

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

1. Type of Submission:

- ☐ Preapplication
- ☒ Application
- ☐ Changed/Corrected Application

2. Type of Application:

- ☒ New
- ☐ Continuation
- ☐ Revision

If Revision, select appropriate letter(s)

Other (specify):

3. Date Received

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

DE-SE0001812

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

a. Legal Name: STATE OF COLORADO Governor's Energy Office

b. Employer/Taxpayer Identification Number (EIN/TIN):
840644739c. UEI:
JLVGQ4E7RD53

d. Address:

Street 1: 1600 BROADWAY SUITE 1960

Street 2:

City: DENVER

County: Denver

State: CO

Province:

Country: U.S.A.

Zip / Postal Code: 802020000

e. Organizational Unit:

Department Name:
Colorado Energy OfficeDivision Name:
Weatherization Assistance Program

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: First Name: Stephanie

Middle Name:

Last Name: Insinna-Sahondo

Suffix:

Title: WAP Director

Organizational Affiliation:

Telephone Number: 7203844220

Fax Number:

Email: stephanie.insinna-sahondo@state.co.us

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

9. Type of Applicant:

A State Government

10. Name of Federal Agency:

U. S. Department of Energy

11. Catalog of Federal Domestic Assistance Number:

81.042

CFDA Title:

Weatherization Assistance Program

12. Funding Opportunity Number:

DE-WAP-0002025

Title:

2025 Weatherization Assistance Program (WAP) Funding

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

State of Colorado

15. Descriptive Title of Applicant's Project:

Colorado Energy Office Weatherization Assistance Program

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

16. Congressional District Of:

a. Applicant: Colorado Congressional District 01

b. Program/Project: CO-Statewide

Attach an additional list of Program/Project Congressional Districts if needed:

17. Proposed Project:

a. Start Date: 07/01/2025

b. End Date: 06/30/2026

18. Estimated Funding (\$):

a. Federal	7,678,799.00
b. Applicant	0.00
c. State	0.00
d. Local	0.00
e. Other	0.00
f. Program Income	0.00
g. TOTAL	7,678,799.00

19. Is Application subject to Review By State Under Executive Order 12372 Process?:

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372

20. Is the applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation)

No

21. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to

☒ I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency

Authorized Representative:

Prefix: First Name: Stephanie

Middle Name:

Last Name: Insinna-Sahondo

Suffix:

Title: WAP Director

Telephone Number: 7203844220

Fax Number:

Email: stephanie.insinna-sahondo@state.co.us

Signature of Authorized Representative: Signed Electronically

Date Signed: 07/11/2025

U.S. DEPARTMENT OF ENERGY



BUDGET JUSTIFICATION FOR FORMULA GRANTS

Applicant: STATE OF COLORADO Governor's Energy Office
Award number: SE0001812

Budget period: 07/01/2025 - 06/30/2026

1. **PERSONNEL** - Prime Applicant only (all other participant costs are listed in 6 below and form SF-242A, Section B. Line 6.f. Contracts and Sub-Grants).

Positions to be supported under the proposed award and brief description of the duties of professionals:

Position	Description of Duties of Professionals
Director of Weatherization	Directs staff, partners, vision, strategies, goals, and operations
Associate Director of Weatherization	Manages Program Delivery team, federal partner and subgrantee relationships, strategic planning, operations, budgeting
Senior Policy & Program Manager	Processes invoices for subgrantees, produces subgrantee quarterly reports, co-manages WAP data and supports data special projects, assists in subgrantee admin monitoring, recovers utility rebates, manages subgrantee reconciliations, assists in the procurement of vendors, manages relationships with subgrantee staff
Senior Data Analyst	Develops and implements process improvements, supports energy efficiency and renewable energy utility rebate recovery efforts and data sharing improvements, Assist with developing WAP GIS program using existing WAP data and other external data sets
Contract & Budget Specialist	Manages contracts for subgrantee agencies, utilities, and other vendors. Assist with subgrantee admin monitoring. Review and approve subgrantee monthly invoices as a part of the Operations approval process. Assist with WAP specific procurements. Assist the subgrantee network with any procurement related questions.
Program Manager	Processes invoices for subgrantees, co-manages WAP data and supports data special projects, user management of the WAP Network in Salesforce, produces subgrantee quarterly reports, assists in subgrantee admin monitoring, manages subgrantee reconciliations, assists in the procurement/management of vendors, co-lead on GIS projects, manages relationships with subgrantee staff, provides subgrantee Salesforce trainings
Program Associate	Creates Salesforce reports for the sub-grantees, distributes LEAP reports to service providers, conducts monthly desk audits of the WAP database, presents metric reports to WAP Service Providers, assists with administrative monitoring.
Senior Engagement Manager	Manages and directs all engagement activities on behalf of the state WAP. Manages Engagement team
Senior Communications Specialist	Manages all inbound and outbound communications via phone, website, social media, email.
Senior Quality Manager	Manages Quality Management (QM) team and oversees Quality Assurance Inspection, Quality Control inspection, and Training and Technical Assistance activities. Assist with Single Family and Multifamily inspections as needed. Also performs Quality Control inspections and in person field training as needed.
Training Manager	Performs and oversees Training and Technical Assistance activities for the CEO staff and Subgrantee staff. This includes scheduling and or coordinating conference attendance, centralized activities, specific agency training, Quarterly Technical Meeting, and certification training. The Training Manager assists with direct field training as needed and manages Purchase Orders and Contracts with Training Vendors.

Quality & Technical Manager	Performs Quality Assurance inspections as required, and performs Training and Technical Assistance as required from QA inspections, or as requested by Subgrantees. Also performs Quality Control (in progress inspections).
Quality Specialist	Assists and or performs Quality Assurance inspections as required, and assists or performs Training and Technical Assistance as required from QA inspections, or as requested by Subgrantees. Also performs Quality Control (in progress inspections).
Quality Specialist	Assists and or performs Quality Assurance inspections as required, and assists or performs Training and Technical Assistance as required from QA inspections, or as requested by Subgrantees. Also performs Quality Control (in progress inspections).
Bilingual Communications Associate	Helps develop Spanish language communications and marketing materials and helps engage with Spanish language speakers

Direct Personnel Compensation:

Position	Salary/Rate	Time	Direct Pay
Director of Weatherization	\$133,250.00	18.0000 % FT	\$23,985.00
Associate Director of Weatherization	\$111,336.00	18.0000 % FT	\$20,040.48
Senior Policy & Program Manager	\$91,225.00	18.0000 % FT	\$16,420.50
Senior Data Analyst	\$90,000.00	18.0000 % FT	\$16,200.00
Contract & Budget Specialist	\$78,925.00	18.0000 % FT	\$14,206.50
Program Manager	\$78,925.00	18.0000 % FT	\$14,206.50
Program Associate	\$71,650.00	18.0000 % FT	\$12,897.00
Senior Engagement Manager	\$102,090.00	13.0000 % FT	\$13,271.70
Senior Communications Specialist	\$90,000.00	18.0000 % FT	\$16,200.00
Senior Quality Manager	\$97,758.00	18.0000 % FT	\$17,596.44
Training Manager	\$87,627.00	18.0000 % FT	\$15,772.86
Quality & Technical Manager	\$87,344.00	18.0000 % FT	\$15,721.92
Quality Specialist	\$75,000.00	18.0000 % FT	\$13,500.00
Quality Specialist	\$71,600.00	18.0000 % FT	\$12,888.00
Bilingual Communications Associate	\$76,875.00	13.0000 % FT	\$9,993.75
Direct Pay Total			\$232,900.65

2. FRINGE BENEFITS

- a. Are the fringe cost rates approved by a Federal Agency? If so, identify the agency and date of latest rate agreement or audit below, and attach a copy of the rate agreement to the application.

- b. If a. above does not apply, please use this box (or an attachment) to further explain how your total fringe benefits costs were calculated. Your calculations should identify all rates used, along with the base they were applied to (and how the base was derived), and a total for each (along with grand total). If there is an established computation methodology approved for state-wide use, please provide a copy. Also, please fill out the table below with the Fringe Benefits Calculations.

Fringe benefits for the grantee agency are based on actual expenditures for the FY ending June 30, 2025. The same fringe benefit rate is used for all federal grants awarded to the Colorado Energy Office. Fringe benefits include: Dental Insurance, Health Insurance, Life Insurance, Retirement Plans, PERA (State of Colorado Employee Retirement Plan), and Disability insurance. Individual totals of fringe benefits and percentages of specific benefits will vary due to the variance of costs associated with available insurance plans which are available to employees, spouses and dependents. Actual fringe benefit calculations will not be available until employees at the CEO complete their open enrollment on May 18, 2025, which is after the State Plan Application is due. State of Colorado employee fringe benefits details are located in the following link:
<https://www.colorado.gov/pacific/dhr/benefits>

Fringe Benefits Calculations

Position	Direct Pay	Rate	Benefits
Director of Weatherization	\$23,985.00	27.1797 %	\$6,519.05
Associate Director of Weatherization	\$20,040.48	30.7697 %	\$6,166.40
Senior Policy & Program Manager	\$16,420.50	27.0296 %	\$4,438.40
Senior Data Analyst	\$16,200.00	27.1796 %	\$4,403.10
Contract & Budget Specialist	\$14,206.50	28.3396 %	\$4,026.07
Program Manager	\$14,206.50	28.3396 %	\$4,026.07
Program Associate	\$12,897.00	28.5195 %	\$3,678.16
Senior Engagement Manager	\$13,271.70	34.1796 %	\$4,536.21
Senior Communications Specialist	\$16,200.00	27.5597 %	\$4,464.67
Senior Quality Manager	\$17,596.44	25.7697 %	\$4,534.55
Training Manager	\$15,772.86	30.8296 %	\$4,862.71
Quality & Technical Manager	\$15,721.92	35.3496 %	\$5,557.64
Quality Specialist	\$13,500.00	20.1596 %	\$2,721.55
Quality Specialist	\$12,888.00	29.6495 %	\$3,821.23
Bilingual Communications Associate	\$9,993.75	28.3395 %	\$2,832.18
Fringe Benefits Total			\$66,587.99

3. TRAVEL

- a. Please provide the purpose of travel, such as professional conference(s), DOE sponsored meeting(s), project management meeting, etc. If there is any foreign travel, please identify.

Purpose of Trip	Number of Trips	Cost Per Trip	Total
Out of State Travel: Travel for administrative weeklong trip	10	\$500.00	\$5,000.00
In State Travel: travel days for quality assurance inspections, outreach support, training, and general oversight. Costs calculated based on a per-day average for per diems and hotels.	30	\$383.00	\$11,490.00
In State Travel: travel days for administrative and financial monitoring visits, on-site agency training, outreach support, and general oversight. Costs calculated based on a per-day average for per diems and hotels.	30	\$520.00	\$15,600.00
In State Travel: travel for in-state conferences and presentations.	2	\$1,200.00	\$2,400.00
Out of State Travel: Travel for technical and training weeklong trips including airfare, hotels, and per diem	10	\$1,500.00	\$15,000.00
Travel Total			\$49,490.00

- b. Please provide the basis for estimating the costs, such as past trips, current quotations, Federal Travel Regulations, etc. All listed travel must be necessary for the performance of the award objectives.

All travel is based on current GSA rates and based on historical totals of travel in the CEO office.

4. EQUIPMENT - Equipment is generally defined as an item with an acquisition cost greater than \$10,000 and a useful life expectancy of more than one year.

- a. List all proposed equipment below and briefly justify its need as it applies to the objectives of the award.

Equipment	Unit Cost	Number	Total Cost	Justification of Need
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- b. Please provide a basis of cost such as vendor quotes, catalog prices, prior invoices, etc. and justify need. If the Equipment is being proposed as Cost Share and was previously acquired, please provide the source and value of its contribution to the project and logical support for the estimated value shown. If it is new equipment which will retain a useful life upon completion of the project, provide logical support for the estimated value shown. Also, please indicate whether the Equipment is being used for other projects or is 100% dedicated to the DOE project.

5. SUPPLIES - Supplies are generally defined as an item with an acquisition cost of \$10,000 or less and a useful life expectancy of less than one year. Supplies are generally consumed during the project performance.

- a. List all proposed supplies below, the estimated cost, and briefly justify the need for the supplies as they apply to the objectives of the award. Note that all direct costs, including Supply items, may not be duplicative of supply costs included in the indirect pool that is the basis of the indirect rate applied for this project.

General Category	Cost	Justification of Need
Supplies: non-capitalized IT	\$38,787.00	Salesforce and other software licenses and non-capitalized IT supplies such as keyboards, monitor, etc.
Supplies: miscellaneous	\$34,556.00	Miscellaneous supplies and materials, based on prior year expenditures. Includes non-capitalized materials such as tools and materials for trainings.
Materials and Supplies Total	\$73,343.00	

- b. Please provide a basis of cost for each item listed above and justify need. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

These totals are based on the historicals of the team and office.

6. CONTRACTS AND SUBGRANTS - Provide the following information for New proposed subrecipients and subcontractors. For ongoing subcontractors and subrecipients, this information does not have to be restated here, if it is provided elsewhere in the application; under Name of Proposed Sub, indicate purpose of work and where additional information can be found (i.e. weatherization subgrants, Annual File section IV.1).

Name of Proposed Sub	Total Cost	Basis of Cost*
Energy Outreach Colorado Efficiency, LLC	\$275,000.00	Region State Wide Multifamily, selected on 10 CFR 440.15 criteria
Arapahoe County	\$948,285.00	Region 5, selected on 10 CFR 440.15 criteria
Energy Resource Center	\$3,968,545.00	Regions 2, 3, 4, 6, 8 selected on 10 CFR 440.15 criteria
Pueblo County	\$661,442.00	Region 9, selected on 10 CFR 440.15 criteria
Housing Resources of Western Colorado	\$763,439.00	Region 7, selected on 10 CFR 440.15 criteria
Northwest Colorado Council of Governments	\$414,860.00	Region 1, selected on 10 CFR 440.15 criteria
Contracts and Subgrants Total	\$7,031,571.00	

*For example, Competitive, Historical, Quote, Catalog

7. OTHER DIRECT COSTS - Other direct costs are direct cost items required for the project which do not fit clearly into other categories. These direct costs may not be duplicative of costs included in the indirect pool that is the basis of the indirect rate applied for this project. Examples are: conference fees, subscription costs, printing costs, etc.

a. Please provide a General Description, Cost and Justification of Need.

General Description	Cost	Justification of Need
Outreach	\$40,356.00	Engagement, outreach, education & branding
Official Functions (Admin and Field)	\$15,803.00	Meal and space costs outside of the CEO office in Denver associated with meetings and training sessions for subgrantee staff. Meals and refreshments are incidental to these functions. These meeting are often too large to hold in CEO offices or have additional technical requirements. Meetings are also held off-site to accommodate the geographic dispersion of sub-grantees. All meals provided are deducted from per diem allowances claimed.
Office and Storage Rental	\$3,600.00	Based on quote from storage company
Dues and Memberships	\$1,570.00	NASCSP & EOW
Registrations: Classes & Training	\$23,000.00	Classes and training for sub-grantee staff.
Registrations: Out-of-State Conferences, Seminars, and Meetings	\$10,000.00	Registration fees for Out-of-state conferences, seminars, and meetings.
Other Direct Costs Total	\$94,329.00	

b. Please provide a basis of cost for each item listed above. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

Based on historical costs of the office.

8. INDIRECT COSTS

a. Are the indirect cost rates approved by a Federal agency? If so, identify the agency and date of latest rate agreement or audit and provide a copy of the rate agreement.

