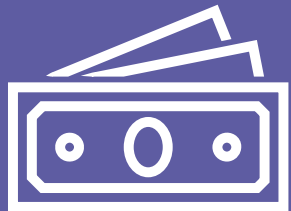
- Leveraged funds can pay for measures with SIR <1.0.
- WPN 22-9 provides guidance on managing multiple funds in weatherization.

Leveraged Funding in WAP



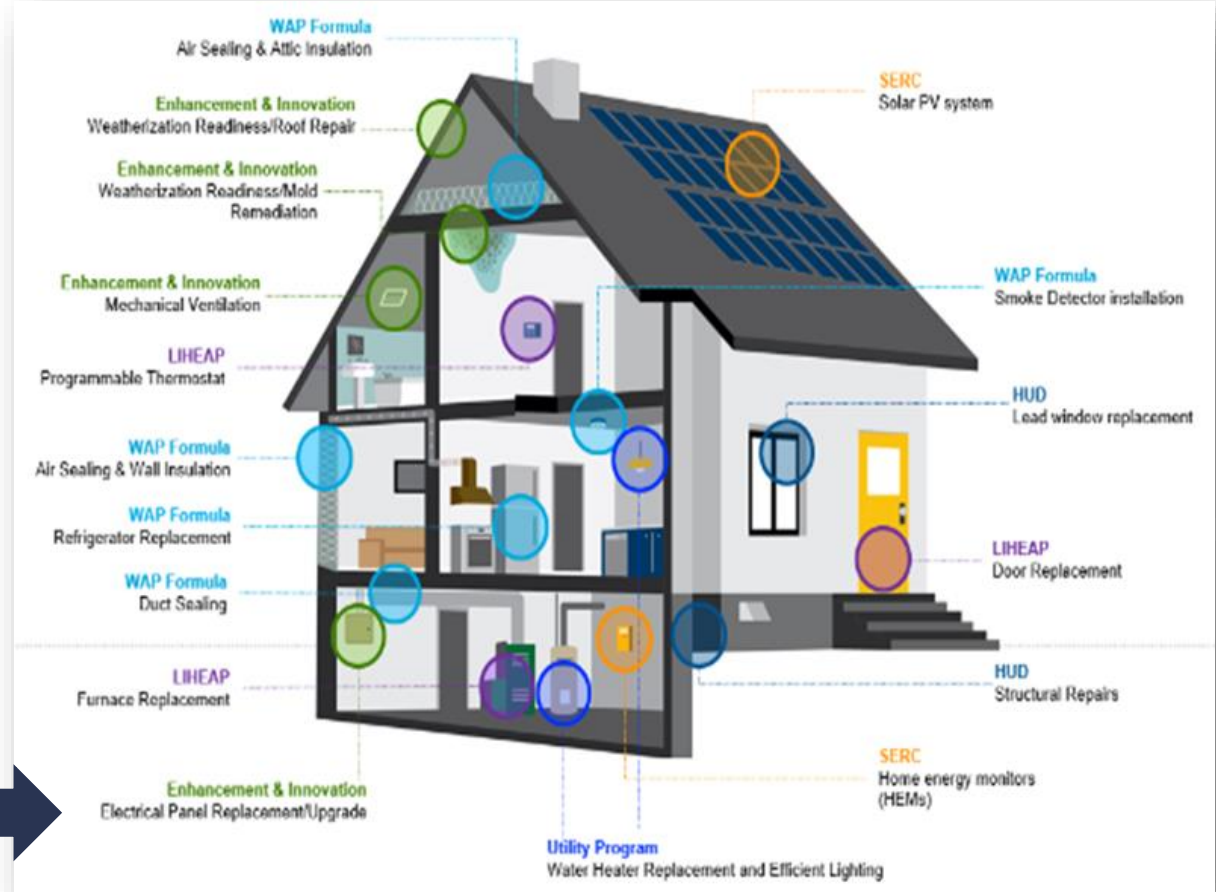
LEVERAGING ACTIVITIES:

Activities that support securing and administering non-DOE funding for weatherization



LEVERAGED FUNDING:

Federal and non-federal funding secured to supplement DOE WAP



BRAIDING FUNDS:

Utilizing two or more funding sources on a job. Each funding source can be isolated from all others in financial/accounting and reporting systems.

Leveraging Activities

According to WPN 22-9:

Up to 15% of the DOE allocation can be used for leveraging activities (10 CFR 440.14(c)(6)(xiv)) including:

- Holding meetings
- Facilitating matching funds
- Negotiating contracts, MOUs, etc.
- Developing program design
- Providing technical assistance

Grantees are encouraged to generate at least one non-Federal leveraging dollar for every DOE dollar expended.

Grantee Leveraging Activities

Funds retained at state/territory for oversight and administration of activities.

Subgrantee Coordination

Funds provided to a Subgrantee or other organization that serves as an administrative agent and coordinates leveraging activities on behalf of all Subgrantees.

Subgrantee Allocations

Funding provided to each Subgrantee to support administrative costs for leveraging activities.



Rules For Reporting Units

Requirements for DOE Units:

- ▶ Household is income eligible (e.g., 200% federal poverty level).
- ▶ Dwelling is eligible (e.g., type of structure included in DOE Grantee Plan)
- ▶ Savings to Investment Ratio (SIR)
 - ▶ Cumulative SIR 1.0 or greater
 - ▶ Measures with DOE funding applied contain measure SIR of 1.0 or greater, or an approved priority list has been applied.
- ▶ Measures Installed
 - ▶ Can not skip conservation measures
 - ▶ Can not refuse necessary health and safety ventilation/IAQ measures

Allowable Braiding of Funds

WAP BIL Grants

Grantees can weatherize a home using WAP BIL grant funds WITH the following grants generated from BIL or Annual appropriations (if awarded):

- SERC Grant
- E&I Grant
- WRF

WAP Annual Grants

Grantees can weatherize a home using annual DOE WAP grant funds WITH the following grants generated from BIL or Annual appropriations (if awarded):

- SERC Grant
- E&I Grant
- CSPP Grant
- WRF



Allowable Braiding of Funds

Allowable Braiding of WAP Funds

- When DOE funds are braided, measures must be paid, in full, with a single DOE funding type and are not to be co-funded with multiple DOE WAP-funding types
- Co-funding measures with other fund sources (LIHEAP, utility funding, etc.) is allowed
- Costs must be documented in the file

Allowable Braiding of Weatherization Readiness Funds (WRF)