Department of Health & Human Services March 30, 2024

*The rates approved in this agreement are for use on grants, contracts, and other agreements with the Federal Government. CEO's predetermined rates are from 7/1/23-6/30/2025

CEO's NICRA has been uploaded to the SF-424

CEO is claiming the full 43.6%

b. If the above does not apply, indicate the basis for computation of rates, including the types of benefits to be provided, the rate(s) used, and the cost base for each rate. You may provide the information below or provide the calculations separately.

The name and phone number of the individual responsible for negotiating the State's indirect cost rates.

Name:

Phone Number:

Indirect costs calculations:

Indirect Cost Account	Direct Total	Indirect Rate	Total Indirect
NICRA 43.6%	\$299,489.00	43.6000 %	\$130,577.20
		Indirect Costs Total	\$130,577.20

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. SE0001812		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF COLORADO Governor's Energy Office 1600 BROADWAY SUITE 1960 DENVER, CO 802020000		4. Program/Project Start Date 07/01/2025	5. Completion Date 06/30/2026

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		\$ 7,678,799.00		\$ 7,678,799.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 7,678,799.00	\$ 0.00	\$ 7,678,799.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 142,428.00	\$ 0.00	\$ 90,473.00	\$ 0.00	\$ 232,901.00
b. Fringe Benefits	\$ 44,394.00	\$ 0.00	\$ 22,194.00	\$ 0.00	\$ 66,588.00
c. Travel	\$ 23,000.00	\$ 0.00	\$ 26,490.00	\$ 0.00	\$ 49,490.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 44,157.00	\$ 0.00	\$ 29,186.00	\$ 0.00	\$ 73,343.00
f. Contract	\$ 0.00	\$ 698,465.00	\$ 0.00	\$ 884,384.00	\$ 7,031,571.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 43,106.00	\$ 0.00	\$ 51,223.00	\$ 0.00	\$ 94,329.00
i. Total Direct Charges	\$ 297,085.00	\$ 698,465.00	\$ 219,566.00	\$ 884,384.00	\$ 7,548,222.00
j. Indirect Costs	\$ 81,454.00	\$ 0.00	\$ 49,123.00	\$ 0.00	\$ 130,577.00
k. Totals	\$ 378,539.00	\$ 698,465.00	\$ 268,689.00	\$ 884,384.00	\$ 7,678,799.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. SE0001812		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF COLORADO Governor's Energy Office 1600 BROADWAY SUITE 1960 DENVER, CO 802020000		4. Program/Project Start Date 07/01/2025	5. Completion Date 06/30/2026

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 7,678,799.00	\$ 0.00	\$ 7,678,799.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 232,901.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 66,588.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 49,490.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 73,343.00
f. Contract	\$ 3,296,770.00	\$ 615,684.00	\$ 170,568.00	\$ 50,589.00	\$ 7,031,571.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 94,329.00
i. Total Direct Charges	\$ 3,296,770.00	\$ 615,684.00	\$ 170,568.00	\$ 50,589.00	\$ 7,548,222.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 130,577.00
k. Totals	\$ 3,296,770.00	\$ 615,684.00	\$ 170,568.00	\$ 50,589.00	\$ 7,678,799.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. SE0001812		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF COLORADO Governor's Energy Office 1600 BROADWAY SUITE 1960 DENVER, CO 802020000		4. Program/Project Start Date 07/01/2025	
		5. Completion Date 06/30/2026	

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 7,678,799.00	\$ 0.00	\$ 7,678,799.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) WEATHERIZATION ON READINESS	(2) Intake/Eligibility	(3) ENERGY AUDITS	(4) Final Inspection	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 232,901.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 66,588.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 49,490.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 73,343.00
f. Contract	\$ 659,466.00	\$ 213,191.00	\$ 232,670.00	\$ 209,784.00	\$ 7,031,571.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 94,329.00
i. Total Direct Charges	\$ 659,466.00	\$ 213,191.00	\$ 232,670.00	\$ 209,784.00	\$ 7,548,222.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 130,577.00
k. Totals	\$ 659,466.00	\$ 213,191.00	\$ 232,670.00	\$ 209,784.00	\$ 7,678,799.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: CO Grant Number: SE0001812 Program Year: 2025

Name: **Arapahoe County**

Contact: Justin Howe

UEI: NENNKAE18LK6

DUNS: 073410680

Address: 907 Salida Way
Aurora, CO 80011-0000

Phone: (303) 636-1985

Fax: (303) 636-1997

Email: Jhowe@arapahoegov.com

Counties ADAMS County
served: ARAPAHOE County

Tentative allocation: \$ 948,285.00

Planned units: 76

Type of organization: Unit of local government

Congressional
districts served:

CD

CO-06

CO-01

CO-04

CO-07

Source of labor: Agency and Contractors

Name: **Energy Outreach Colorado**

Contact: Luke Ilderton

UEI: FLPLJ14K4X52

DUNS: 802667766

Address: 225 East 16th Avenue, Suite 200
Denver, CO 80203-0000

Phone: (303) 266-5054

Fax: () -

Email: lilderton@energyoutreach.org

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: CO Grant Number: SE0001812 Program Year: 2025

Counties served:	CHAFFEE County CHEYENNE County ARAPAHOE County BENT County ARCHULETA County BACA County ADAMS County ALAMOSA County CONEJOS County BOULDER County Broomfield County CLEAR CREEK County Denver DELTA County DOLORES County COSTILLA County CROWLEY County CUSTER County ELBERT County DOUGLAS County EL PASO County EAGLE County FREMONT County GARFIELD County GILPIN County GRAND County GUNNISON County JACKSON County JEFFERSON County HINSDALE County HUERFANO County LAKE County KIOWA County KIT CARSON County LA PLATA County LARIMER County LAS ANIMAS County MOFFAT County MESA County LINCOLN County LOGAN County MONTEZUMA County MINERAL County OTERO County MONTROSE County MORGAN County RIO GRANDE County ROUTT County PHILLIPS County PITKIN County	Tentative allocation: \$ 275,000.00 Planned units: 18 Type of organization: Non-profit organization	Congressional districts served:	CD
				CO-Statewide

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: CO Grant Number: SE0001812 Program Year: 2025

PUEBLO County
RIO BLANCO County
PROWERS County
OURAY County
PARK County
SAGUACHE County
SAN MIGUEL County
SUMMIT County
SEDGWICK County
TELLER County
WASHINGTON County
WELD County
SAN JUAN County
YUMA County

Source of labor: Contractors

Name: **Energy Resource Center**

Address: 540 E. Cimarron Street
Colorado Springs, CO 80903-0000

Contact: Marcus Redden
UEI: LJ84J5CKEPK3
DUNS: 149049165
Phone: (719) 591-0772
Fax: () -
Email: Marcusr@erc-co.org

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: CO Grant Number: SE0001812 Program Year: 2025

Counties served:	BOULDER County	Tentative allocation: \$ 3,968,545.00	Congressional districts served:	CD
	CHEYENNE County			CO-Statewide
	ALAMOSA County	Planned units: 199		
	Denver	Type of organization: Non-profit organization		
	Broomfield County			
	CONEJOS County			
	COSTILLA County			
	LARIMER County			
	KIT CARSON County			
	JEFFERSON County			
	GILPIN County			
	EL PASO County			
	FREMONT County			
	DOUGLAS County			
	ELBERT County			
	YUMA County			
	WELD County			
	WASHINGTON County			
	SEDGWICK County			
	TELLER County			
	SAGUACHE County			
	PHILLIPS County			
	RIO GRANDE County			
	MORGAN County			
	LOGAN County			
	LINCOLN County			
	MINERAL County			
		Source of labor: Agency and Contractors		

Name: Housing Resources of Western Colorado		Contact: Marcy Child			
		UEI: JWJCTJNGDU56			
		DUNS: 149429300			
Address:	524 30 Road, Suite 3	Phone: (970) 459-1146			
	Grand Junction, CO 81504-0000	Fax: () -			
		Email: marcyc@hrwco.org			
Counties served:	ARCHULETA County	Tentative allocation: \$ 763,439.00	Congressional	CD	
	DELTA County		districts served:	CO-03	
	DOLORES County	Planned units: 46			
	GUNNISON County				Type of organization: Non-profit organization
	HINSDALE County				
	LA PLATA County				
	MESA County				
	MONTROSE County				
	MONTEZUMA County				
	OURAY County				
	SAN JUAN County				
	SAN MIGUEL County				
Source of labor: Agency and Contractors					

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: CO Grant Number: SE0001812 Program Year: 2025

Name: **Northwest Colorado Council of Governments**

Contact: Doug Jones

UEI: RQC9GY7Z15J7

DUNS: 047622774

Address: 249 Warren Ave.

Phone: (970) 468-0295102

Silverthorne, CO 80498-0000

Fax: () -

Email: Djones@nwccog.org

Counties served: SUMMIT County

Tentative allocation: \$ 414,860.00

Congressional

CD

ROUTT County

Planned units: 26

districts served:

CO-03

PARK County

Type of organization:

CO-05

PITKIN County

CO-02

RIO BLANCO County

MOFFAT County

LAKE County

JACKSON County

GRAND County

GARFIELD County

EAGLE County

CLEAR CREEK County

CHAFFEE County

Source of labor: Agency and Contractors

Name: **Pueblo County**

Contact: Jenny Hohman

UEI: ETB4RDR743J9

DUNS: 080373236

Address: 2631 East 4th St

Phone: (719) 583-6313

Pueblo, CO 81001-0000

Fax: () -

Email: jennifer.hohman@pueblounty.us

Counties served: OTERO County

Tentative allocation: \$ 661,442.00

Congressional

CD

PROWERS County

Planned units: 33

districts served:

CO-04

PUEBLO County

Type of organization: Unit of local government

CO-03

KIOWA County

HUERFANO County

LAS ANIMAS County

CUSTER County

CROWLEY County

BACA County

BENT County

Source of labor: Agency and Contractors

U.S. Department of Energy

Weatherization Assistance Program (WAP)

WEATHERIZATION ANNUAL FILE WORKSHEET

Grant Number: SE0001812, State: CO, Program Year: 2025

Recipient: STATE OF COLORADO Governor's Energy Office

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Arapahoe County (Aurora)	\$948,285.00 76
Energy Outreach Colorado (Denver)	\$275,000.00 18
Energy Resource Center (Colorado Springs)	\$3,968,545.00 199
Housing Resources of Western Colorado (Grand Junction)	\$763,439.00 46
Northwest Colorado Council of Governments (Silverthorne)	\$414,860.00 26
Pueblo County (Pueblo)	\$661,442.00 33
Total:	\$7,031,571.00 398

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	353
Rewatherized Units	45
Average Unit Costs, Units subject to DOE Project Rules	
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B Total Units Weatherized	353
C Total Units Reweatherized	45
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	398
E Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F Total Funds for Program Operations	\$3,296,770.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	398
H Average Program Operations Costs per Unit (F divided by G)	\$8,283.34
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J Total Average Cost per Dwelling (H plus I)	\$8,283.34

IV.3 Energy Savings

Method used to calculate savings: <input type="checkbox"/> WAP algorithm <input checked="" type="checkbox"/> Other (describe below)				
	Units	Savings Calculator (MBtus)	Energy Savings	
This Year Estimate	398	N/A	15124	*
Prior Year Estimate	477	N/A	18032	*
Prior Year Actual	367	N/A	0	*
* Energy Savings values were manually entered.				

U.S. Department of Energy
Weatherization Assistance Program (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET
Grant Number: SE0001812, **State:** CO, **Program Year:** 2025
Recipient: STATE OF COLORADO Governor's Energy Office

Method used to calculate savings description:

The Colorado Weatherization Assistance Program calculated its energy savings based on a combination of measured results and assumed savings.

Home heating savings were determined via a study using pre and post weatherization utility data from client homes; average home energy savings from heating were found to be 32.70 MMBtu per year. This savings is further subdivided into home heating type to determine the amount of fuel and money saved for heating with natural gas, electricity, propane, and other fuel sources. Additionally, non-heating electric savings were estimated based on LED, refrigerator, and air conditioning energy savings. Total non-heating electric energy savings were determined to be 5.30 MMBtu per year.

The combination of multi-fuel heating energy savings and non-heating electricity savings were combined to determine an average annual energy savings of 38.00 MMBtu per home per year. This yields an average cost savings of \$533.70 per year. For the 398 homes that will be weatherized using DOE funds, the total annual energy savings are 15,124 MMBtu yielding a cost savings of \$212,413 per year.

IV.4 DOE-Funded Leveraging Activities

CEO WAP has chosen to use other (non-DOE) funds for leveraging activities for Program Year 2025.

IV.5 Policy Advisory Council Members

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

Arapahoe County	Type of organization: Unit of Local Government Contact Name: Regina Bosma Phone: 3036361982 Email: rbosma@arapahoe.gov
Aurora Water	Type of organization: Utility Contact Name: Elizabeth Gillitzer-Gallardo Phone: 3037397456 Email: egallard@auroragov.org
Colorado Department of Human Services	Type of organization: Unit of State Government Contact Name: Theresa "TK" Kullen Phone: 7207888050 Email: theresa.kullen@state.co.us
Colorado Energy Office	Type of organization: Unit of State Government Contact Name: Brandon Watkins Phone: 7202813266 Email: brandon.watkins@state.co.us
COLORADO SPRINGS UTILITIES	Type of organization: Utility Contact Name: Doug Bursnall Phone: 7196688503 Email: dbursnall@csu.org
Energy Outreach Colorado	Type of organization: Non-profit (not a financial institution) Contact Name: Luke Ilderton Phone: 3032665054 Email: lilderton@energyoutreach.org
Xcel Energy	Type of organization: Utility Contact Name: Andrew Hawkins Phone: 3032942696 Email: andrew.r.hawkins@xcelenergy.com

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

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/17/2025	Denver Post on 4/7/2025.

IV.7 Miscellaneous

U.S. Department of Energy
Weatherization Assistance Program (WAP)
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Per DOE WPN 24-7 guidance and to allow the most flexibility to calculate ACPU, the following budget categories will be taken out of Operational Costs for PY25:

- Intake/Eligibility
- Energy Audit
- Final Inspection

CEO WAP will establish separate budgets that support the weatherization process, and these expenditures will no longer be included in the calculation of the ACPU. Subgrantees will budget for and charge to these categories: salary, fringe, and travel (mileage, lodging, and per diem) associated with the staff performing these duties. All other direct costs necessary to implement weatherization will continue to be budgeted and expensed as Operations.

In accordance with 2 CFR 200.425(a)(2), Only those Subgrantees expending \$1M or more in Total Federal Funding (Federal Awards) will receive "Financial Audit" funds identified in CEO's SF-424a Budget. At this time all six of our subgrantees receive a Single Audit each year.

Business Officer: Stephanie Insinna-Sahondo, stephanie.insicinna-sahondo@state.co.us

Principal Investigator: Brandon Watkins, brandon.watkins@state.co.us

Fuel Switching

Any fuel switching to be completed with DOE Funds will be done with the written approval by the DOE on a case-by-case basis.

IT: CEO WAP utilizes Google Drive and a Salesforce database to meet the needs of the CEO WAP network for sharing information, data collection, reporting, and evaluation measurement and verification. Salesforce is used for quality assurance inspection and utility rebate contributions processes, as well as tracking of production targets by month and county, and general reporting needs.