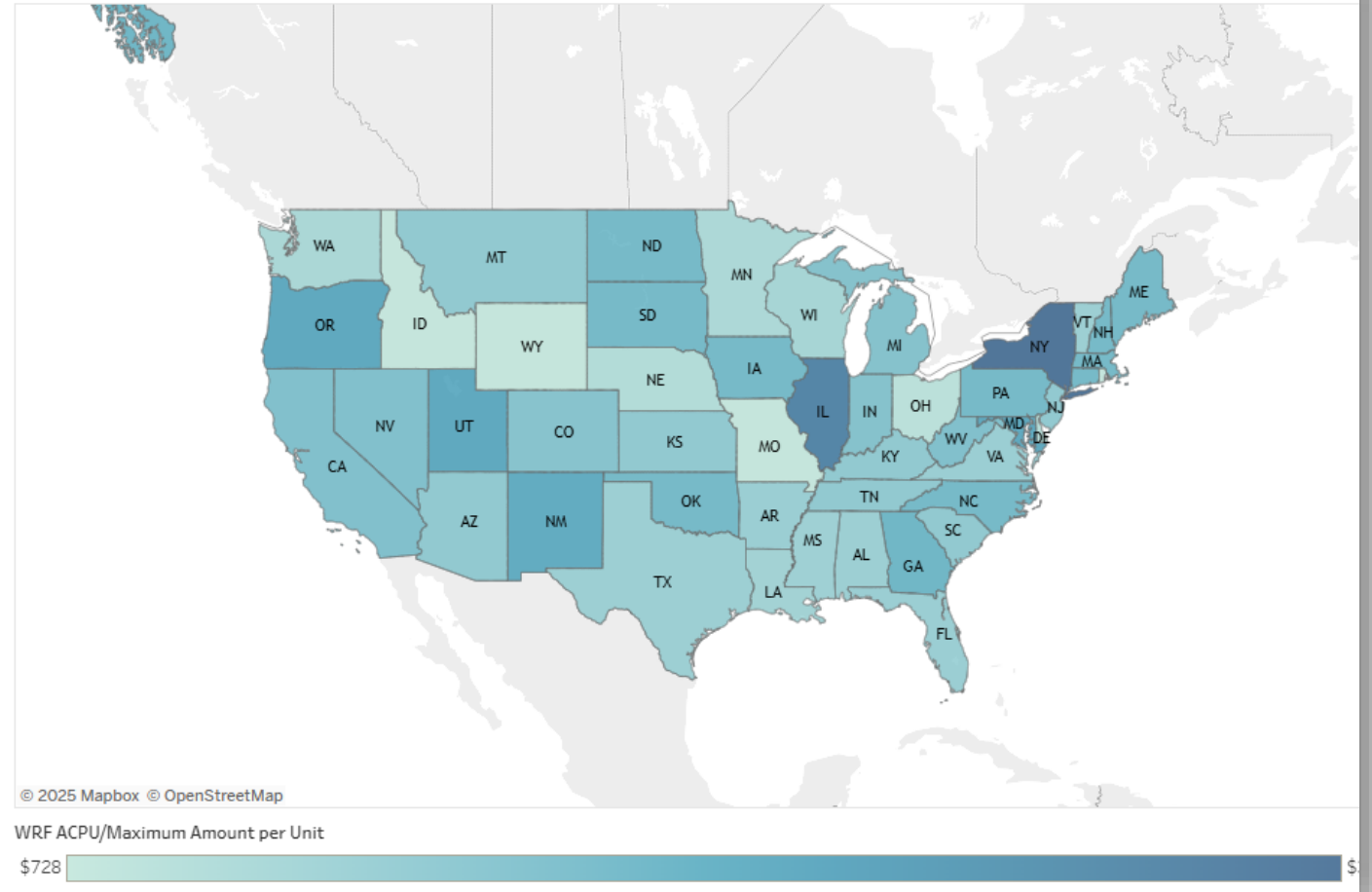
- Can be utilized in annual formula and BIL-funded WAP projects.
- Can be used to co-fund WRF measures
- Must result in a DOE dwelling unit completion as defined in -1
- Costs must be documented in the file.

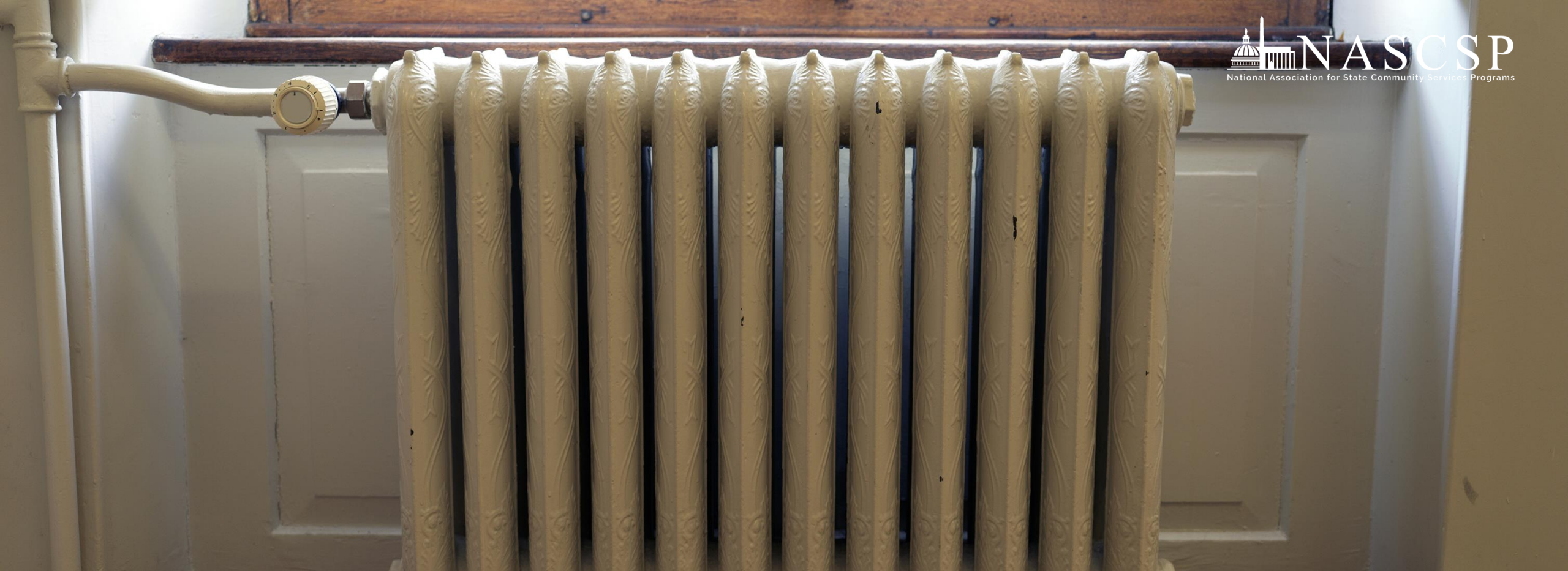


Weatherization Readiness Funds ACPU

- Of 55 Grantees, **28 Grantees (51%)** specified an **ACPU** for WRF.
- **21 Grantees (38%)** specified a max amount or “cap” for WRF.
- The median WRF ACPU/Max Expenditure was **\$11,000**.

PY 2023 Weatherization Readiness Funds (WRF) ACPU/Maximum Expenditure Per Unit





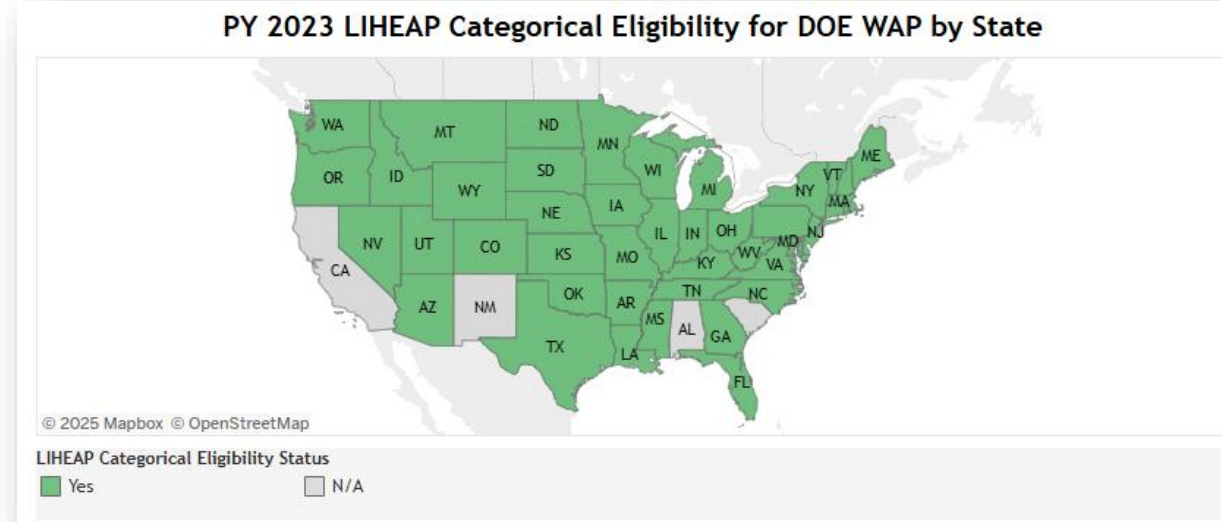
Streamlining with LIHEAP

Methods to Streamline Leveraging LIHEAP and WAP

- Include categorical eligibility in your WAP Grantee Plan
- Include all eligible measures your Subgrantees are likely to do in your WAP Grantee Plan and energy audit approval as well as your LIHEAP model plan. This includes energy efficiency measures, health and safety, weatherization readiness and renewables
- Include flexibility in LIHEAP model plan such as ACPU, Savings to Investment ratio, re-weatherization date, high H&S limits, etc.