Grantee Staff July 1, 2025:

Management: 3 (Stephanie Insinna-Sahondo, Andy Cordova, & Brandon Watkins)

Quality Assurance: 2 (Jacob Wolff 0.25, Zac Stewart 0.75, Zeb Clayton 0.5, Edwin Ayala 0.5)

Administrative: 6 (Barbara Pazos-Brown, LeAnna Warren, Libby Lenox, Erin Edwards, Mitch Foresman, Program Manager)

T&TA: 2 (Jacob Wolff 0.75, Zac Stewart 0.25, Zeb Clayton 0.5, Edwin Ayala 0.5)

Total: 13

Grantee Workforce Forecast for Grant Period:

Management: 3 (Stephanie Insinna-Sahondo, Andy Cordova, & Brandon Watkins)

Quality Assurance: 2 (Jacob Wolff 0.25, Zac Stewart 0.75, Zeb Clayton 0.5, Edwin Ayala 0.5)

Administrative: 7 (Barbara Pazos-Brown, LeAnna Warren, Libby Lenox, Erin Edwards, Mitch Foresman, Program Manager, Contract & Budget Specialist)

T&TA: 2 (Jacob Wolff 0.75, Zac Stewart 0.25, Zeb Clayton 0.5, Edwin Ayala 0.5)

Total: 14

Subgrantee Staff Forecast for Grant Period:

Management: 50

Office Support Staff: 31

Field Supervisors: 22

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Auditors/Inspectors: 32

Field Technicians: 117

Total: 252

In addition to the workforce needs captured above that represent direct hires of CEO WAP, subgrantees will continue to utilize subcontractors when a need is identified. The above figures include employees that are at least partially funded by the DOE grant. Estimated workforce growth has been indicated

CEO WAP may take advantage of the redistribution provision which states CEO WAP can actively manage the grant and move funds as necessary to fully expend the monies during the budget period.

Definition of significant energy savings: A centrally heated multifamily building energy savings is based on its audit SIR results prior to contributions. These energy savings are deemed significant if the SIR is greater than or equal to one standard deviation above the median. This sample is based on projects approved over the past three complete program years.

For example, consider the sample which includes SIR values of: 1.00, 1.00, 1.20, 1.30, 1.50, 1.50, 1.70, 1.80, 2.00, and 2.00. The median value of this sample is 1.50 and one standard deviation is 0.37; thus the minimum value for significant energy savings for this sample is an SIR value greater than or equal to 1.87.

Policy Advisory Council

Name: The Colorado Commission on Low-Income Energy and Water Assistance

Type: Legislative Commission, Unit of State Government

Contact Name: Chairperson, Luke Ilderton

Phone: 303.226.5059

Email: lilderton@energyoutreach.org

Board Member	Contact	Organization	Contact Number	Type	At-Risk Categories Represented
Luke Ilderton (Chair)	lilderton@energyoutreach.org	Energy Outreach Colorado	303.226.5059	Non-profit organization	Low-income, elderly, persons with disabilities, utilities
Andrew Hawkins (Vice-Chair)	andrew.r.hawkins@xcelenergy.com	Xcel Energy	651.253.3369	Electric and natural gas utility	Low-income, utilities
Theresa Kullen	theresa.kullen@state.co.us	Colorado Low Income Home Energy Assistance Program	720.788.8050	Department of Human Services	Low-income, elderly, persons with disabilities, utilities
Elizabeth Gillitzer-Gallardo	egallard@auroragov.org	Aurora Water	303.739.7456	Water utility	Low-income, utilities
Doug Bursnall	dbursnall@csu.org	Colorado Springs Utilities	719.668.8503	Electric utility	Low-income, utilities
Regina Bosma	rbosma@arapahoe.gov	Arapahoe County Weatherization Division (subgrantee)	303.636.1982	Local government entity that serves low-income communities	Low-income, elderly, persons with disabilities, utilities
Brandon Watkins	brandon.watkins@state.co.us	CEO WAP (grantee)	720.281.3266	State Government office that administers WAP in Colorado	Low-income, elderly, persons with disabilities, utilities, Native Americans

To the extent possible, CEO's PAC members advocate for and provide a broad representation of under-served, at-risk, and low-income populations such as but not limited to: homes with high energy burdens, children, elderly persons, persons with disabilities, and Indigenous Americans. CEO WAP certifies that its Policy Advisory Council, the Commission on Low-Income Energy and Water Assistance, is an independent review entity for CEO WAP. In accordance with 10 CFR 440.17, the requirements for review were complied with in that any person(s) employed in any Grantee Weatherization Program can be a member of an existing commission or council, but must abstain in reviewing and approving the activities associated with the DOE WAP. As outlined by these requirements, Regina

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Weatherization Assistance Program (WAP)
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Bosma, a subgrantee staff member, participated in the DOE State Plan review process, and Brandon Watkins, a grantee staff member, recused himself from participation.

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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

Per Weatherization Program Notice (WPN) 25-1, which the Colorado Energy Office Weatherization Assistance Program (CEO WAP) will comply with for Program Year (PY) 2025 when determining client eligibility, income is defined as the gross income (all cash receipts) at or below 60% of the State Median Income (SMI) to align eligibility with Colorado Department of Human Services LIHEAP eligibility. A limit of 60% SMI will be used to determine eligibility for households up to seven residents. Households with eight or more residents will be qualified using 200% Federal Poverty Level (FPL). CEO WAP reserves the right to update these income limits throughout the year, mirroring changes to the Federal Poverty Level, and/or State Median Income, to use the most advantageous limits as possible for clients.

Gross income is calculated before taxes, insurance, etc., are deducted from the total cash receipts. Gross income does not include child support or cash receipts for individuals 17 years and younger. When Social Security is included in income, the gross income must be calculated before Medicare deductions. In the event that a legal dissolution of a family unit occurs, an individual may use their sole income since the dissolution, annualized, to determine eligibility in accordance with the proposed income limits. Application eligibility expires 12 months from subgrantee approval date if work on the dwelling unit (energy audit) has not been initiated. Agencies enter the expiration date of the application in the client file and then must recertify income eligibility on or after that date. The subgrantee must then verify the client is still eligible and the client may use any method to qualify (even if different from original qualification).

See "Colorado FPL to SMI Comparison" for a comparison from a 1 to 10 person household.

Describe what household eligibility basis will be used in the Program

To be eligible for CEO WAP services, clients must meet the income criteria outlined in 10 CFR 440.22, or meet a minimum of one of the following three criteria as outlined in WPN 25-1:

1. Have a gross household income (total annual cash receipts) at or below 60% SMI up to a seven person household, or no greater than 200% of the FPL for households with eight or more residents
2. Receive cash assistance payments under Title IV or Title XVI of the Social Security Act, or in accordance with applicable State or local law, at any time during the past five years preceding the determination of eligibility. Acceptable programs include:
 - o Temporary Assistance for Needy Families (TANF)
 - o Aid to the Needy and Disabled (AND)
 - o Supplemental Security Income (SSI)
 - o Supplemental Nutrition Assistance Program (SNAP)
3. Be currently enrolled for assistance under the Low Income Energy Assistance Act of 1981 (LIHEAP), provided that such a basis is at least 60% of the SMI, as determined with the criteria established by the Director of the Office of Management and Budget.
4. The U.S. Department of Housing and Urban Development (HUD) has qualified the dwelling unit. Per WPN 22-5, in order to ensure that a multifamily building meets the income eligibility requirements, set by DOE pursuant to the certification process established by HUD, property owners and managers shall submit the two following documents to HUD:
 - o Property Self-Certification form that specifies that the building in question meets DOE's income eligibility requirements
 - o Property Occupancy Report from current property records that confirm compliance with DOE's income eligibility requirements
5. The dwelling units have been previously approved for any of HUD's means-tested programs (per WPN 22-5). These include:
 - o Community Development Block Grants (CDBG)

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- HOME Investment Partnerships Program (HOME)
- Lead Hazard Control & Healthy Homes Program (OLHCHH)
- HUD Multi-family Assisted Properties
- HUD Public Housing
- HUD Vouchers
- HUD-VASH Vouchers (VA Supportive Housing)
- Low-Income Housing Tax Credit

HUD's means-tested programs accept households using percentages of Area Median Income (AMI) ranging from 30% AMI to 80% AMI, depending on specific program parameters. HUD uses 4,684 Fair Market Rent areas to establish AMIs, based on metropolitan areas and non-metropolitan counties. Proof of documentation certifying dwelling unit's eligibility must be in the client file.

6. The dwelling units have been previously approved for U.S. Department of Agriculture (USDA)'s means-tested programs (per WPN 25-4). These include but are not limited to:
- Section 521 Rental Assistance
 - Section 502 Direct Home Purchase Program
 - Section 533 Housing Preservation Grant Program
 - Section 504 Home Repair Program

These certification procedures do not apply to LIHTC properties, or for properties with USDA guaranteed loans. WAP subgrantees will follow standard procedures for verifying individual resident incomes for USDA guaranteed loans and LIHTC properties.

Method of verification of eligibility must be included in the client file.

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

The process for ensuring only eligible populations receive DOE weatherization benefits is:

1. Applicants who are either a U.S. citizen, a legal permanent resident, or who are otherwise lawfully present in the United States may receive services using CEO WAP federal funding.
2. For DOE funded jobs, a Lawful Presence Affidavit must be completed and signed by the applicant and included in the client file.
 - If another federal assistance program, such as SNAP, TANF, SSI, LIHEAP, AND, is used to automatically qualify the applicant for WAP, the Lawful Presence Affidavit does not need to be completed so long as the recipient of that program is also the WAP applicant.
 - If the WAP applicant is different from the recipient of the other federal assistance program, the Lawful Presence Affidavit must be completed by the WAP applicant.
3. If the applicant checks the "I am lawfully present in the United States pursuant to Federal Law" box, their residency status and photo identification is verified through the collection of one or more of the acceptable forms of identification below:
 - Colorado license (expired less than 10 years, image on file)
 - Colorado ID card (expired less than 10 years, image on file)
 - US passport (expired less than 10 years, image on file)
 - Out of state ID (expired less than one year); this includes any type of out of state ID and may include a temporary lawful status, such as limited presence/limited purpose (LP) ID

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- Foreign passport w/photo, US Visa, I-94
- Valid Military ID/Common Access Card
- A valid United States Coast Guard Merchant Mariner card
- A Indigenous American tribal document
- Certificate of Naturalization with photo less than 20 years old
- Valid I-551
- Valid EAD/ Temporary Resident
- Refugee/Asylee I-94 w/photo less than 20 years old
- Social Security Card verified by SSOLV
- U.S. birth certificate
- Certificate of Citizenship from the Department of Interior
- U.S. adoption order with birth information
- BIA ID Card with photo less than 10 years expired
- VA card with photo less than 20 years old
- Parent/Guardian affidavit if under 21 years old
- Colorado Department of Corrections or Federal Bureau of Prisons ID card
- If an applicant cannot provide one of the aforementioned documents, they must provide one of the forms of identification set forth in §24-76.5-103 (4)(a) C.R.S. or in 1 CCR 204-30 Rule 5 from the Executive Director of the Colorado Department of Revenue.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

All clients receiving services under WAP must first have their eligibility verified as outlined in V.1.1 of the State Plan by the local administrative subgrantee, and client eligibility must be documented in the client file. Single family, manufactured housing, and multifamily buildings are eligible building types for weatherization in the state of Colorado.

A subgrantee may weatherize a building if:

1. The subgrantee has obtained the written permission of the owner or their agent, and no fewer than 66% (50% for duplexes and four-unit buildings, and certain eligible types of large multifamily buildings) of the dwelling units in the building:
 - Are eligible dwelling units, or
 - Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building.
2. The dwelling units have been previously approved for any of HUD's means-tested programs (per WPN 22-5). These include:
 - Community Development Block Grants (CDBG)
 - HOME Investment Partnerships Program (HOME)

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- Lead Hazard Control & Healthy Homes Program (OLHCHH)
- HUD Multi-family Assisted Properties
- HUD Public Housing
- HUD Vouchers
- HUD-VASH Vouchers (VA Supportive Housing)
- Low-Income Housing Tax Credit

3. The dwelling units have been previously approved for USDA's means-tested programs (per WPN 25-4). These include but are not limited to:

- Section 521 Rental Assistance
- Section 502 Direct Home Purchase Program
- Section 533 Housing Preservation Grant Program
- Section 504 Home Repair Program

Method of verification of eligibility must be included in the client file, and must contain owner documentation and income documentation for renters.

Describe Reweathering compliance

Per 10 CFR 440.18, dwelling units are eligible for re-weatherization if it has been damaged by fire, flood, or force majeure and the repair of the weatherization materials is not covered by insurance.

Per Public Law 116-260, dwelling units are eligible for re-weatherization after a period of 15 years from when the previous weatherization job was completed. If a dwelling unit has been previously weatherized, under this program or under other Federal programs, they may receive further financial assistance for weatherization provided that:

1. The previous weatherization occurred more than 15 years before the date of application approval
2. The occupant reapplies for assistance under the program and is certified to be eligible,
3. The local subgrantee prioritizes the application with all others adhering to program priorities,
4. A new energy audit is performed which considers all previous energy conservation improvements to the dwelling.

The 15 year rolling date is tracked within the CEO WAP database using a previously weatherized report and "closed date" field.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include site-built homes, manufactured homes, duplexes, triplexes, quad-plexes, and multifamily units (five or more units) which meet the requirements of 10 CFR 440.22.

Per 10 CFR 440.22(f), CEO WAP also allows for the weatherization of shelters. For the purpose of determining how many dwelling units exist in a shelter, each 800 square feet of the shelter, or each floor of the shelter, may be classified as a dwelling unit. CEO WAP exercises caution in dealing with non-traditional dwelling units such as shelters, apartments over businesses, etc., to ensure they meet program regulations on whether the unit is, in fact, eligible. Weatherizing these types of units is discussed with and approved by, the DOE Project Officer prior to weatherization. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicants is not allowed. The use of a post office box for non-stationary campers or trailers does not meet this requirement.

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The intentional partial weatherization of units is not permitted.

NEPA Determination and Historic Preservation

Per WAP Memorandum 066, the requirements for the weatherization of federally or locally registered historic properties within the State of Colorado are located within the Prototype Programmatic Agreement between the DOE, CEO, and Colorado State Historic Preservation Office (SHPO) originally dated July 2011, amended July 2012, and then again in August 2020. The undertakings covered under this Programmatic Agreement (PA) are primarily smaller scale activities and routine projects, without the potential for adversely affecting historic properties, rather than complex undertakings with a greater potential to adversely affect historic properties, which would require completion of the typical Section 106 review process. All undertakings will be done in accordance with applicable local building codes or the International Building Code, where applicable.

CEO WAP reviews their NEPA determination and Historic Preservation PA, as applicable, to ensure they are compliant with all restrictions.

See CEO WAP 404 Historic & Environmental Preservation.

Describe how Rental Units/Multifamily Buildings will be addressed

Per 10 CFR 440.22, WPN 22-12, and WPN 22-13, a subgrantee may weatherize a multifamily building containing rental dwelling units, provided that:

1. No fewer than 66% (50% for duplexes and four-unit buildings, and certain eligible types of large multifamily buildings) of the dwelling units in the building:
 - Are eligible dwelling units, or
 - Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building.
2. The subgrantee has obtained the written permission of the owner, landlord, or a duly authorized agent to perform the installation of all weatherization materials and provide energy saving services prior to work commencing.
3. The subgrantee has ensured that benefits of weatherization assistance associated with rental units, including units where the tenants pay for their energy through their rent, will accrue primarily to the WAP qualified tenants residing in such units.
4. The landlord, owner, or authorized agent has signed a document agreeing that, for a reasonable period after weatherization work has been completed, tenants will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed.
 - The enforcement is provided through procedures established by the State by which tenants may file complaints, and owners, in response to such complaints, shall demonstrate that the rent increase concerned is related to matters other than the weatherization work performed.
 - Subgrantees are expected to receive tenant complaints regarding rent increases and should refer them to organizations (legal aide, tenant landlord mediation organizations, etc.) which can offer assistance in resolving the complaint
5. No undue or excessive enhancement shall occur to the value of the dwelling units.