LIHEAP Categorical Eligibility

- 10 CFR 440.22(a)(3): Allow inclusion of households that are income eligible for LIHEAP
 - 93% of Grantees implemented LIHEAP categorical eligibility.



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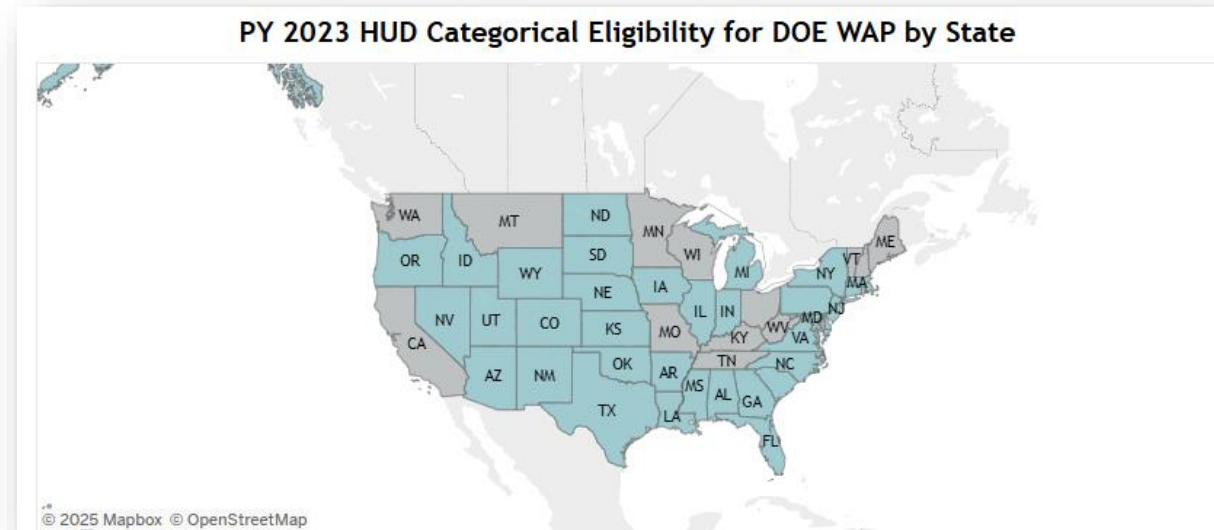


Streamlining with HUD

HUD Categorical Eligibility

WPN 22-5: Expanded WAP's categorical eligibility to include HUD means-tested programs

- **69%** of Grantees applied HD means-tested programs categorical eligibility.



Include categorical eligibility in your WAP Grantee plan

- Clients could come from:
 - Community Development Block Grant
 - Healthy Homes Production Grant
 - Lead Hazard Control Grant
 - *Multiple multifamily programs*
- Utilize HUD property lists ([WAP Memo 109](#)) to identify categorically eligible or potentially eligible buildings
- Find Healthy Homes Production or Lead hazard Control and Healthy Home Grantees to partner and apply for the Healthy Homes and Weatherization cooperation Demonstration grants

*Remember-categorical eligibility does not go both ways!
WAP accepts HUD clients in mean-tested programs 80%
Area Median Income or below.*

Methods to Streamline Leveraging WAP & HUD

Questions

- How do we build relationship between LIHEAP and WAP state administrators? WAP and HUD program administrators?
 - How is your collaboration currently going?
- How are Grantees managing their ACPU? Are you braiding with LIHEAP? Are you braiding with other WAP programs?
 - Are there opportunities for cross-training? How can DOE, HHS, or HUD help?

LIHEAP Transfer

Most LIHEAP grant recipients administer a LIHEAP weatherization program and transfer funds to a WAP grant recipient or subgrant agency.

- ▶ A LIHEAP grant recipients may allocate up to 15% of total LIHEAP funds to weatherization.
- ▶ A LIHEAP grant recipient may request a waiver from the U.S. Department of Health and Human Services (HHS) to increase the transfer amount up to a maximum of 25% of total LIHEAP funds.
- ▶ HHS can only approve waivers from April 1 – September 30

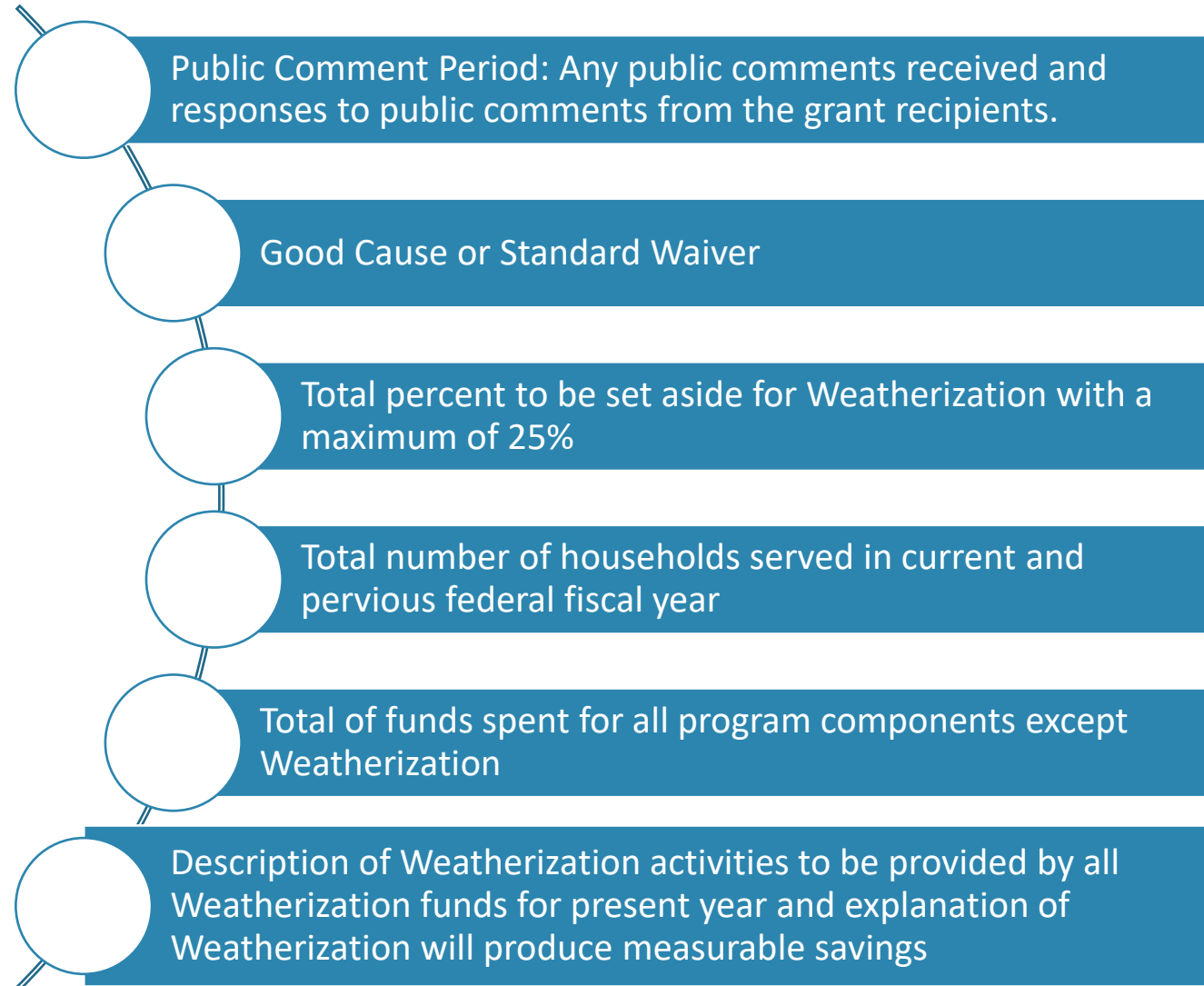
LIHEAP weatherization funds can be:

- Administered directly by the LIHEAP grant recipient, or
- Passed to another state agency, which administers the DOE Weatherization Assistance Program.