Per 10 CFR 440.22(d), as a condition of serving multifamily buildings, CEO WAP will require financial participation, when feasible, from the owners of such buildings. Such financial participation shall not be reported as program income, nor will it be treated as if it were appropriated funds. The funds contributed by the landlord shall be expended in accordance with the agreement between the landlord and the weatherization subgrantee. Landlord financial participation for heating system and refrigerator replacements is mandatory in multifamily buildings, unless the landlord can prove financial plight per CEO WAP policy.

In order to secure the federal investment made under this part and address the issues of eviction from and sale of property receiving weatherization materials under this part, CEO WAP may seek landlord agreements to placement of a lien or to other contractual restrictions. For buildings identified in the State Plan, CEO WAP has established requirements and procedures to ensure such compliance in accordance with this section.

Partial weatherization of any unit is not allowed.

Describe the deferral Process

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A deferral is defined as the decision of a subgrantee to not provide weatherization services to a unit due to health, safety, or administrative reasons, until the situation is rectified. A list of conditions that may result in the deferral of a unit, as well as deferral requirements and the appeal process, are outlined in CEO WAP Policy 403.

A deferral status may be removed if the conditions which warranted the deferral are addressed or a client appeal is granted by CEO WAP; once the subgrantee verifies that the conditions have been remedied; or when weatherization Readiness Funds (WRF) are used.

CEO WAP uses an allocation formula to allocate funds out to all subgrantees. This allocation formula includes WRF from DOE.

CEO WAP has not had the need to set up a priority list for WRF. Every deferred unit is required to be assessed for WRF. If the unit is deemed to be an appropriate and allowable use of WRF and will result in a mitigation of the deferral, the subgrantee is given permission to proceed with spending WRF dollars.

It is required that subgrantee offices email CEO the first five times they plan to use WRF to discuss the process, allowable measures, and reporting, and to get approval before commencing WRF work. Any situation thereafter must follow the guidance provided in CEO WAP Policy 403.

For Programmatic Monitoring, CEO WAP reviews every DOE WRF client file each subgrantee has resolved and closed by the time of monitoring, as a way of ensuring WRF is appropriately used and reported.

For Quality Assurance, CEO WAP monitors a minimum of 5% of WRF units for each subgrantee to ensure compliance.

CEO WAP has elected to not define what a "reasonable time" is due to the potential unintended consequences of having a strict timeline on spending WRF. However, as stated in CEO WAP Policy 403, WRF must be spent within the same grant cycle.

See CEO WAP 403 Deferrals.

V.1.3 Definition of Children

Definition of children (below age): 6

V.1.4 Approach to Tribal Organizations

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

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

In accordance with 10 CFR 400.16(f), CEO WAP requires all subgrantees to provide the same weatherization services to eligible Indigenous American households that eligible non-Indigenous American households receive. Indigenous Americans residing on either the Ute Mountain Ute or Southern Ute reservations are eligible for weatherization services via standard allocation provided to Housing Resources of Western Colorado (HRWC) in which both reservations are located. Assistance to low-income, Indigenous American populations and other WAP qualified persons is equal in all respects.

V.2 Selection of Areas to Be Served

Colorado is committed to providing services to eligible households throughout all 64 counties within the state. Currently, the state is divided into nine single family regions which are managed by five weatherization subgrantees. In addition, there is one statewide subgrantee that provides service to centrally heated multifamily units in all 64 counties.

For PY25, the regions are:

Region 1, Northwest Colorado Council of Governments (NWCCOG): High Country - The counties included within this region are: Chaffee, Clear Creek, Eagle, Garfield, Grand, Jackson, Lake, Moffat, Park, Pitkin, Rio Blanco, Routt, and Summit.

Region 2, Energy Resource Center (ERC) Berthoud: Front Range - Boulder, Larimer, and Weld

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Region 3, ERC Sterling: Northeast Plains - Logan, Morgan, Phillips, Sedgwick, Washington and Yuma

Region 4, ERC Denver: Front Range - Broomfield, Denver, Gilpin, and Jefferson

Region 5, Arapahoe County: East Denver Metro Area - The counties included within this region are: Adams and Arapahoe.

Region 6, ERC Colorado Springs: Front Range - Cheyenne, Douglas, El Paso, Elbert, Fremont, Kit Carson, Lincoln, and Teller

Region 7, Housing Resources of Western Colorado (HRWC): Southwest - The counties included within this region are: Archuleta, Delta, Dolores, Gunnison, Hinsdale, La Plata, Mesa, Montezuma, Montrose, Ouray, San Juan, and San Miguel

Region 8, ERC Alamosa: San Luis Valley - Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache

Region 9, Pueblo County: Southeast Plains Energy Outreach Colorado Efficiency, LLC. (EOCE)v - The counties included within this region are: Baca, Bent, Crowley, Custer, Huerfano, Kiowa, Las Animas, Otero, Prowers, and Pueblo.

Statewide Multifamily, Energy Outreach Colorado Efficiency, LLC. (EOCE): Provides multifamily weatherization services in all 64 counties in order to best maximize resources.

FUNDING ALLOCATIONS

The CEO WAP funding allocation ensures funding will be fully utilized according to the approved DOE State Plan, that prior contractual funding obligations are able to be met, and that the distribution of remaining available funds are allocated on an equitable basis as much as possible (and in accordance with the requirements of the funding source) across all six program subgrantees.

V.3 Priorities

As defined in 10 CFR 440.16, priority is given to identifying and providing weatherization assistance to clients that fall into one or more of the priority categories below:

- Elderly persons (aged 60 years and over)
- Persons with disabilities
- Families with children (children below age 6)

In addition, subgrantees are required to track and report the number of Indigenous American populations served.

Subgrantees will be monitored on their provision of service to high priority groups, as approved in the subgrantee's plan to ensure compliance. Once a subgrantee satisfies all prioritization requirements, they may develop region-specific service models that promote cost-effective delivery of services due to constraining factors such as weather, geography, or the need to fulfill other contractual obligations, such as serving specific utility customers so long as the prioritization of specific clients as previously identified is achieved. CEO WAP provides oversight of the subgrantee client selection criteria at monitoring visits to ensure that local procedures are in accordance with DOE and CEO WAP policies. CEO WAP reports the number of priority clients served by priority type, as well as the number of Indigenous Americans served on a quarterly basis to the DOE.

V.4 Climatic Conditions

Climatic conditions within the State of Colorado vary significantly depending on the region of the State. Colorado is somewhat unique in that the climatic conditions range include the semiarid plains of eastern Colorado, to a high alpine mountain climate in the middle and western portions of the state. According to the 2009 International Energy Conservation Code, Colorado had four distinct climate zones, including Mixed Dry (4B), Cold (5B and 6B), and Very Cold (7B). WAP qualified residences in Colorado encounter a significant heating load in the winter months due to decreased temperatures across the state, especially within the mountain regions. Heating Degree Day (HDD) averages for the 64 counties vary from a low of 4,846 (Baca County) to a high of 10,139 (Summit County).

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The more populated areas along the Front Range (Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, El Paso, Jefferson, Larimer, and Weld counties) have HDD ranges from the low 6,000's to around 7,500. Cooling Degree Day (CDD) averages for the 64 counties vary from a low of 1 (Lake County) to a high of 1,298 (Bent County). The more populated areas along the Front Range have CDD ranges from the low 200's to around 900's. Due to the variance in climatic zones, use of site specific audits is necessary to capture this variety and properly apply measures.

HDD & CDD data from weather stations around the State of Colorado is used in the Colorado subgrantee allocation formula. Data is used from 6 weather stations operated at:

Denver: Lat = 39.57 / Long = -104.85, Elevation = 5,882.55

Colorado Springs: Lat = 38.83 / Long = -104.72, Elevation = 6,201.12

Pueblo: Lat = 38.29 / Long = -104.52, Elevation = 4,684.06

Grand Junction: Lat = 39.12 / Long = -108.53, Elevation = 4,839.9

Eagle: Lat = 39.66 / Long = -106.92, Elevation = 6,497.05

Leadville: Lat = 39.22 / Long = -106.32, Elevation = 9,927.82

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

All weatherization work completed is consistent with CEO WAP DOE approved energy audits per Appendix A of 10 CFR 440, and WPN 22-4. Per WPN 22-4, CEO WAP has developed and implemented the Colorado Standard Work Specifications (SWS) which provides the benchmarks and standards for home energy upgrades in accordance with the Standard Work Specification standards developed by the National Renewable Energy Laboratory (NREL) and the Department of Energy (DOE). The SWS does not prescribe specific actions, materials, or techniques that must be used by subgrantees or subcontractors in order to achieve energy conservation goals. Instead, the SWS provides subgrantees and subcontractors the minimum set of requirements necessary to achieve the desired energy efficiency outcomes.

CEO WAP has language in subgrantee contracts that outlines the expectations for work quality and instructs subgrantees to include these expectations in any contracts entered into with contractors and vendors. All subgrantee agreements and vendor contracts contain language which clearly references the SWS for work quality outlined in WPN 22-4. This language is as follows:

- Colorado Energy Office (CEO) Weatherization Assistance Program (WAP) Colorado Field Guide Site Built and Manufactured Housing, Colorado Field Guide - Multifamily, and CEO WAP Policies and Procedures shall apply to the Grantee and their subcontractors providing WAP services through CEO WAP in order to ensure consistency in work quality.
- These regulatory documents are not intended to abridge safety, health, environmental, or local codes or other ordinances. In such circumstances where there are conflicts the more stringent of rules shall apply.
- The health and safety of the clients, Grantee staff, Grantee subcontractors and the integrity of the building structure shall not be compromised by any work completed with CEO WAP funds.
- The Grantee, CEO WAP, has overall responsibility for proper implementation of the procedures and for the quality control of all repair and energy conservation work.
- All installed WAP materials shall meet the materials standards taken from Appendix A of 10CFR440, Title 10 Part 440 of the US Department of Energy's (DOE) WAP for Low-Income Persons, and shall be of good quality, and shall be installed in a safe, cost-effective manner
- Work not meeting quality expectations may be subject to findings, re-inspections, go-backs, and disallowed costs, as determined by the CEO WAP with reference to 10CFR440 and CEO WAP Policies and Procedures.
- A Risk Assessment was completed per WAP Request for Applications (RFA) #CEO-WAP-2024, 2 CFR 200.332, and CEO WAP-601. The individual assessments are included as Attachment 1 and shall be considered as part of future Fiscal and Administrative Monitoring requirements and activities.

All technical guides and materials are posted on the WAP Intranet site. All subgrantees have access to this site where policy documents, field guides, and other resources are posted. CEO WAP confirms that subgrantees have reviewed and read all technical guides and policy documents through monthly check-ins at the beginning of the Program Year.

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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: NEAT
Approval Date:

Audit Procedure: Manufactured Housing
Audit Name: MHEA
Approval Date:

Audit Procedure: Multi-Family
Audit Name: Other (specify)
eQUEST and TREAT are both used.
Approval Date:

Comments

<p>SUBMITTAL OF AUDIT PROCEDURES</p> <p>Per WPN 23-6 and 10 CFR 440.21(i), CEO WAP Quality Management (QM) Team will resubmit their energy audit procedures, and priority list, as applicable, to DOE for approval every five years. If the CEO WAP energy audit procedures are found to be out of compliance with this requirement, a corrective action plan will be submitted with this grant application as designated by a DOE Project Officer. Per WPN 23-6, CEO WAP QM Team will submit energy audit approval requests at least six months in advance of the current expiration date. CEO WAP will provide a statement in the grantee State Plan indicating commitment to comply with this requirement.</p> <p>As the DOE specifically requires energy audit procedures to be separately developed and approved for use on site built single-family homes and manufactured homes, CEO WAP uses the appropriate energy audit procedures further described below.</p> <p>STANDARD ENERGY AUDIT PROCEDURES</p> <p>Energy audits will be performed using Weatherization Assistant for both site built and manufactured homes. In the event that a home is a combination of a site built or modular home and a manufactured home, subgrantees must contact CEO to determine which audit tool to use.</p> <p>Subgrantees must assess for the following three components as a part of the standard audit:</p> <ol style="list-style-type: none">1. Incidental Repair Measures – Per WPN 19-5, an Incidental Repair Measure (IRM) is a repair that is necessary for the effective performance or preservation of weatherization materials. IRMs require cost justification through the electronic energy audit however they are not to be included with the cost of an Energy Conservation Measure (ECM). Written justification and photos for the necessity of the repair must be in the client file and the repair must be associated with an ECM identified on the Recommended Measures Report.• All incidental repairs must be completed according to SWS standards, if applicable. If an IRM has no associated SWS procedure, subgrantees and subcontractors are required to document the incidental repair measure and install the IRM per CEO WAP Program Guidance and SWS.• If neither a SWS, nor a CEO WAP Program Guidance exists for the installation of the IRM, subgrantees and subcontractors must install the IRM using industry best practices.2. Energy Conservation Measures – Per WPN 19-5, ECMs are a procedure, including weatherization materials installation, which are considered or performed for its anticipated energy savings.
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- Per WPN 22-7 and Colorado WAP Policy & Program Guidance, all measures must be cost tested as energy conservation measures by the energy audit. If they do not rank and meet the criteria for “at-risk” clients, certain equipment replacements, such as furnaces and water heaters, may be replaced under the Health and Safety category.
- All approved ECMs that achieve a Savings to Investment Ratio (SIR) of 1.0 or greater MUST appear on the Recommended Measures Report.
- 3. Health and Safety Measures – Per WPN 22-7, Health and Safety measures are those measures that are necessary to maintain the physical wellbeing of both the occupants and/or weatherization workers. The actions must be taken to effectively perform weatherization work or the actions are necessary as a result of the weatherization work. Subgrantees are required to:
 - Identify all health and safety deficiencies as a part of the initial audit. These health and safety measures must be identified in the work order and completed prior to beginning the installation of any IRM or ECM.
 - Document all hazards, concerns, questionable situations, etc. as part of the standard audit. Make sure digital images can be linked back to the job. WPN 22-7 defines the activities allowed as Health & Safety.

AUDIT PROCEDURES FOR MULTIFAMILY UNITS

Per DOE funding regulations, CEO WAP and its subgrantees will abide by the standards set forth in regards to the total production totals compared to total multifamily production totals. In the event that multifamily units represent more than 20 percent of Colorado WAP’s total DOE production for a program year, CEO WAP will submit to a multifamily energy audit tool and procedures by a WAP Project Officer.

In recent years, DOE multifamily unit production has fallen below 20 percent of total DOE production. For now, all multifamily units, building, and project proposals will be submitted for consideration to a DOE PO to obtain approval on a case-by-case basis. When considering all multifamily projects an approved multifamily energy audit tool will be used by the subgrantee and CEO WAP QM staff.

APPROVAL PROCEDURE FOR MULTIFAMILY PROJECTS

All subgrantees submitting multifamily projects for approval must use the “WAP Multifamily Submittal Checklist” provided by DOE, which provides guidance on required documentation, for both centrally and individually heated projects. Detailed administrative and technical requirements are provided in the checklist.

SAVINGS TO INVESTMENT RATIO

As detailed in 10 CFR 440.21(c), in order to provide cost effective service, all assessed energy efficiency measures must meet the conditions as outlined in 10 CFR 440, Appendix A, and achieve a savings to investment ratio (SIR) of at least 1.0 or greater. All mandatory assessment measures that meet the SIR of 1.0 or greater must be installed by subgrantees or subcontractors. Braided funds may be used to install measures less than an SIR of 1.0 provided that the Cumulative SIR is 1.0 or greater. The entire measure that is installed with braided funds would be paid for with non-DOE funds. Co-funding of a measure is not allowed.

NON-ENERGY IMPACTS OF WEATHERIZATION

CEO WAP will continue to capture the Social Cost of Carbon (SCC) in the cost effectiveness of energy efficiency measures by increasing subgrantee fuel costs, determined using the DOE national average values, by the SCC fuel price modifier in our energy modeling for program year 2025. This will be done by utilizing the methodology provided by DOE for including the SCC in the Weatherization Assistant 10 energy audit tool. CEO WAP policy and procedures require subgrantees to utilize the SCC fuel price modifier in the initial evaluation and site-specific energy modeling as long as the use of these modifiers does not result in the negative impact toward a weatherization client incurring a net increase of cost in out of pocket energy expenses.

The exact fuel price modifier to be used for each fuel analyzed is as follows:

- Electric emissions add 1.80 cents/kilowatt hour (kWh) to electric costs (\$0.0180/kwh).
- Natural Gas (NG) emissions add 29.10 cents/therm to NG costs (\$0.2910/therm).
- Liquid Propane (LP) emissions add 31.63 cents/gallon to LP costs (\$0.3163/gallon).
- Distillate Fuel Oil/Kerosene emissions add 56.05 cents/gallon to oil/kerosene costs (\$0.5605/gallon)

BUILDING SHELL & AIR SEALING

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Building shell and air sealing of a unit creates a separation between the interior and exterior environments and slows air flow, increasing energy efficiency through heat loss reduction. In addition, this prevents particulate matter from the outside from entering the unit. Subgrantees and/or subcontractors are required to follow the SWS for the following building shell and air sealing measures that are within the scope of CEO WAP:

1. Attic Penetrations and Chases
2. Open Stairwells
3. Dropped Ceiling and Soffit
4. Windows and Doors
5. Basement and Crawlspc
6. Attached Garages
7. Ducts

INSULATION

Insulation is building material that slows heat flow to create a separation from interior and exterior environments. This aids in heat retention, which lowers the cost of home energy. Subgrantees and/or subcontractors are required to follow the SWS for the following Insulation measures that are within the scope of CEO WAP:

1. General Requirements
2. Attic Insulation General Preparation
3. Knee Walls
4. Attic Openings
5. Walls
6. Floors
7. Basements and Crawl Spaces
8. Duct Insulation

HVAC

HVAC is the technology of indoor environmental comfort. Its goal is to provide thermal comfort and acceptable indoor air quality. Subgrantees and/or subcontractors are required to follow the SWS for the following HVAC measures that are within the scope of CEO WAP:

1. General Requirements
2. Combustion Safety Requirements
3. Forced Air Furnace Replacements
4. Warranty

VENTILATION

Ventilation is the mechanical system or equipment used to circulate air or to replace stale air with fresh air. Subgrantees and/or subcontractors are required to follow the SWS for the following ventilation measures that are within the scope of CEO WAP:

1. Ventilation Assessment Requirements

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2. ASHRAE 62.2.2016
3. Installation
4. Inspection
5. Client Education
6. Dryer Venting/Ducts
7. Supply
8. Whole Building

BASELOAD

Baseloads are the common appliance related energy costs that are common to units. Subgrantees and/or subcontractors are required to follow the SWS for the following baseload measures that are within the scope of CEO WAP:

1. Refrigerator
2. Water Heating General Items
3. Water Heater Insulation
4. Water Pipe Insulation
5. Water Heater Replacement
6. Water Use Reduction
7. Lighting
8. Rooftop Photovoltaics

INSPECTION REQUIREMENTS

The following inspection requirements constitute the minimum standards by which all subgrantees and subcontractors should assess all previously listed policies:

1. Subgrantee Quality Control Inspection
2. Client File Documentation
3. Quality Complaints
4. State Monitoring General Requirements
5. State Monitoring Field Visit Requirements

MISCELLANEOUS REQUIREMENTS

Miscellaneous Requirements are managerial and programmatic requirements that are not necessarily related to the installation of measures. They include: general program requirements, state and technical waiver requirements, subgrantee subcontract requirements, and training and certification requirements:

1. Multifamily Requirements
2. Multifamily specific requirements for individually and centrally heated multifamily units

COMMUNICATION OF GUIDELINES AND STANDARDS

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Communication of Colorado Standard Work Specifications Guidelines and Standards (SWS), including updates, training plans, implementation schedules, and all other associated training and technical documents is the responsibility of CEO WAP Quality Management Team. The new or updated SWS will be communicated via email in the form of an electronic memorandum to each subgrantee's Executive Director or Program Manager, with all subgrantee trainers copied on the memorandum. This electronic memorandum will, at a minimum:

1. Identify the approved changes to the SWS
2. Identify the dates the changes will be effective
3. Identify any additional training for the new policies and procedures scheduled by the CEO WAP Quality Management Team

CEO WAP staff will require that the Executive Director or a Program Manager of each subgrantee sign and return the electronic memorandum to CEO WAP Quality Management Team, acknowledging receipt of the updated SWS. It is the responsibility of the Executive Director/Program Manager and/or trainers to distribute the updated SWS sections to their respective subgrantee personnel and crews. In the event that subcontractors are hired by the subgrantees to perform weatherization work, subgrantees are responsible for providing subcontractors with the SWS and to ensure that all work performed by subcontractors meets the specifications and standards identified within the SWS. A sample of subcontractor contracts will be reviewed during the Administrative Monitoring to ensure subgrantee compliance with this requirement.

In addition to the electronic memorandum, CEO WAP staff will update the controlled copy of the SWS that exists on the CEO WAP database within 10 business days of issuing the electronic memorandum. This is done so that all subgrantees and subcontractors may reference the most current version of the SWS at all times.

If SWS requirements are changed in the future by the DOE, CEO WAP will send confirmation to the DOE Project Officer responsible for Colorado that CEO WAP acknowledges these changes in the SWS requirements, has issued an electronic memorandum to all subgrantees identifying the changes, and that the controlled copy of the SWS on the CEO WAP database has been updated to reflect these changes. CEO WAP will submit a variance request pertaining to any new SWS requirements, via the standard variance procedure, to the DOE Project Officer, if CEO WAP feels it is warranted.

WORK QUALITY CONTRACT LANGUAGE

Per WPN 22-4, CEO WAP is required to include language in all subgrantee contracts that identify the requirements for work quality. CEO WAP developed the following work quality language beginning in PY15-16 that will be included in all PY25 subgrantee contracts scopes of work:

1. CEO WAP Weatherization Field Standards in the SWS and CEO Weatherization Policies and Procedures shall apply to the grantee and their subcontractors providing weatherization services through CEO WAP in order to ensure consistency in work quality.
2. These regulatory documents are not intended to abridge safety, health, environmental, or local codes or other ordinances. In such circumstances where there are conflicts the more stringent of rules shall apply.
3. The health and safety of the clients, grantee staff, grantee subcontractors and the integrity of the building structure shall not be compromised by any work completed with CEO WAP funds.
4. The Grantee, CEO WAP Administrator, has overall responsibility for proper implementation of the procedures and for the quality control of all repair and energy conservation work.
5. All installed WAP materials shall meet the materials standards taken from Appendix A of 10CFR440, Title 10 Part 440 of the US Department of Energy's (DOE) WAP, , and shall be of good quality, and shall be installed in a safe, cost-effective manner.
6. Work not meeting quality expectations may be subject to findings, re-inspections, go-backs, and disallowed costs, as determined by the CEO WAP with reference to 10CFR440 and CEO WAP Policies and Procedures.

FLOW-DOWN REQUIREMENTS

Per WPN 22-4, all subgrantee contracts signed with subcontractors will contain language which clearly states that subcontractors must meet all the requirements contained within the SWS, as well as CEO WAP policies and procedures.

CONFIRMATION OF RECEIPT

Per WPN 22-4, CEO WAP will use the signature on the contract as the method by which a subgrantee confirms receipt.

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V.5.3 Final Inspection

CEO WAP has decided to utilize an independent Quality Control Inspector (QCI) model in which the subgrantee or subcontracted QCI is not permitted to have had any prior involvement with the unit being inspected. CEO WAP complies with all final inspection requirements outlined in WPN 22-4.

SUBGRANTEE QCI STAFFING LEVELS

Subgrantee QCI staffing levels should be commensurate with subgrantee needs based on a combination of size, funding, and unit production. Although CEO WAP does not require a subgrantee to have a specific number of QCI on staff, CEO WAP does require that all subgrantee employees who conduct Final Inspections of units be QCI certified. Subgrantees are required to have policies and procedures in place to address subgrantee shortages of QCI. All subgrantees have adequate capacity of QCIs.

SUBGRANTEE QCI FINAL INSPECTION

All units reported as completed by a subgrantee must receive a final inspection from a subgrantee QCI, or third party QCI if needed. The QCI must ensure that all work meets the minimum specifications as outlined in the SWS and must meet the applicable standards as found in 10 CFR 440. Units are deemed to be completed by CEO WAP once a QCI has determined that all incidental repair measures, energy conservation materials, and any necessary health and safety repairs have been installed in compliance with SWS standards and all installations meet all DOE SWS standards, if applicable. QCI are responsible for ensuring all materials have been accurately reported on the Building Weatherization Report (BWR), and that all energy savings measures listed on the BWR reflect accurate cost estimation. Inspectors are required to ensure accurate reporting of all measure costs, materials, and fuel types for all jobs in Weatherization Assistant Web-based or approved multifamily auditing software.

All client files must include a form, signed by a QCI for the unit, signifying that all weatherization work performed by the subgrantee has met all applicable SWS or NREL SWS Standards. A QCI Final Inspection Report must include an assessment of the original audit, confirmation that the measures called for on the work order were appropriate per the audit procedures and protocols approved by the DOE, a record of final diagnostic testing, and that all measures costs were reported accurately.

SUBGRANTEE QCI CORRECTIVE ACTION PROCEDURES

Per DOE WPN 25-1 and WPN 22-4 "Quality Work Plan Requirement Update," a subgrantee QCI "who repeatedly fails to perform to program expectations must be disqualified from performing work in the future. Grantees must establish protocols to remove poor performers from their network." Also, subgrantees must establish internal protocols to remove poor performing QCI contractors from the network. When a subgrantee QCI fails to adequately inspect to the most recently approved SWS, they will be subject to the following corrective action procedures:

- Corrective Action-Removal Procedures are dictated by the number of Quality Assurance (QA) identified defects of similar nature requiring corrective action that can be directly tied back to a specific subgrantee QCI during a single QA visit over a two-year program period
 1. First QA identified corrective action defect of similar nature: Subgrantees shall fix issues using non- DOE funds and conduct classroom training within the subgrantee for the inspector prior to them performing subsequent inspection work within the network.
 2. Second QA identified corrective action defect of similar nature: Subgrantees shall fix issues using non DOE funds, conduct classroom training outside of the subgrantee, and supervised on-the-job training for the inspector prior to them performing subsequent inspection work within the network.
 3. Third QA identified corrective action defect of similar nature: Subgrantees shall fix issues using non-DOE funds, suspend the inspector from performing inspections for a six month period from the date of inspector notification, and have the inspector complete a QCI performance plan during the suspension period prior to them performing subsequent inspection work within the network.
 4. Fourth QA identified corrective action defect of similar nature: Subgrantees shall fix issues using their own funds (not from any Weatherization grant) and then permanently disqualify the applicable inspector from performing all future inspection work within the network.
- Corrective Action-Removal Procedures Tracking
 1. Subgrantees are responsible for tracking where each impacted inspector is within the process outlined above. If subgrantees suspend or permanently disqualify an inspector, they shall notify a CEO Manager responsible for Quality Assurance via email. Prior to hiring and providing subsequent QCI work to an inspector, subgrantees are responsible for checking with the Quality Manager to ensure that the inspector is not

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suspended or permanently disqualified.

The corrective action-removal procedures listed above are outlined in CEO WAP Policy 602, Corrective Action-Removal Procedures. Additionally, per WPN 11-3, if a DOE funded unit has received a final inspection, subgrantees cannot return and expend DOE funds for corrections.

PROCESS FOR VALIDATING SUBGRANTEE CERTIFICATIONS

In accordance with WPN 22-4, CEO WAP has developed a comprehensive process for ensuring that all subgrantees acquire and maintain Building Performance Institute (BPI) QCI certifications for all inspectors. All subgrantees are required to include a list of all QCI that are on staff, as well as the date that each Inspector's existing certification expires, as a part of their annual Training Plan. These Training Plans are to be submitted as a required component of each subgrantee's annual Competitive and/or Noncompetitive RFA Applications. CEO WAP staff review all Training Plans to ensure compliance with this requirement. Competitive or noncompetitive applications missing these requirements will not be accepted by CEO WAP staff.

In addition to checking subgrantee Training Plans, CEO WAP Quality Management Team will use the BPI certification database to periodically check that each employee identified by a subgrantee as having a current QCI certification on their Training Plan is QCI certified at the time of the Training Plan submission. If the CEO WAP Quality Management Team find that either an individual listed as an Inspector on the Training Plan does not have a current QCI certification, or that an existing certification has expired and has not been renewed, CEO WAP Quality Management Team will issue an electronic memorandum to the subgrantee director or Program Manager, and copy all Trainers, that the employee needs either certification or recertification. A subgrantee representative (either the Executive Director, a Program Manager, or a Trainer) must respond within 30 business days with a plan to certify the individual. Subgrantees are prohibited from allowing Inspectors without a current QCI certification to conduct Final Inspections of any units. Subgrantees who fail to comply with this requirement are subject to the Policies to Address Subgrantee Noncompliance listed later within this section.

SUBCONTRACTOR QCI STAFFING LEVELS

Recognizing that subgrantees may encounter situations in which subgrantee QCI staffing levels are not adequate to meet production needs, CEO WAP will allow independent, third party subcontractors to perform QCI provided that the subcontractor has a current QCI certification.

SUBCONTRACTOR QCI INSPECTIONS

In the event that subgrantees utilize a contractor to perform final inspections, the subgrantee must ensure that those contractors possess a QCI certification and will inspect to the level required by the SWS as outlined in the SWS.

PROCESS FOR VALIDATION OF SUBCONTRACTOR QCI CERTIFICATION

Subgrantees are responsible for ensuring subcontractors have a current QCI certification at the time the work is performed. Subgrantees who allow non-QCI certified subcontractors to perform Final Inspections are subject to CEO WAP noncompliance procedures and may have all costs associated with that job disallowed.

CEO WAP QCI STAFFING LEVELS

CEO WAP currently operates under the Independent QCI Model, which requires CEO WAP Quality Management Team to perform QCI Inspections of a minimum of 5% of units reported as completed using DOE funds across the State. Currently, CEO WAP Quality Management Team has five staff members and four CEO WAP Quality Management Team members have successfully received their QCI certifications, or recertifications, and are able to conduct inspections on all DOE funded units beginning July 1, 2025.

CEO WAP STAFF QCI INSPECTIONS

CEO WAP staff are required to conduct onsite examinations of subgrantee and subcontractor work on 5% of DOE funded units designated as complete by subgrantees. These onsite audits are inspected to ensure that all weatherization work has been done in accordance with SWS and CEO Policies, and to assess subgrantee inspector effectiveness and knowledge. QCI certified CEO WAP staff members will sign a Final Inspection Form indicating that the job has been inspected by a CEO WAP QCI and has passed all QCI requirements. This document has been developed by CEO WAP and is available for DOE Project Officer review at their request.