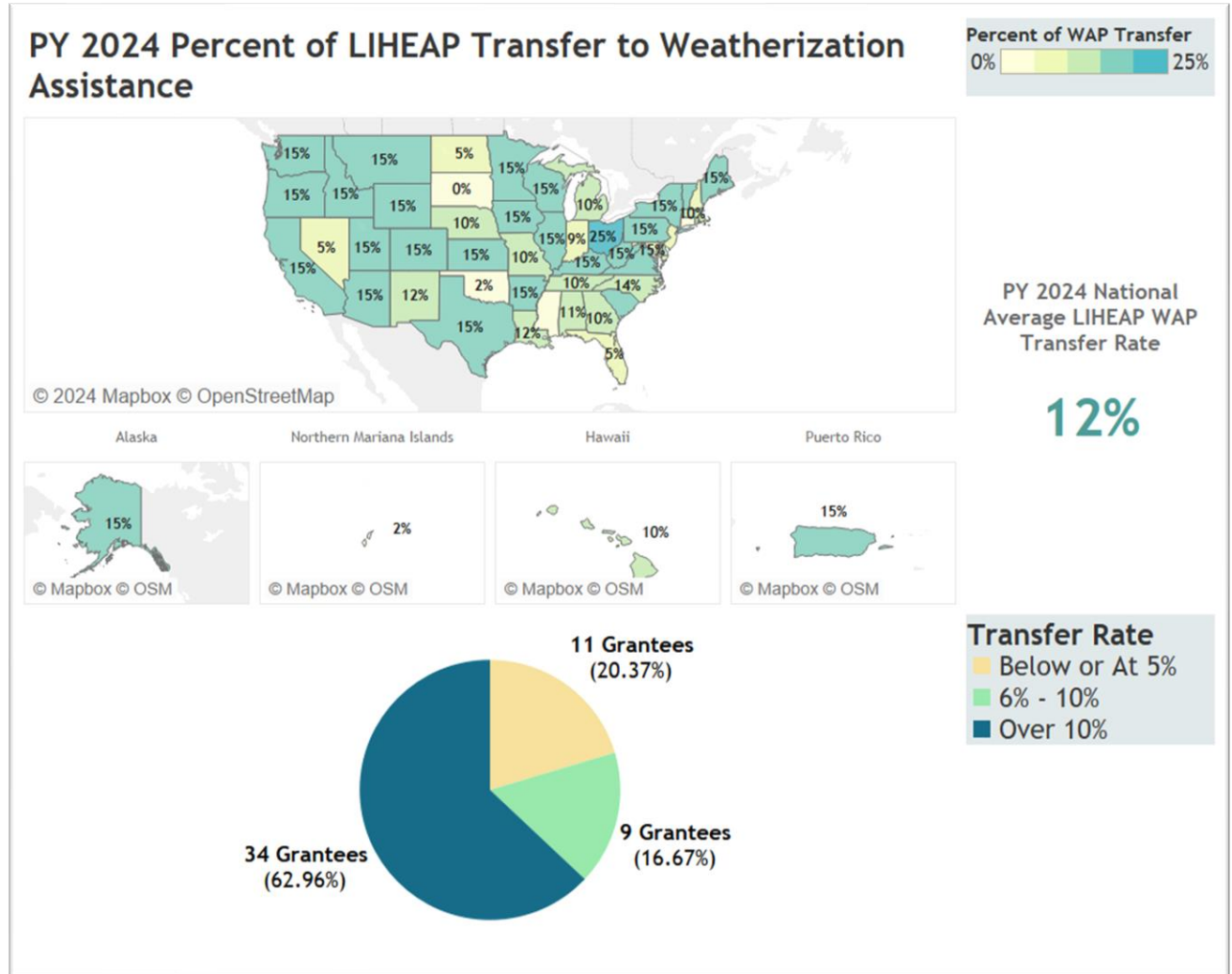
LIHEAP Weatherization Waiver Process

As outlined in [45 CFR 96.83](#), LIHEAP weatherization waivers must include:



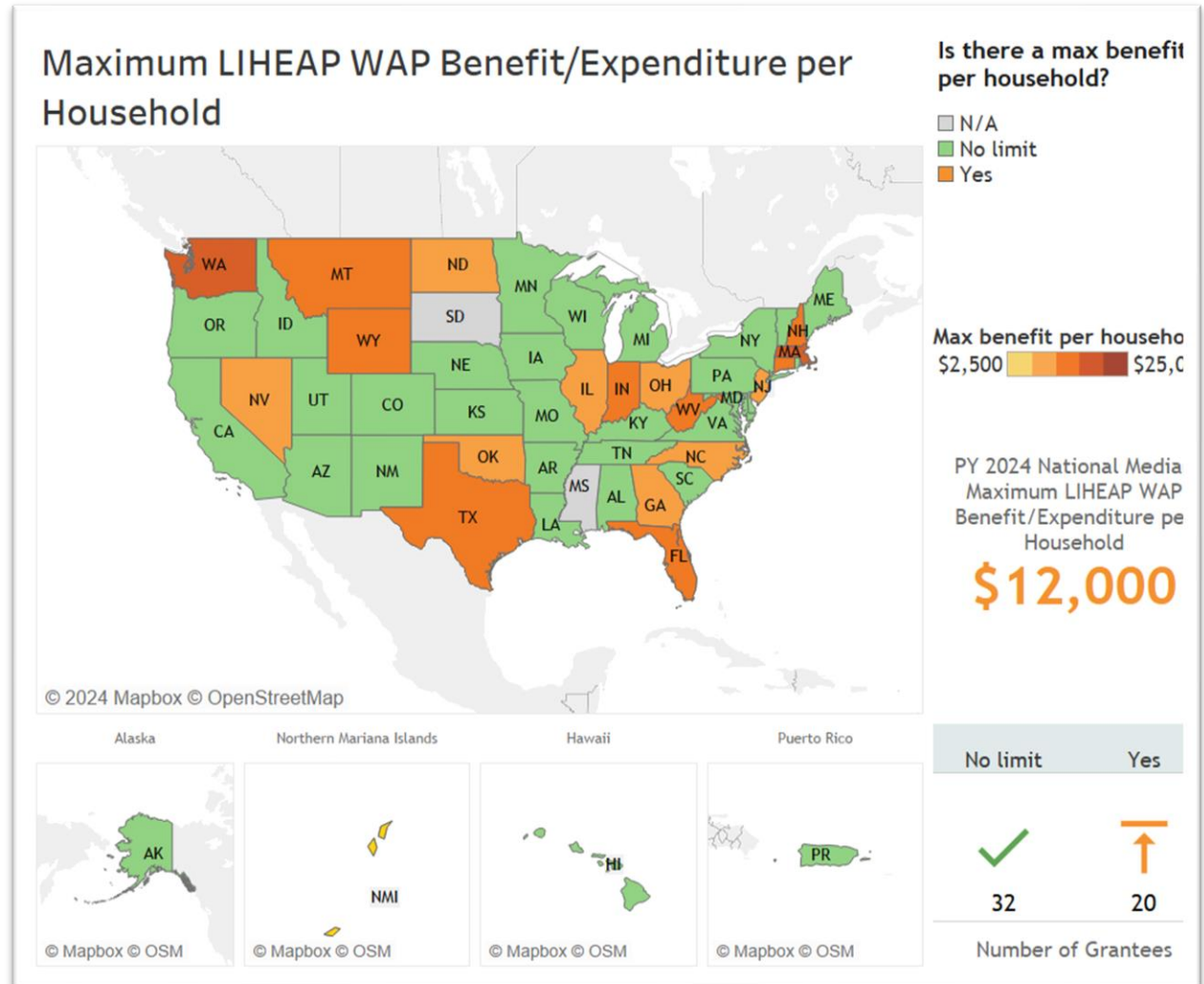
PY 2024 LIHEAP Transfer Rate

- ▶ 63% of Grantees transfer over 10% of their LIHEAP funds to WAP.
- ▶ PY 2024 National average LIHEAP WAP transfer rate is 12%.



Max LIHEAP WAP Benefit/Expenditure per Household

- 32 Grantees do not limit the amount of LIHEAP funds that can be expended per household.
- Of the 20 Grantees who specified a maximum LIHEAP benefit amount, the median amount is **\$12,000**.