PROCESS FOR VALIDATION OF CEO WAP STAFF QCI CERTIFICATIONS

Any CEO WAP Quality Management Team member doing Quality Assurance inspections is required to be QCI certified and is responsible for all certification and recertification. Proof of QCI Certification and recertification of all CEO WAP Quality Management Team are available to the assigned DOE Project Officer as requested.

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POLICIES TO ADDRESS SUBGRANTEE NONCOMPLIANCE

Per 2 CFR 200.338, if a subgrantee fails to comply with any term of an award as stated in Federal or CEO WAP policies and procedures, the subgrantee may be subject to one or more of the following actions:

1. Temporarily withhold cash payments pending correction of the deficiency.
2. Disallow all or part of the cost of the activity or action not in compliance.
3. Wholly or partly suspend or terminate the current award.
4. Withhold further awards.
5. Board notification and required response from the Board.
6. Take other remedies that may be legally available.
7. May result in reallocation of funding or production to another CEO WAP contracted entity.

If a subgrantee has a repeated history of poor performance, financial instability, mismanagement, violates the terms and conditions of the Cooperative Agreement (contract), or is irresponsible in administering the Weatherization program, CEO WAP may impose additional requirements needed in the following manner:

1. Subgrantees will be notified in writing (mail or electronically) as to the special conditions.
2. Reasons why the special conditions are being imposed.
3. Nature of required corrective action.
4. Time allowed for completion of the corrective action.

The standard CEO WAP grievance procedure can be requested by the subgrantee at any time. Once the special conditions have been corrected to the satisfaction of CEO WAP they will be removed.

In addition to the above remedies, funding may be suspended in whole or in part by CEO WAP for frequent or repeated violations as well as financial mismanagement. In such a case written notification will be sent to the subgrantee and DOE stating the reasons for suspension, the effective date, and in the case of a partial termination the reduced or modified portion of the funding. Should termination of a subgrantee contract be determined the following steps will be taken:

1. Notification in writing and effective date of termination to the subgrantee.
2. Complete inventory of all tools, materials, equipment and capital equipment will be conducted.
3. All grant purchased items (capital equipment, computers, tools, inventory, etc.) will be removed from the premises.
4. Close out procedures will begin.
5. All other actions will be determined by the CEO WAP Director.

In addition to these noncompliance measures, standard contract language included in each subgrantee's contract further outlines the remedies available to the State of Colorado.

MULTIFAMILY INSPECTOR TRAINING

A three week long Multifamily Quality Control Inspector Training and Certification course was completed on March 15th, 2019. Santa Fe Community College, EnergySmart Academy, an Interstate Renewable Energy Council (IREC) accredited training entity, provided a two week online, one week in-person training, proctoring, and certifications. CEO Quality Control Inspectors attended, tested out, and received certification. The training course covers most of the Job Task Analysis (JTAs), but it is not an Interstate Renewable Energy Council (IREC) Accredited certification. Due to turnover at the designated centrally heated multifamily subgrantee another course will be organized for new staff and to act as a refresher, and for staff that went through the previous training. When the

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Multifamily QCI requirements become effective, subgrantees doing multifamily work will review the requirements, develop a compliance plan, attain the specific multifamily QCI certification needed, and ensure compliance via only having those who attain the specific multifamily QCI certification inspect their projects. CEO WAP Policy requires the following:

Per CEO WAP Policy 609.6.2.4, Subgrantees must use a properly trained and certified BPI QCI to perform a final inspection for single family and individually heated multi-family units. Centrally heated multi-family units must be inspected by a properly trained competent Agency Inspector.

V.6 Weatherization Analysis of Effectiveness

CEO WAP utilizes a three-pronged approach to assess subgrantee effectiveness in relation to overall program administration and performance. This four-pronged approach allows CEO WAP staff to conduct multifaceted analysis of the program that allows CEO WAP to use historical performance and current program trends to identify and mediate any potential issues that might impact the program in the future. CEO WAP believes that this process leads to long-term program stability, effective and responsible utilization of taxpayer funds, and overall program health. The three methods used by CEO WAP staff to evaluate program effectiveness include:

1. Evaluating subgrantees in regards to specific performance indicators
2. Evaluating subgrantees' risk in relation to proper administration of grant funding through a Risk Management Assessment
3. Analyzing performance in relation to other subgrantees with similar subgrantee profiles

The following sections provide greater detail as to how CEO WAP staff use each of these four methods to evaluate subgrantee and program effectiveness.

PERFORMANCE INDICATORS

Using previous program year data, CEO WAP has identified the following five performance indicators that generally can be used to assess subgrantee effectiveness and overall program success. These performance indicators are:

1. Efficient Spending of DOE Funds – Subgrantee effectiveness is largely determined by the full and efficient spending all allocated DOE funds within a designated program year. Subgrantees that consistently bill to the grant show proper use of ASHRAE testing and installation requirements, proper allocation of subgrantee resources, effective use of funds, proper program administration, proper understanding of allowable and disallowable costs, and successful implementation of the program in general. From a top-level perspective, subgrantee spending of DOE funds in a responsible manner ensures program continuity in future funding cycles, which assists in the overall health of CEO WAP.
2. Per Unit Average (PUA) – Program effectiveness is also determined by how well subgrantees are able to meet or better their target PUA for DOE allocated funds. Subgrantees that meet or better their target PUA show proper financial and program administration, as well as a fundamental understanding of allowable and disallowable costs. Subgrantees are consistently compared to their historical PUA to identify trends around efficient unit production. Issues such as spikes in costs, or growth in labor charged to the grant are assessed to identify deficiencies or trends that may show that subgrantees are not conducting work effectively.
3. Unit Production – The third component that determines subgrantee effectiveness is how successful subgrantees are at providing high quality weatherization services to low income citizens of Colorado. This unit of effectiveness is measured by how many high quality, cost effective units a subgrantee is able to complete in a given program year. Subgrantees are allocated contractual targets based on a standard formula of total DOE budget/PUA and are assessed on their ability to meet these targets. Subgrantees that meet or exceed proposed production trends are deemed more effective and show greater program administration than those which lag in their proposed production targets.
4. Service in all 64 Colorado Counties – Due to the significant amount of leveraged funding that Colorado receives, it is increasingly important to ensure service to all 64 Colorado counties. CEO WAP requires that each county receive a minimum of one weatherized unit per program year. Service to all 64 counties in Colorado shows proper use of the prioritization requirements, proper administration of program dollars and ensures overall program health.
5. Quality Installation of Weatherization Materials – Subgrantees are also assessed on how effectively they utilize DOE funding to perform quality installation of weatherization materials. This performance indicator is assessed using the following four metrics as identified below.
 - o Site Visits: The site visits provide CEO WAP staff an opportunity to assess not only the quality of the work, it also allows CEO WAP staff to assess subgrantee compliance with SWS Field Standards and CEO WAP policies and procedures. This provides CEO WAP staff an opportunity to provide real time training to subgrantee field staff in both the SWS and CEO WAP policies and procedures to enhance the program.

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- Utilization of the CEO WAP database: All installed measures on a home are collected through CEO WAP database and can be sorted, compared and evaluated in real time. This data provides insights regarding costs per unit, costs related to field functions or office functions, types of energy efficiency and health/safety measures being performed and their relative frequencies, and beginning and ending air leakage rates. CEO WAP monitors this data to determine if agencies are under performing or lacking proficiency in any one area. This data, along with the site visit information, provides a starting point for empirical and qualitative assessment of the effectiveness of the work being performed.
- Quality Assurance Reports: Following a site visit, CEO WAP staff examines past quality assurance monitoring reports to identify recurring quality deficiencies within specific measures and/or processes. This process allows for the identification of Specific Training needs for specific subgrantees and also allows CEO WAP staff to identify issues that may occur across the entire subgrantee network, which could lead to additional Specific subgrantee network training as needed. This allows the subgrantee network greater program knowledge and a path to continuous improvement.
- Communication with Subgrantees: CEO WAP staff is in continuous communication with subgrantee staff on waiver requests, question and answers, T&TA calls and T&TA meetings. Frequently, the training needs of a subgrantee are best understood by themselves and are expressed accordingly. This interaction, and the information gathered from it, is vital to determining the training needs of agencies and their staff and to assess the overall health of the program.

RISK MANAGEMENT ASSESSMENT

Per CEO WAP policy, each subgrantee undergoes a Risk Management Assessment that classifies each subgrantee as either a low, medium, or high risk to CEO WAP, and by extension, all CEO WAP funding partners. This comprehensive Risk Management Assessment includes a detailed review of all aspects of subgrantee organizational methods, financials, work quality, including the following risk factors as outlined in standard CEO WAP policy. These risk factors include:

1. Substantial financial or programmatic mismanagement is documented utilizing but not limited to the Fiscal and Administrative Monitoring Reports.
 - “Substantial” is defined as disallowed costs of a large dollar amount (generally \$1,000 or more, or of a repetitive nature).
2. Gross or deliberate neglect of generally accepted workmanship standards as evidenced utilizing QA Monitoring Reports.
 - “Gross neglect” is defined as frequently recurring corrective action item deficiencies that have not improved through additional training and guidance.
3. Production goals are not completed in a timely manner, according to the goals set forth in the current program year’s contract and as documented in monthly production reports.
4. Substantial noncompliance with applicable rules and regulations as documented in Administrative and Fiscal Monitoring, Quality Assurance Monitoring, monthly production reports, or monthly fiscal reports.

SUBGRANTEE PROFILE COMPARISON

CEO WAP also assesses a subgrantee’s effectiveness based on comparisons to other subgrantees with similar subgrantee profiles. These subgrantee profiles include elements that are not necessarily financial in scope, things such as heating degree days, population characteristics, size of territory served, region specific costs, budgets, subgrantee organizational structures, and many other elements that have a direct impact on how effective a subgrantee is in delivering service. By comparing subgrantees with similar subgrantee’s profile, CEO WAP can better identify subgrantee deficiencies, long term program trends, evaluate cost effectiveness of service, innovative best practices, and track the true financial and administrative impact of changes to CEO WAP and DOE policies and procedures. This allows CEO WAP to identify potential issues in advance and allows CEO WAP to continuously update and tailor the program to preemptively address these issues. This process leads to long term program stability, effective and responsible utilization of taxpayer funds, and overall program health. This process also allows for the identification of training needs that exist within the subgrantee network which allows CEO WAP to customize Specific training needs to support both national comprehensive training and standards as well as CEO WAP and industry best practice standards.

The WAP Quarterly Roundtable Group is another critical source of direction for CEO’s WAP. Each quarter, the Group will meet to ideate and problem-solve around the challenges and opportunities provided by the influx of funding and potential for capacity building. WAP Quarterly Roundtable group is tasked with providing recommendations and feedback around what they need from the program including, but not limited to, workforce development, beneficial electrification, cooling measures and fuel switching from natural gas to electric.

WORKFORCE EFFORTS

A Workforce Advisory Group is working to further address barriers to entry throughout Colorado WAP by ideating around the challenges and successes of recruiting from urban and rural Colorado communities, prioritizing issues around job quality, and sharing our resources and solutions. For PY25, the Workforce

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Advisory Group is focusing on Recruitment and Retention, Training, and Contractor Development. The Group intends to utilize the resources provided through the Green Workforce Connect and local workforce development centers. The Group is also collating workforce and training opportunities provided by Colorado's Department of Labor and Employment and other state offices dedicated to improving Colorado's green workforce. Each Colorado WAP subgrantee has also contracted its own workforce development manager or integrated workforce development tasks into a current staff member's job description. This is important for our workforce goals as each workforce development manager can develop the tools they need for reaching their specific communities, whether rural or urban, and so forth, rather than using a generalized strategy. The Colorado Energy Office has also designed and is officially sponsoring an Energy Efficiency Registered Apprenticeship Program within the WAP network. This registered apprenticeship has been implemented at two subgrantee offices with others planning to join throughout this upcoming year.

V.7 Health and Safety

Per WPN 22-7 and 10 CFR 440.16, allowable energy related Health and Safety (H&S) actions are those actions necessary to maintain the physical well-being of both the occupants and weatherization workers where costs are reasonable, and the actions must be taken to effectively perform weatherization work; or the actions are necessary as a result of weatherization work. No H&S measure can be performed in a home unless ECMs are also part of the scope of work.

Subgrantees are required to develop and implement detailed Health and Safety plans to ensure the health and safety of both workers and clients at all times. Subgrantee Health and Safety Plans must comply with all Occupational Safety and Health Administration (OSHA) regulations, all Colorado (SWS) Field Guide Health and Safety standards, all CEO WAP Health and Safety standards, as well as any other applicable State or Federal health and safety regulations. Subcontractors hired to perform weatherization work for a subgrantee are required to follow all Health and Safety standards as listed within the subgrantee's Health and Safety Plans and the SWS. CEO WAP complies with all health and safety requirements outlined in WPN 22-7.

H&S situations that are not covered by the H&S allowances in CEO WAP Policy and Program Guidance, require subgrantees to submit a waiver to CEO on a case by case basis. CEO requires details and digital documentation for the waiver and would approve or decline the request based on the details submitted. If the details are insufficient, CEO WAP would request additional information in order to make a decision. In the event that additional DOE funds would be needed to fulfill the request, CEO WAP would reach out to DOE WAP Program Officers prior to approving DOE funds. If the waiver request is something that is prohibited by DOE, CEO would suggest the use of non-DOE funds be used for the entire project or for the individual H&S measure utilizing the braiding of funds.

Subgrantees are required to adhere to the following SWS Health and Safety standards:

1. Subgrantee Responsibility
2. Safe Work Practices
3. Combustion Safety Testing
4. Moisture
5. Electrical
6. Warranty
7. Asbestos
8. Radon
9. Incidental Repairs
10. Lead
11. Pests/Unsanitary Conditions
12. Common Health and Safety Practices

See "PY25 Grantee Health and Safety Plan".

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V.8 Program Management

V.8.1 Overview and Organization

CEO WAP operates within the Colorado Energy Office (CEO). CEO WAP staff consists of:

Deputy Director: Dominique Gomez, M.B.A. & M.P.P.

Managing Director, Programs: Christian Willis

Director: Stephanie Insinna-Sahondo, M.A.

Associate Director: Brandon Watkins

Senior Quality Manager: Andy Cordova, QCI

Data Analyst: Elizabeth Lenox, M.S.

Program Manager: Thomas Rivers

Program Manager: LeAnna Warren

Senior Policy & Program Manager: Barbara Pazos-Brown, M.S.

Program Manager (communications): Erin Edwards

Program Associate (admin): Mitchell Foresman, M.S.

Quality and Technical Manager: Zac Stewart, QCI

Quality Specialist: Zebulon Clayton, QCI

Quality Specialist: Edwin Ayala, QCI

Training Manager: Jacob Wolff

Other CEO staff provide support to the Weatherization Assistance Program, such as CEO Executive Director, Will Toor, Procurement Director, Sara Graf, Director of Finance & Operation, Gregg Hefner, Senior Budget Analyst, Natalie Doerre, Accountants Alex Lopez and Edward Wanjira, and Office Manager, Eva Carlson.