LIHEAP Model Plan

Estimated Funding Allocation, 2604(C), 2605(k)(1), 2605(b)(9), 2605(b)(16) - Assurances 9 and 16		
1.2 Estimate what amount of available LIHEAP funds will be used for each component that you will operate: The total of all percentages must add up to 100%.	Percentage (%)	Prior year totals
Heating assistance	26.00%	26.00%
Cooling assistance	26.00%	26.00%
Summer crisis assistance	12.00%	24.00%
Winter crisis assistance	12.00%	0.00%
Year-round crisis assistance	0.00%	0.00%
Weatherization assistance	11.00%	11.00%
Carryover to the following federal fiscal year	2.00%	2.00%
Administrative and planning costs	10.00%	10.00%
Services to reduce home energy needs including needs assessment (Assurance 16)	1.00%	1.00%
Fees to develop and implement leveraging activities	0.00%	0.00%

Section 1: Program Components

LIHEAP Grant Recipients provide a Model Plan to HHS by September 1

- Section 1 of the LIHEAP Model Plan indicates the % of the LIHEAP funds to be transferred for weatherization.

5.2 Do you enter into an interagency agreement to have another government agency administer a WEATHERIZATION component? <input type="radio"/> Yes <input checked="" type="radio"/> No
5.3 If yes, name the agency and attach a copy of the Internal Agreement or Contract.
5.4 Is there a separate monitoring protocol for weatherization? <input checked="" type="radio"/> Yes <input type="radio"/> No
WEATHERIZATION - Types of Rules
5.5 Under what rules do you administer LIHEAP weatherization? (Check only one.)
<input type="checkbox"/> Entirely under LIHEAP (not DOE) rules
<input type="checkbox"/> Entirely under DOE WAP (not LIHEAP) rules
<input type="checkbox"/> Mostly under LIHEAP rules with the following DOE WAP rule(s) where LIHEAP and WAP rules differ (Check all that apply):
<input type="checkbox"/> Income Threshold

Section 5: Weatherization Assistance

Section 5 of LIHEAP Model Plan covers:

- Eligibility
- Rules
- Average Cost per Unit
- Type of LIHEAP Assistance (Allowable LIHEAP WAP measures)

LIHEAP Model Plan: Section 5

“Designate the Income Eligibility Threshold Used for the Weatherization Component.”

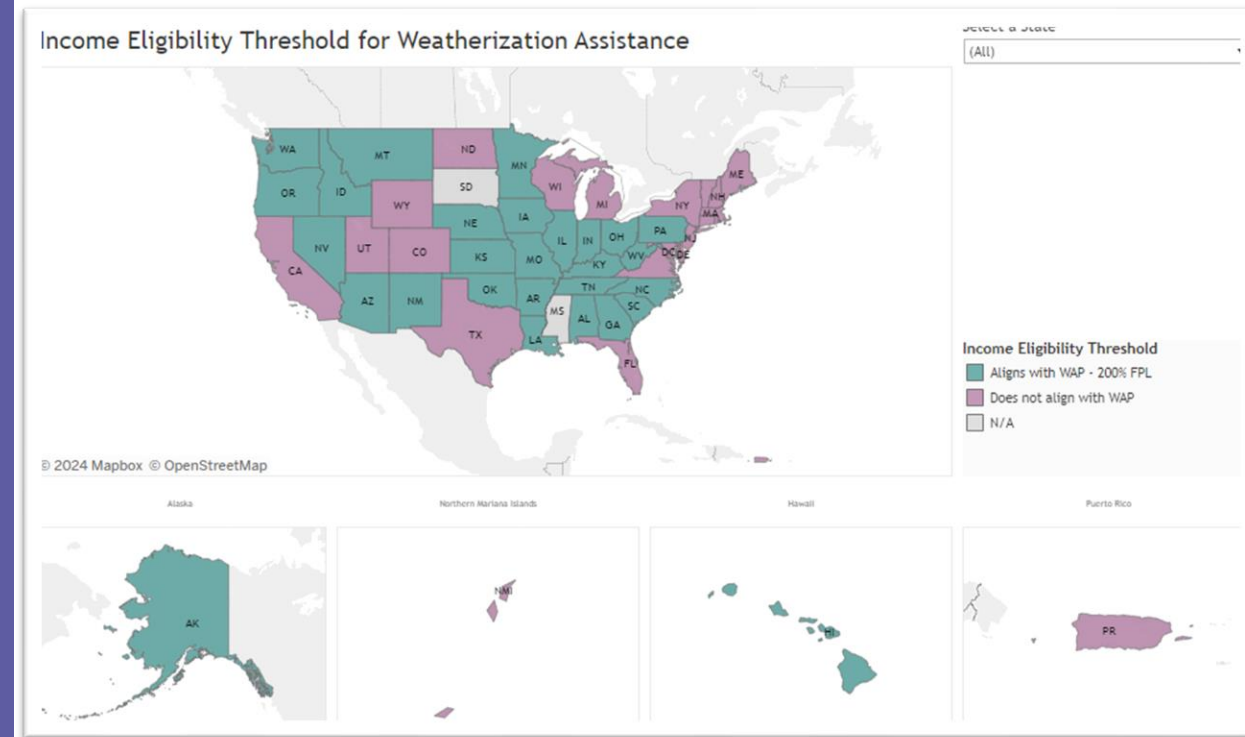
LIHEAP grant recipients may choose to remain at the LIHEAP eligibility threshold (up to 150% of Federal Poverty Guidelines, FPG) or align with DOE WAP.

- LIHEAP grant recipients often select 200%, to align with DOE WAP eligibility threshold.
- Some grant recipient select 60% of State Median Income (SMI).
- In all but 2 instances, grant recipients selecting 60% SMI, that dollar figure is above the 200% FPG.

(Note: DOE allows categorical eligibility. If a family qualifies for LIHEAP under the Grantee eligibility guidelines, they automatically qualify for WAP, even if that income threshold is above 200%.)

Income Eligibility

- Approximately 60% of Grantees designate the income eligibility threshold used for WAP.
- 200% of Federal poverty guidelines
- DOE WPN 24-3



LIHEAP Eligibility and Income Sources

Grant recipients provide what sources of income count as income in their LIHEAP Model Plan. Examples include but are not limited to:

- Self-Employment Income
- Unemployment
- Social Security
- Strike Pay
- Retirement
- TANF
- Cash Gifts
- Wages

For ease of coordination on income sources for eligibility consider aligning your LIHEAP income sources in the LIHEAP Model Plan with Weatherization Program Notice 24-3.

Section 5 - WEATHERIZATION ASSISTANCE

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES ADMINISTRATION FOR CHILDREN AND FAMILIES		August 1987, revised 05/92, 02/95, 03/96, 12/98, 11/01 OMB Clearance No.: 0970-0075 Expiration Date: 12/31/2023	
LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP) MODEL PLAN SF - 424 - MANDATORY			
Section 5: WEATHERIZATION ASSISTANCE			
Eligibility, 2605(c)(1)(A), 2605(b)(2) - Assurance 2			
5.1 Designate the income eligibility threshold used for the Weatherization component			
Add	Household Size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	200.00%
5.2 Do you enter into an interagency agreement to have another government agency administer a WEATHERIZATION component? <input type="radio"/> Yes <input checked="" type="radio"/> No			
5.3 If yes, name the agency:			
5.4 Is there a separate monitoring protocol for weatherization? <input checked="" type="radio"/> Yes <input type="radio"/> No			
WEATHERIZATION - Types of Rules			
5.5 Under what rules do you administer LIHEAP weatherization? (Check only one.)			
<input type="checkbox"/> Entirely under LIHEAP (not DOE) rules			
<input type="checkbox"/> Entirely under DOE WAP (not LIHEAP) rules			
<input type="checkbox"/> Mostly under LIHEAP rules with the following DOE WAP rule(s) where LIHEAP and WAP rules differ (Check all that apply):			
<input type="checkbox"/> Income Threshold			
<input type="checkbox"/> Weatherization of entire multi-family housing structure is permitted if at least 66% of units (50% in 2- & 4-unit buildings) are eligible units or will become eligible within 180 days			
<input type="checkbox"/> Weatherize shelters temporarily housing primarily low income persons (excluding nursing homes, prisons, and similar institutional care facilities).			
<input type="checkbox"/> Other - Describe:			
<input checked="" type="checkbox"/> Mostly under DOE WAP rules, with the following LIHEAP rule(s) where LIHEAP and WAP rules differ (Check all that apply.)			
<input type="checkbox"/> Income Threshold			
<input checked="" type="checkbox"/> Weatherization not subject to DOE WAP maximum statewide average cost per dwelling unit.			
<input checked="" type="checkbox"/> Weatherization measures are not subject to DOE Savings to Investment Ratio (SIR) standards.			
<input checked="" type="checkbox"/> Other - Describe:			
Retrofit - a dwelling may receive retrofit fifteen (15) years after the date previous weatherization work was completed.			
Energy related home repair - the use of LIHEAP weatherization funds is allowable for structural and ancillary repairs, such as roof, wall and floor repairs, only if the repairs are required to enable effective weatherization. These repairs will help ensure the health and safety of the units and help reduce the occurrence of deferrals due to the condition of the homes.			
Eligibility, 2605(b)(5) - Assurance 5			
5.6 Do you require an assets test? <input type="radio"/> Yes <input checked="" type="radio"/> No			
5.7 Do you have additional/differing eligibility policies for:			
Renters <input checked="" type="radio"/> Yes <input type="radio"/> No			
Renters living in subsidized housing <input checked="" type="radio"/> Yes <input type="radio"/> No			
5.8 Do you give priority in eligibility to:			
Elderly? <input checked="" type="radio"/> Yes <input type="radio"/> No			
Disabled? <input checked="" type="radio"/> Yes <input type="radio"/> No			