ALLOCATION OF STAFF SALARY COLORADO PROGRAM YEAR 2024

Director: Admin 11.82%, T&TA 7.68%

Associate Director: Admin 11.82%, T&TA 7.68%

Senior Program Manager: Admin 11.82%, T&TA 7.68%

Program Manager: Admin 11.82%, T&TA 7.68%

Program Manager: Admin 11.82%, T&TA 7.68%

Program Associate: Admin 11.82%, T&TA 7.68%

Senior Contract Manager: Admin 11.82%, T&TA 7.68%

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Sr. Engagement Manager: Admin 11.82%, T&TA 7.68%

Program Manager (communications): Admin 11.82%, T&TA 7.68%

Sr. Budget and Policy Analyst: Admin 11.82%, T&TA 7.68%

Sr. Quality Manager: Admin 11.82%, T&TA 7.68%

Training Manager: Admin 11.82%, T&TA 7.68%

Quality and Technical Manager: Admin 11.82%, T&TA 7.68%

Quality Specialist: Admin 11.82%, T&TA 7.68%

Quality Specialist: Admin 11.82%, T&TA 7.68%

Climate Workforce Development Manager (½ year): Admin 11.82%, T&TA 7.68%

ALLOCATION OF STAFF SALARY COLORADO PROGRAM YEAR 2025

Director: Admin 11.82%, T&TA 7.68%

Associate Director: Admin 11.82%, T&TA 7.68%

Sr. Data Analyst: Admin 11.82%, T&TA 7.68%

Sr. Policy and Program Manager 11.82%, T&TA 7.68%

Program Manager: Admin 11.82%, T&TA 7.68%

Program Manager: Admin 11.82%, T&TA 7.68%

Program/Data Associate: Admin 11.82%, T&TA 7.68%

Contract & Budget Specialist: Admin 11.82%, T&TA 7.68%

Program Manager (communications): Admin 11.82%, T&TA 7.68%

Sr. Quality Manager: Admin 11.82%, T&TA 7.68%

Training Manager: Admin 11.82%, T&TA 7.68%

Quality and Technical Manager: Admin 11.82%, T&TA 7.68%

Quality Specialist: Admin 11.82%, T&TA 7.68%

Quality Specialist: Admin 11.82%, T&TA 7.68%

Direct Costs, including personnel, will be paid for partly by non-DOE funds.

V.8.2 Administrative Expenditure Limits

The following budgetary caps are not to be exceeded by CEO WAP and by extension all subgrantees:

1. No more than 15% of any DOE grant may be used by the grantee and subgrantees for administrative purposes.

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2. Not more than 7.5% may be used by CEO WAP for administrative purposes.
3. No less than 7.5% must be made available to subgrantees by CEO WAP.
4. CEO WAP may provide up to an additional 5% to subgrantees receiving grants of less than \$350,000 of new DOE money.
 - o Program income and leveraged resources that are used in the DOE Weatherization Program may be treated as appropriated funds, in which case these funds can be added to the total appropriated funds to determine overall administrative costs.

CEO WAP will perform a financial needs assessment to determine if any subgrantee receiving less than \$350,000 total funding in any program year requires more than 7.5% to cover administrative costs. All subgrantees will receive at least 7.5% of their allocation in the form of administration funds. For PY25 all subgrantee agencies will be funded at more than \$350,000 and therefore this is not a consideration.

V.8.3 Monitoring Activities

Per 10 CFR 440.12(b)(6), CEO WAP accomplishes oversight and monitoring of subgrantees by conducting annual administrative (programmatic and fiscal) and technical monitoring that allows CEO WAP staff with specialized knowledge in these specific areas to assess subgrantee compliance. Per DOE guidance, CEO WAP reserves the right to monitor more units than the baseline requirement for subgrantees who have significant deficiencies. CEO WAP monitoring staff is comprised of 6 employees who are responsible for conducting administrative monitoring of subgrantees in relation to financial and administrative functions, and four QCI-certified Trainers who are responsible for performing technical monitoring of subgrantees related to the installation of energy conservation measures and health and safety repairs in clients' homes. For PY25, the following individuals will conduct monitoring of CEO WAP's subgrantees:

CEO WAP Associate Director will be supervising the Administrative (Programmatic and Fiscal) Monitoring efforts. Program Managers will be leading the efforts, with support from the Program Associate, to complete Programmatic Monitoring for the following subgrantee agencies: Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, Energy Resource Center, and Energy Outreach Colorado Efficiency, LLC. Fiscal Monitoring will be led by a new Contract and Fiscal Specialist position. This Specialist will work with an external contractor to conduct CEO WAP's annual fiscal monitoring of all six subgrantees.

ADMINISTRATIVE MONITORING

CEO WAP's Administrative Monitoring consists of two parts: Programmatic Monitoring and Fiscal Monitoring.

1. PROGRAMMATIC MONITORING

Programmatic monitoring of all subgrantees is conducted by the CEO WAP Administrative Monitoring Team at a minimum of once per program year. During programmatic monitoring, each subgrantee's management of WAP is reviewed for compliance with DOE and CEO WAP policies and procedures. Within 30 days of the completion of a programmatic monitoring, a Program Manager is required to complete and submit to the subgrantees the standard CEO WAP Administrative Monitoring Report.

Programmatic Monitoring consists of three parts: required documents review and pre-interview questions (requested prior to visit), client file review (in-person), and an onsite interview.

Required Documents and Pre-Interview Questions:

The CEO reviews annuals such as job descriptions, organization chart, training plans, worker's compensation documentation, client complaint log, and pre-interview questions. Subgrantees' policies and procedures are also reviewed, including Client Appeals and Dispute Policy, Client Confidentiality Policy, Colorado Open Records Act Policy, Health and Safety Plan, Personnel Policy, and their Employee Handbook. The pre-interview questions are sent to subgrantees prior to the onsite visit. These cover organization information, client outreach and communication, HR policies, subgrantee staff policies, client confidentiality, health and safety, vehicles and capital equipment, and historic preservation.

Client File Review:

A minimum of 5% of all DOE funded client files are provided for review to ensure subgrantee compliance with DOE and CEO WAP client file requirements. This encompasses DOE Formula and Weatherization Readiness Funds. Each client file is monitored for required information that was adapted from DOE's WAP Memo 010-Client File Checklist. The checklist includes the following elements, as applicable:

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1. Unit Information (i.e.: job number, funding source, heating fuel, own or rent, priorities, structure type, year built)
2. Eligibility and Permission (i.e. application date, call-back and go-back documentation, client complaint and resolution documentation, client sign and date application, copy of valid ID, deferral information, lawful presence affidavit, permission form for client and landlord if renter, permission to photograph, prequalified or income qualified, subgrantee sign and date application)
3. Field Requirements (i.e. ASHRAE 62.2 calculation form, audit form, BWR accurate to application, combustion appliance zone (CAZ) summary, chemical sensitivity form, cost records and invoices, date of final QCI inspection, deviation documentation, duct testing, final inspection form, final QCI sign and date, health and safety inspection/notification form, HVAC system efficiency testing, mold/moisture assessment form, NEAT or MHEA audit/work order, NEAT or MHEA economic analysis report, permits, pre and post blower door tests, radon informed consent language/form, radon pamphlet received by client, and landlord if renter, refrigerator replacement form, state waivers, subgrantee waivers, suspected asbestos material inspection form, utility data consent forms, ventilation calculation form)
4. Renovate Right Procedures (RRP) (i.e. certified renovator certificate, lead safe pamphlet)
5. State Historic Preservation Office (SHPO) (i.e. historical documentation, historical property, required SHPO review)
6. NEPA (i.e. Unexempt measures completed, NEPA consultation, documentation)
7. Landlord Contribution or Other Contributions (i.e. type of contribution, contribution amount, date of landlord payment)

Onsite Interview:

The onsite interview is conducted by utilizing the CEO WAP administrative interview tool, which subgrantees receive prior to its use. The interview tool addresses:

1. HR Policies
2. WAP Intranet and WAP Materials
3. Client & Staff Education
4. Training Plans
5. Inventory
6. Production
7. Deferrals and Weatherization Readiness Funds (WRF)
8. Electrical Appliances (EA)
9. Previous Administrative Monitoring Action Items Status

Programmatic monitoring allows CEO WAP staff to disseminate efficiencies by identifying administrative best practices that can be shared with other subgrantees, thus, reducing functional program requirements where feasible, building in quality checks for administrative processes and procedures, and identifying ways of streamlining operations.

The Administrative Monitoring Report contains the following elements:

1. Introduction
2. Methodology
3. Administrative Monitoring Review
4. Client File Review
5. Action Items

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6. Subgrantee Acknowledgment and Performance Statement

Upon receipt of the Administrative Monitoring Report, subgrantees have 30 days for an authorized representative to sign the Administrative Monitoring Report, archive internally for future reference, and provide corrective action plans back to CEO WAP addressing all deficiencies identified during monitoring, per WPN 20-4. The corrective action plans must identify a process and resolution to address deficiencies and state a reasonable time period for resolution to occur, and what will be done to prevent it going forward.

Included in the Administrative Monitoring Report are details regarding deficient areas of client files. Subgrantees are required to develop action plans based on deficiencies and are required to regain compliance prior to the end of the program year. CEO WAP staff check to ensure that any issues that occur with client file documentation are corrected by the subgrantee in accordance with the severity of the violation.

ANTICIPATED PY25 PROGRAMMATIC MONITORING SCHEDULE

The schedule, which is subject to change, for PY25 is:

Region 1: NWCCOG, May 2026

Regions 2, 3, 4, 6, 8: ERC, March 2026

Region 5: Arapahoe, January 2026

Region 7: HRWC, May 2026

Region 9: Pueblo, February 2026

EOCE: June 2026

Additionally, CEO WAP will perform an annual review of subgrantee Financial Audits.

2. FISCAL MONITORING

The fiscal monitoring review consists of:

1. Review of General Ledgers
2. Documentation of purchases
3. Conflict of Interest
4. Procurement
5. Inventory
6. Insurance Coverage
7. Financial Management and Policy

Upon receipt of the Fiscal Monitoring Report, subgrantees have 30 days for an authorized representative to sign the Fiscal Monitoring Report, archive internally for future reference, and provide corrective action plans back to CEO WAP addressing all deficiencies identified during monitoring, per WPN 20-4. The corrective action plans must identify a process and resolution to address minor or major deficiencies and state a reasonable time period for resolution to occur.

Fiscal monitoring of subgrantees consists of a desk audit, review of fiscal related policy, and review of inventory and procurement practices. Subgrantees are given a questionnaire to discuss their financial practices and procedures. Subgrantees provide general ledgers for parameters (e.g. two months specified by CEO) and then CEO staff samples a percentage of the general ledgers in payroll, accounts payable, travel, and journal vouchers. The subgrantees are given a month to provide the back-up documentation for those samples. The general ledgers received from subgrantees also contain accounts receivable information and CEO staff reviews to ensure the payments received from CEO are booked appropriately.

ANTICIPATED PY25 FISCAL MONITORING SCHEDULE

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- December 2025 - Request for general ledgers and questionnaire shared; agencies receive one month and half to respond
- February 2026 - CEO staff review and clarifying questions sent to agencies
- March 2026 - Meeting review with agencies, fiscal monitoring letters sent out
- April 2026 - Responses due back from agencies

TECHNICAL MONITORING

QUALITY ASSURANCE INSPECTIONS

Technical monitoring of subgrantees allows CEO WAP Quality Management Team to assess subgrantee work in regards to the quality installation of weatherization materials, incidental repair measures and health and safety measures. The technical monitoring schedule typically begins in late August and runs through the end of June and is dependent upon when subgrantees report closed units for DOE jobs. When the subgrantee reports an adequate number of DOE jobs as being closed, members of CEO WAP Technical team inspect the work to ensure the work is being completed in accordance with DOE, CEO WAP, and SWS standards, policies, rules, and regulations.

A minimum of 5% of completed units receive an onsite inspection by the CEO WAP Quality Management Team. Work quality is assessed and recorded via Technical Monitoring Reports that are issued to each subgrantee by CEO WAP staff within 30 days of the visit, following a QA monitoring. These reports are used to identify areas of strength and weakness found during the QA visits, and identify quality issues related to the installation of weatherization materials. CEO WAP Quality Management Team classify inspected work into one of the following categories:

1. Major Deficiencies – Deficiencies constituting substantial noncompliance with CEO WAP Program Guidance or the SWS.
2. Minor Deficiencies – No deficiencies constituting substantial noncompliance with CEO WAP Program Guidance or the SWS.
3. Recommendations – Conditions observed that do not constitute substantial noncompliance with CEO WAP Program Guidance or the SWS.
4. Best Practice – Work installed or weatherization processes completed that are exemplary in nature.

Once the QA report has been completed, CEO WAP Quality Management Team forward the report to the appropriate subgrantee's designated point of contact, and request a signature indicating that the subgrantee has read the QA report in its entirety. The subgrantee has 30 days from receipt of the report to return a signed copy indicating the subgrantee has read the report, and, in the case of corrective action deficiencies, have developed an action plan for remedying all corrective action deficiencies.

QUALITY CONTROL INSPECTIONS:

The quality of the field work and client service is assessed by conducting onsite visits of homes served at various stages in the production process (during initial audits, while work is in progress, accompanying the subgrantee inspector, or after the home has been reported to the state as a completed unit).

This approach provides the greatest possible insights into the subgrantee's processes and how these processes might be affecting quality. Also, the opportunity to have a positive impact upon local performance is increased by interacting with the local field staff during the work, thus providing immediate feedback, rather than just communicating feedback to them indirectly via reports which are addressed to management staff. This will allow both state and subgrantee staff to ascertain the overall quality of measures and to recognize trends, both within the subgrantees' organization and throughout the state.

Statewide or region-wide problems will be addressed in group training and seminars. The specific needs of an individual subgrantee will be addressed through T&TA visits.

VIRTUAL TECHNICAL MONITORING PLANS

The virtual technical monitoring plan will only be used in the event of pandemic level shut downs as in the case of COVID-19. In the event that this is ever required, CEO will reach out to DOE and receive approval from the DOE Project Officer(s) prior to the implementation of any virtual monitoring activities.

TECHNICAL MONITORING (FINAL INSPECTION BY GRANTEE):

Virtual Technical Monitoring would consist of receiving the contents of the client file before the virtual site visit. The file review would be completed, and any questions or comments noted so the grantee monitor could respond during the virtual site visit. For the actual site visit, we would have the subgrantee conduct a live streaming application so the grantee monitor could observe the completed work and all diagnostic testing. We would be using all the same forms, checklists,

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and procedures we do when on site. This virtual technical monitoring will be conducted to satisfy the grantee final inspection requirement (5%) of completed units.

Step Process:

1. A completed unit that needs a final inspection is selected and the client file is sent to grantee staff electronically.
2. The monitors view the contents of the file and view the home via Google Earth if available. Notes are made in preparation.
3. The subgrantee is present for the final inspection and will video call the grantee monitor from the vehicle when they arrive on site.
4. The subgrantee conducts the inspection, and holds the device for very clear and focused zooming on the inspection that is being done. The subgrantee may have more than one device on hand as a backup if the first one battery life is not long enough to support the entire final inspection. The subgrantee describes each activity like they would during a proctored field exam.
5. Everything that the subgrantee would normally do is completed and video streamed with the grantee monitor. The grantee will ask the team of inspectors to slow down, stop, explain, or show a closer shot of certain measures as needed.
6. The diagnostic testing is highly important, and the camera must be angled to clearly see the meters, gauges, location of testing, and appliance operation. It is assumed this will take the most time of the inspection.
7. As the final inspection is ending, the grantee monitor gives the inspectors an opportunity to address anything they might have missed.
8. If it appears the home is being left in an unsafe manner, the grantee monitor alerts the inspectors so that it can be corrected, and notations are made for the monitoring letter. Observations are made about how the inspectors addressed problems with the work or missed opportunities.
9. The final inspection visit is compared to the client file, and technical tool for consistency as the final inspection procedures are concluded.