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LIHEAP Model Plan:

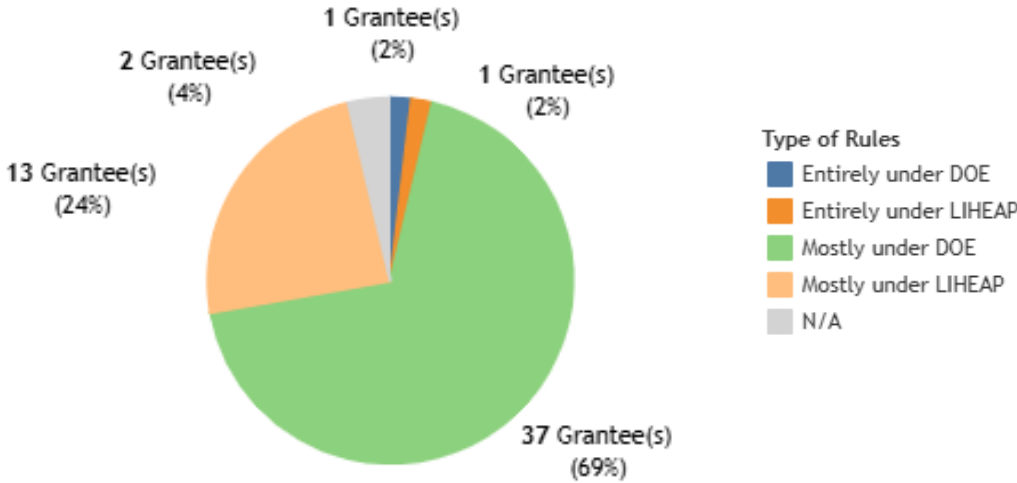
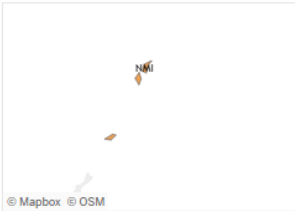
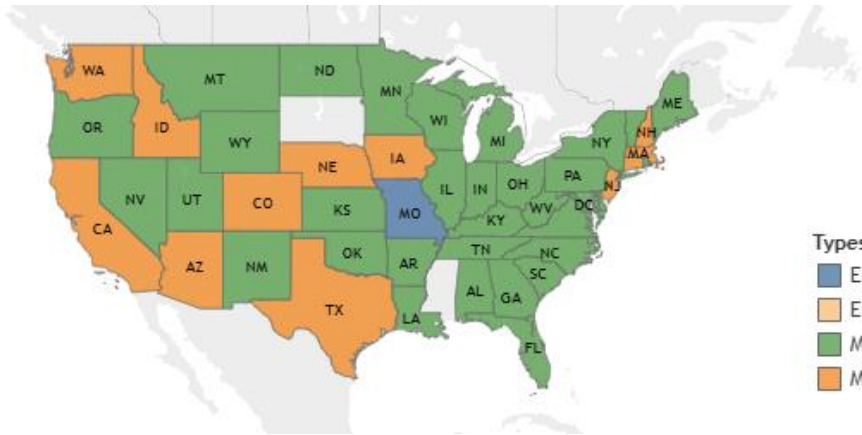
Section 5

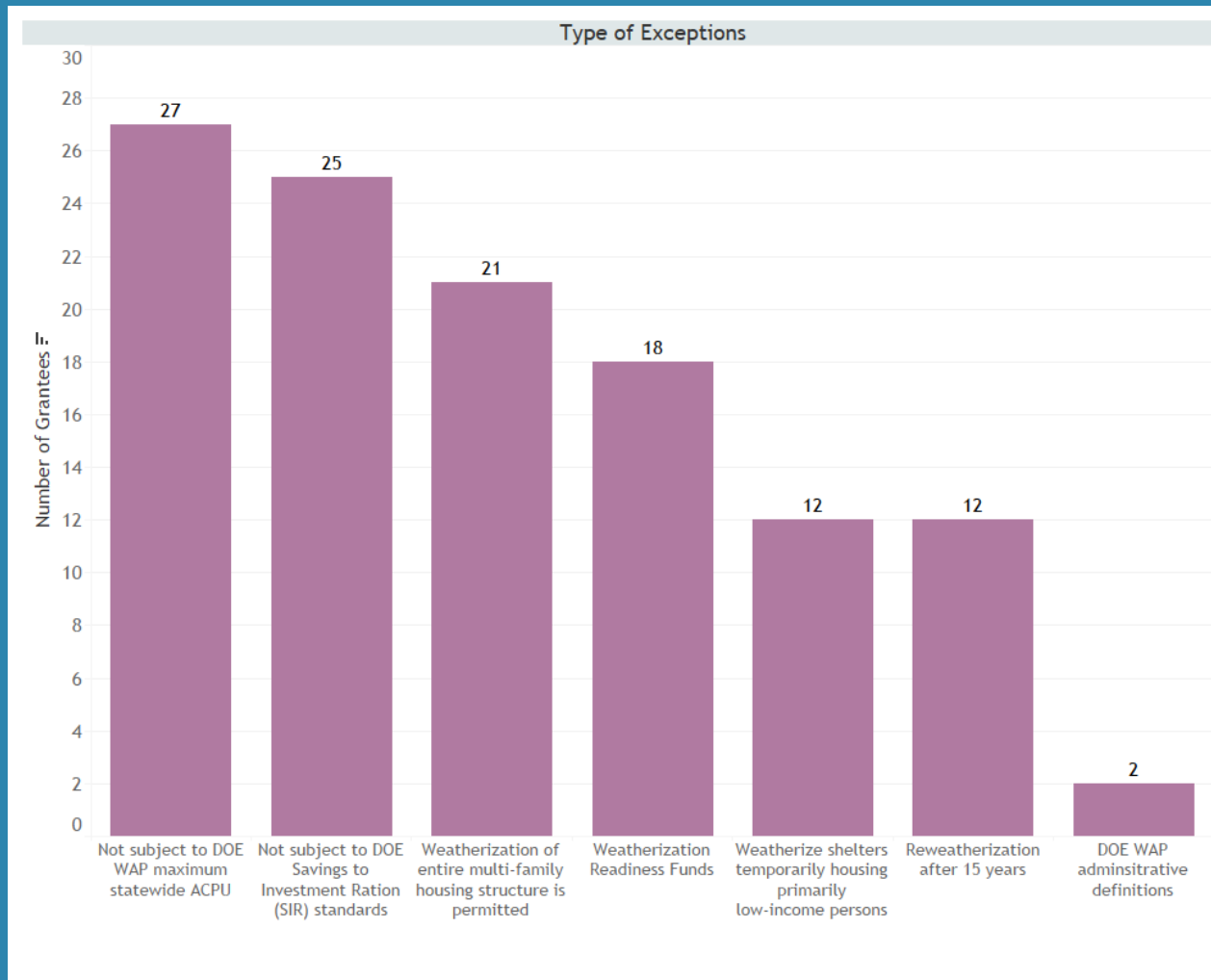
LIHEAP Model Plan outlines what rules the LIHEAP weatherization funding must follow:

- Entirely LIHEAP Rules
- Entirely DOE WAP Rules
- Mostly LIHEAP Rules
 - With option to identify pieces where they will follow DOE instead.
- Mostly DOE Rules
 - With option to identify pieces where they will follow LIHEAP instead.
- <https://liheapch.acf.hhs.gov/stateplans.htm>



FY 2024 LIHEAP WAP Rules



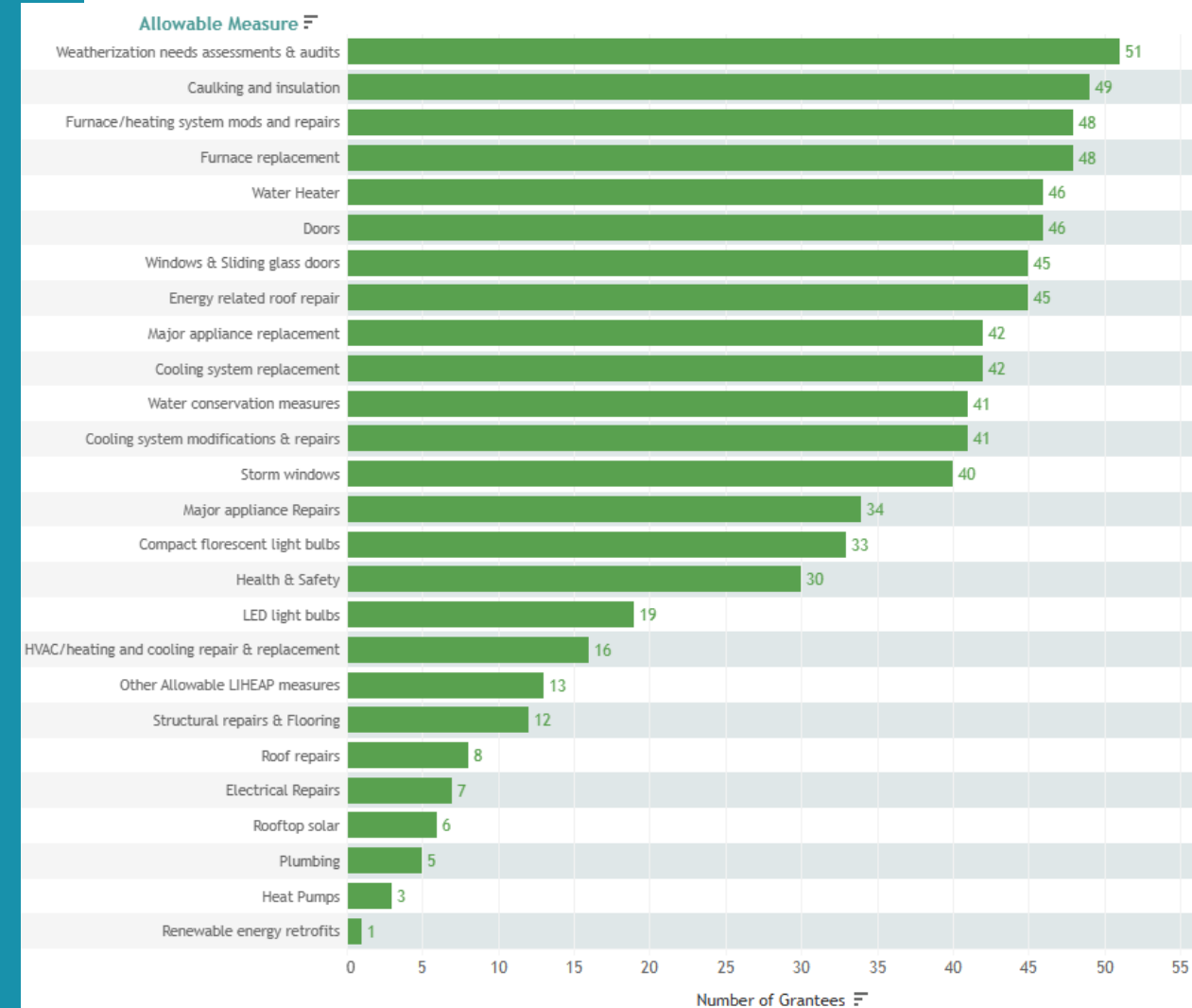


Common Exceptions

- Average cost per unit
- Savings to investment ratio
- Weatherization of entire MF housing structure is permitted
- Use of HHS funds to address healthy home issues and deferral remediation (Weatherization Readiness)

Benefits to Households & Programs

- Deeper retrofits allow for greater savings in energy cost reduction to low income families.
- Combining of funding sources provides much needed flexibility to state and local implementers to install both energy efficiency measures and address a myriad of health and safety issues.
- Combining LIHEAP and WAP funds compliments the federal purpose of both programs. LIHEAP does a good job at lowering energy burden and WAP does a good job at lowering energy used. When the funds are combined in one dwelling it has a powerful effect on the energy use and cost for a low income household.



LIHEAP Resources

- [LIHEAP website](#)
- [LIHEAP Clearinghouse](#)
- [LIHEAP State Model Plans](#)
- [LIHEAP State Contacts](#)
- [LIHEAP Federal Contacts](#)
- [NASCSP LIHEAP WAP Info & Resources](#)



LIHEAP Grant Recipient/ WHEAP Program at DEHCR

- Coordination of Energy Assistance (EA) & Wx
- Same Bureau Director with extensive Wx experience
- Wx Program referrals processed through EA referrals
- WHEAP agencies refer potential Wx customers through WI Home Energy Plus System

Wisconsin LIHEAP

15% LIHEAP
funds

- PY2024 ALLOCATION \$16.7 M

“Mostly
follows DOE
rules”

- SIR 0.8
- Braiding
- Prior Readiness program

Wisconsin State Utility

State Utility Funds

- Total SFY 2024 funding \$79 M
- Only HH within participating utilities territory
- SIR 0.8
- Braiding
- Readiness
- All Vehicle & Equipment purchases

Wisconsin ACPU

PY 2024 Average Cost Per Unit

- DOE ACPU
 - \$7,341.02 (954 units)
- BIL ACPU
 - \$6,737.15 (2,822 units)
- Total ACPU (all funding sources)
 - \$13,633 (5,131 total units)

Wisconsin BIL Plan

- 17 Subgrantees total
 - 14 receive BIL, 3 receive Formula
- Allows network to focus on one DOE funding source & braid with LIHEAP and Utility funds
- Helps with production
- Requested remaining 50% December 13, 2024
- Production BIL total 2,762 – 38.8%
 - Production goal 7,193


Leveraging & Collaboration Models in WAP




COLORADO
Energy Office
Weatherization Assistance Program

Stephanie Insinna-Sahondo, Colorado Energy Office
Director, Weatherization Assistance Program (WAP)
February 4, 2025





The Weatherization Assistance Program (WAP) empowers qualified Coloradans to save money, increase comfort, and better their homes and environment through proven energy conservation solutions.





Agenda

1 LIHEAP + Utility Funds

2 CO LIHEAP for WAP

3 CO WAP Utility Rebates

4 CO HB21-1105

LIHEAP + Utility Funds =

**Greater
Reduction in
Energy Bills**

**Rooftop
Solar**

**More
Health &
Safety**

Innovation!

**Workforce
Development**

Electrification

**WAP
Readiness**

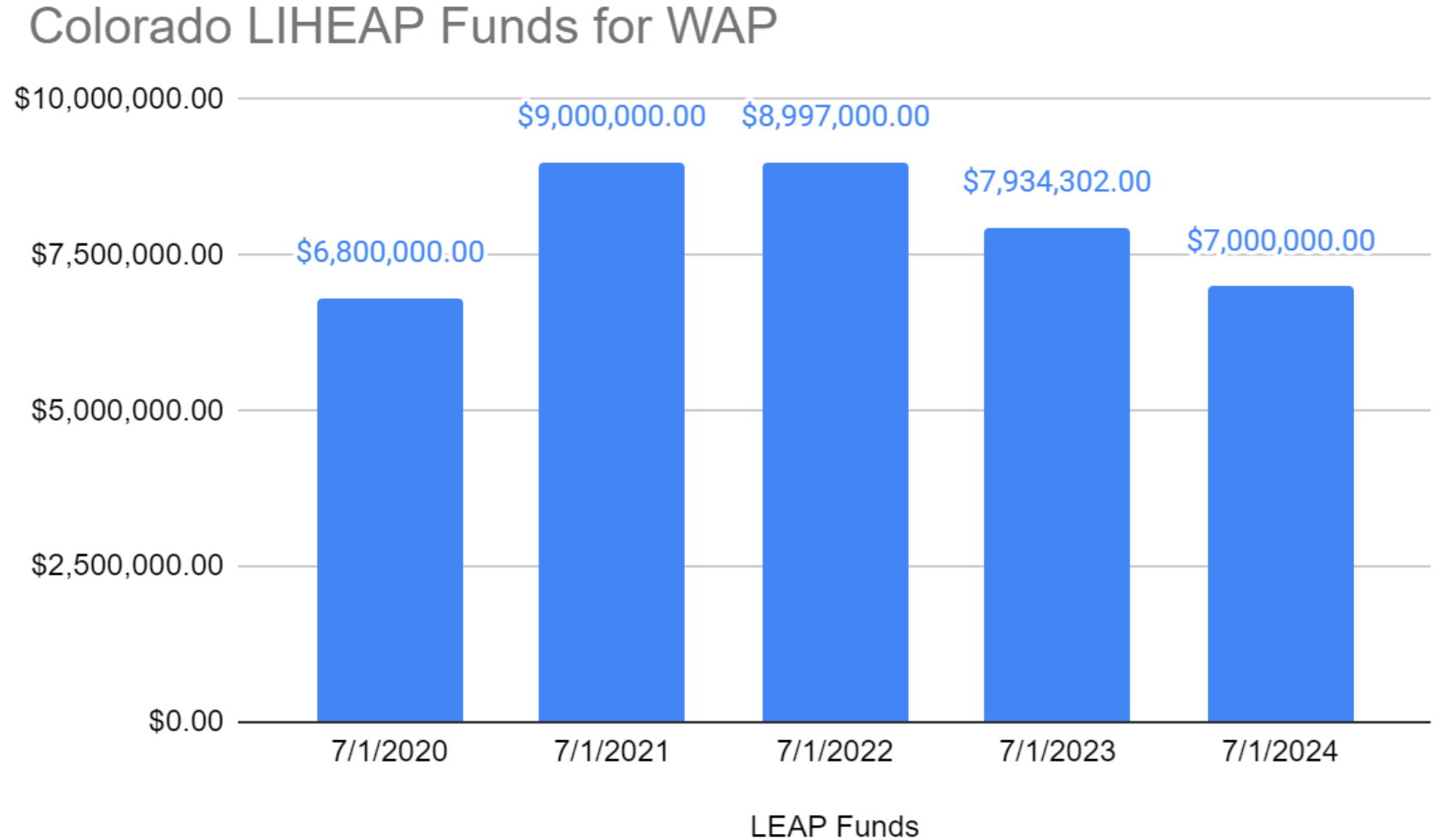
**Deeper
Retrofits**

**Support
for DOE
ACPU**

Flexibility!

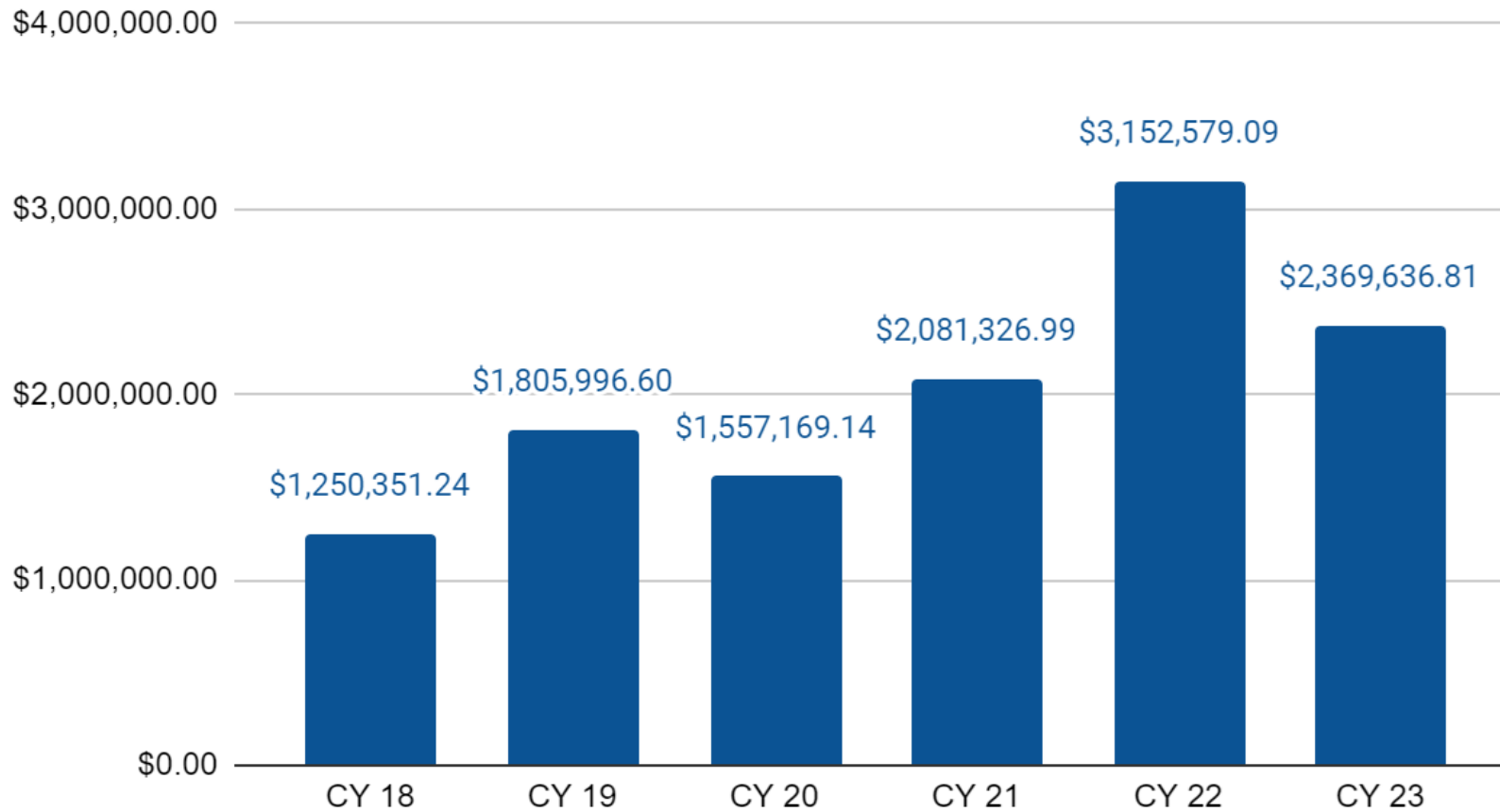
Colorado's LIHEAP Funds for WAP

- Colorado Department of Human Services transfers 15% to WAP
- Increased Health and Safety
- Readiness



Colorado's WAP Utility Rebates

Colorado WAP Utility Rebates (not including solar)



- 2018- Feb 2024: Nearly \$3.5M in solar rebates
- Since 2018 Average \$2.6M Annually
- Non-federal = 80% AMI and undocumented households

Colorado House Bill 21-1105

Created the Energy Assistance System Benefit Charge

- October 2021 all IOUs collected a monthly \$0.50 charge from customers. Increased to \$0.75 in October 2022
- Energy EBT Program - administered by CDHS' LEAP team
- Then 2% for outreach and education
- Then split 45% for energy assistance and 45% for WAP
- Remaining 10% from that split is voted on by the commission that oversees the funds

Colorado House Bill 21-1105 continued

Year 1
\$8.9M

Year 2
\$13.6M

Year 3
\$10.9M

- Increased Health and Safety
- Solar
- Electrification
- Workforce Development



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