QUALITY CONTROL INSPECTIONS (WORK IN-PROGRESS):

The virtual Technical Monitoring for work-in-progress jobs would consist of subgrantee staff conducting a live streaming application with the grantee monitor could observe the work being performed and view any diagnostic testing. We would be using all the same forms, checklists, and procedures we do when on site.

Step Process:

1. A client is selected from homes that have been assessed with materials and supplies on hand. If possible, select a home with multiple measures being installed to gain a wide understanding of the subgrantee's overall field practices. The client name and address are sent to grantee staff prior to the virtual monitoring visit.
2. Once the subgrantee's staff has unloaded their equipment and started work, they will contact the grantee monitor for a group video call. This occurs from the vehicle to obtain street view.
3. The grantee monitor will observe the staff working from the street view and approach the person operating the device and tour the job site. The person operating the device should be familiar with that home's scope of work to know what areas of the home to view. It will be requested that the tour is slowed with closer zooms on areas the grantee monitors need to see with more detail.
4. Each worker starting with the crew leader is asked what they are working on and how they are doing it.
5. The grantee monitor views the condition of the vehicles and tools and views safety equipment, location of Personal Protective Equipment (PPE), and Field Guides.
6. Specific areas of work in progress are compared against the grantee Field Guides and general OSHA compliance and safety practices are observed.
7. Safety violations or concerns are immediately brought up and communicated to the crew leader.
8. If it appears something is being missed, or not addressed properly, the team is given a chance to explain the reasoning.
9. The notes and video are later reviewed and compared to the technical tool for conclusion of the work in-progress monitoring.

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CLIENT FILE REVIEW:

Will be completed by having the subgrantee meet in person when the team is visiting each of the subgrantee office locations. The grantee will review all documents required including, but not limited to, the audit, the client file, and Weatherization Assistant NEAT or MHEA. All documents will be scanned and sent to the grantee staff prior to the virtual meeting. The grantee staff would review the documents before the virtual meeting just as at a site visit. The subgrantee will redact confidential client information and/or utilize a secure file transfer protocol (FTP) so confidential information can be safely shared between the local subgrantee and the grantee staff. The following steps will be followed:

Step Process:

1. Grantee staff will choose the required files to review from the list of completed DOE jobs from the current program year. They will provide the request to the local subgrantee. The local subgrantee will provide the file to CEO WAP staff when they arrive for monitoring.
2. Grantee staff will review the files and note any questions or concerns.
3. The interview is scheduled with the subgrantee involving key staff.
4. When the interview is complete, the information will be organized with any issues noted for follow-up during the virtual field visits.
5. If there are major deficiencies based on the subgrantee's answers and provided information, that will also be documented in the monitoring report.

Technical Monitoring and Training will be completed by the following CEO WAP staff:

Jacob Wolff: (0.2) Technical Monitoring / (0.8) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, and Energy Resource Center

Andy Cordova: (0.5) Technical Monitoring / (0.5) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, Energy Resource Center, and Energy Outreach Colorado Efficiency, LLC

Zac Stewart: (0.75) Technical Monitoring / (0.25) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, and Energy Resource Center

Zeb Clayton: (0.6) Technical Monitoring / (0.4) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, and Energy Resource Center

Edwin Ayala: (0.5) Technical Monitoring / (0.5) Training – Pueblo County Department of Human Services, Housing Resources of Western Colorado, Northwest Colorado Council of Governments, Arapahoe County Weatherization Division, and Energy Resource Center

An estimated 9.3% of both administrative and T&TA funds are allocated for monitoring activities.

DOE ONSITE MONITORING

Per WPN 20-4, CEO WAP will provide all requested documents to the DOE Project Officer(s) pertaining to the following areas during any DOE monitoring of CEO WAP or subgrantees:

Grantee Program Materials

1. Grantee and subgrantee most recent amended agreement
2. Completed subgrantee monitoring reports
3. Monitoring tool/instrument
4. Procedures manuals for program implementation (with technical reports)
5. Most recent grantee support contract/training entities or other contracted activities
6. Procurement documentation related to agreements

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7. Inventory tracking and records

Subgrantee Program Materials

1. Current grantee State Plan
2. Amended award with the grantee (most recent version)
3. Grantee Weatherization Policies and Procedures
4. Copies of files of homes to be reviewed and/or visited
5. Inventory tracking materials (if applicable)
6. Subcontractor Contracts
7. Procurement documents to verify competition
8. Most recent documentation of grantee monitoring visit
9. Costs and fixed price list (materials, services, audits, inspections, etc.)
10. CEO WAP shall confirm receipt of these requests and shall provide all documentation within the time period designated by the DOE Project Officer in all instances.

V.8.4 Training and Technical Assistance Approach and Activities

CEO WAP places a high priority on training and technical assistance (T&TA) to ensure the delivery of high quality, safe, cost-effective, and consistent energy efficiency and health and safety services throughout the State of Colorado. To support this goal, CEO WAP provides training programs focusing on specific training and technical assistance to all subgrantees while maintaining strong and consistent program administration of DOE funds. Comprehensive training is provided by IREC entities and are typically related to certifications i.e. Energy Auditor and Quality Control Inspector, Crew Leader and Retrofit Installer Technician. The CEO WAP Quality Management Team provides specific training as requested or required by QA visits such as computerized and field auditing, sidewall dense pack insulation, including plug patching, air leakage work, duct sealing, mobile home training, etc.

CEO WAP requires that all Subgrantees have an in-house agency trainer to help ensure that the agency training needs are being met. The agency trainer(s) is responsible for the agency training plan and to ensure all required certifications and training is being obtained.

The following sections provide a detailed outline of the comprehensive and specific technical training, as well as the administrative training that all occur under the umbrella of the CEO WAP T&TA program. CEO WAP complies with all training and technical assistance requirements outlined in WPN 22-4.

T&TA ACTIVITIES

See "PY25 Training & Technical Assistance Plan".

ADMINISTRATIVE TRAINING

CEO WAP staff conduct Administrative training as needed throughout the program year. The first annual administrative training is the Summer Meeting, held in Quarter 1, in which CEO WAP staff and subgrantees meet to discuss CEO WAP Program Guidance, regulatory issues, Federal fiscal policies, processes and changes which have been set by CEO WAP staff and subgrantees for the current program year. The final Administrative training occurs in the Quarter 3. This CEO WAP Training Meeting provides subgrantees and CEO WAP staff the opportunity to discuss changes in CEO WAP policy, understand program goals, and provide greater information as to the structure and process of the new program year. Training occurs on CEO WAP processes and procedures, reporting dates, database training, allowable and unallowable costs, and other administrative based information.

In addition to these planned training events, CEO WAP Program Manager(s) conduct subgrantee specific administrative training on topics as requested by subgrantees. Such administrative training is focused on CEO WAP policies, procedures, database, forms, fiscal practices, and other administrative elements as

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needed. In response to subgrantee trends and in common questions from all subgrantees, the CEO team convenes workgroups to provide guidance to the relevant staff; examples include a fiscal workgroup, and a Salesforce workgroup (as Salesforce is currently the database for all weatherization subgrantees).

COMPREHENSIVE TECHNICAL TRAINING

Per WPN 22-4 CEO WAP has developed and implemented a comprehensive, statewide subgrantee Technical Training Plan for PY25 that meets the requirements for comprehensive training as found in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for QCI, Crew Leaders, Retrofit Installers, and Energy Auditors.

Per DOE standards, all subgrantee Inspectors, Retrofit Installers, Crew Leaders, and Energy Auditors are required to receive comprehensive training from an Interstate Renewable Energy Council (IREC) accredited program whose curriculum is aligned with the Job Task Analysis (JTA) for that occupation as identified by NREL. In order to ease the training burden, each subgrantee may select the training delivery method (i.e. in person, via distance learning, or a hybrid approach) that best meets the needs and capabilities of each subgrantee.

In order to maintain program continuity from a production and certification standpoint, subgrantees will be required to use the following timeline for certification of all subgrantee and subcontractor employees whose primary and secondary responsibilities fall within each of the associated JTA's.

CEO maintains workforce credentials through a partnership with Everblue Training that offers in-person and online training to WAP subgrantees. CEO also utilizes training services through the Community Housing Partners (CHP) Training Center, typically by bringing CHP trainers and proctors to Colorado. Energy Auditor proctoring is also provided by Walker Energy and Code Consulting in Longmont, Colorado.

For the upcoming program year 2025, CEO will cover the cost of tuition for field and administrative staff that wish to take the online courses offered by Everblue Training included in the contracted agreement with the CEO. The courses offered by Everblue Training qualify for Continuing Education Units (CEU) from BPI, and can therefore be applied to the required CEUs needed for recertification of existing credentials.

SUBGRANTEE EMPLOYEES

QUALITY CONTROL INSPECTORS:

CEO WAP subgrantees are required to have all individuals that are either full time or part time Inspectors complete comprehensive training and be certified as a Building Performance Institute (BPI) Quality Control Inspector (QCI). Inspectors that are hired must receive their QCI certification prior to conducting any final inspections for a subgrantee. In order to maintain program transparency, subgrantees are required to identify all QCI on staff, as well as the date that each QCI certification expires, on the subgrantee Training Plan that is submitted annually to CEO WAP. Subgrantees will be responsible for ensuring certifications of all QCI certification are maintained and current at all times and are responsible for recertification in all instances. In addition to QCI certifications, all inspectors must receive an OSHA 30 and Lead Safe Renovator certifications. Additionally, a minimum of one subgrantee employee, not necessarily an inspector, must have a Colorado Department of Public Health and Environment Certified Asbestos Building Inspector on staff. Subgrantee QCI are required to receive comprehensive training when they are renewing existing certifications. Certifications will be renewed and updated prior to expiration.

RETROFIT INSTALLERS, CREW LEADERS, AND ENERGY AUDITORS:

Subgrantee employees whose primary and secondary duties fall under the JTA's for Retrofit Installers, Crew Leaders, and Energy Auditors are required to undergo comprehensive training and certification after the employees' existing BPI certifications have expired.

In order to maintain program transparency, subgrantees are required to identify all Retrofit Installers, Crew Leaders, and Energy Auditors that are on staff, as well as the date that each certification expires on the Training Plan that is submitted annually to CEO WAP. Subgrantees will be responsible for ensuring certifications of all Retrofit Installers, Crew Leaders, and Energy Auditors are maintained and current at all times and are responsible for recertification in all instances. OSHA 30 or CPR/ First Aid certification is required for Crew Leaders. Additionally, a minimum of one subgrantee employee, must have a Colorado Department of Public Health and Environment Certified Asbestos Building Inspector on staff.

SUBCONTRACTORS

QUALITY CONTROL INSPECTORS:

Subgrantees are allowed to hire subcontractors to perform final inspections of DOE funded units provided that the inspector is QCI certified. Subgrantees are required to verify that all subcontractors hired to conduct a final inspection are QCI certified at all times, and that the QCI has not had any prior contact with the unit per the independent QCI model that has been adapted for the program.

SUBCONTRACTOR RETROFIT INSTALLERS, CREW LEADER, AND ENERGY AUDITOR

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Subcontractors hired by subgrantees are not required to have Retrofit Installers, Crew Leader, and Energy Auditor (EA) certifications, however all work performed by subcontractors must meet the standards and practices found in the SWS and CEO WAP Policies and Program Guidance. Subgrantees are responsible for distributing applicable SWS guidelines to all subcontractors and are also responsible for ensuring all work performed by subcontractors meets the standards as found in the SWS at all times. Work performed that does not have an associated SWS standard, must comply with all DOE SWS & Field Guide standards, if applicable. Work performed by subcontractors that do not have an associated SWS or DOE SWS, must be compliant with CEO WAP Policies.

Agency Trainers may invite subcontractors to participate in local field training or provide on-the-job training to subcontractors on the job-site. Subcontractors are encouraged to enroll in subgrantee training courses, such as the BPI certification courses or field internships. T&TA funds may be used to train contractors, provided that the subcontractor is participating in the program during the program year. In making the determination for contractor participation in training with grant funds, subgrantees must secure a retention agreement in exchange for the training. The contract agreement must stipulate that contractors will work in the program, at a minimum, for a specific amount of time that aligns with the cost of the T&TA provided. Subgrantees must obtain approval to enter into such agreements by CEO prior to engaging with the contractor. After the approval process, proof of agreement in the form of a contract must be provided to CEO before contractors can receive scholarship compensation. CEO will only compensate for tuition costs. Travel, per diem, and other ancillary costs associated with training will not be approved.

SPECIFIC TECHNICAL TRAINING

Specific Trainings consist of single issue, short term, training designed to address acute deficiencies in the field or in day to day program management, or based on Quality Assurance Inspection deficiencies. The primary objective of Specific training is to review the work flow process, identify inefficiencies, and to discuss ways to improve the overall processes of subgrantees. Specific training is conducted by CEO WAP Quality Management Team and other approved training entities. All subgrantees will receive Specific Training during PY25. Specific Training consists of training in all elements of CEO WAP, and SWS Policies, including, but not limited to: combustion appliance testing, pressure diagnostics, NEAT/MHEA, work order development, SWS, ASHRAE 62.2.2016, manufactured homes, measures installation, and other trainings as requested. Training typically includes classroom training and hands-on training out in the field. In addition, a general review of the training objectives and an overview of the Weatherization Program from a national and state perspective will be conducted at each subgrantee training. Additionally, general work processes including job set up, safety, and good or best practices will be covered in the initial training review and throughout the training process.

Other, more specific training needs are assessed by CEO WAP Quality Management Team via four methods, they are:

1. Site Visits provide an opportunity for the CEO WAP Quality Management Team to assess subgrantee work quality and compliance with the SWS and CEO WAP Policies and Procedures. Site visits consist of evaluating completed and in-progress work for adherence to the SWS standards, review of client files to ensure adherence to CEO WAP policies, and to identify subgrantee specific issues that require additional training. Onsite visits help the CEO WAP Quality Management Team to identify specific subgrantee training needs as well as best practices that one subgrantee may have developed that could be used by other subgrantees. All site visits performed by the CEO WAP Quality Management Team have an associated Quality Assurance (QA) Report for that visit that provides detailed analysis of the work performed by the subgrantee on completed DOE units. Once the QA Report for a subgrantee has been completed, the CEO WAP Quality Management Team meets to discuss the subgrantee's overall performance, outstanding issues and concerns to be aware of during future visits. During these meetings, subgrantee specific training needs are identified and discussed. If subgrantee specific training is deemed necessary, the technical team will create a training plan that will address these deficiencies. If corrective action item deficiencies are identified during the visit, specific action items are discussed and responses are required by the subgrantee. These reports, including their corrective action item deficiencies, are stored on the CEO WAP database and reviewed before the subgrantee's next QA visit to ensure the problem has been resolved and the subgrantee complies moving forward.
2. All information relating to installed measures are collected through the CEO WAP database, and can be sorted, compared and evaluated in real time. This data provides insights regarding costs per unit, costs related to field functions or office functions, types of energy efficiency and health/safety measures being performed and their relative frequencies, and beginning and ending air leakage rates. Each month, reports including subgrantee specific production analysis (including all installed measures and their costs) and fiscal analysis (including budget to actual reports) are completed and posted on the CEO WAP database. CEO WAP monitors this data to determine if agencies are under performing or lacking proficiency in any one particular area. Outliers are determined and necessary Specific training activities are developed by the technical team. This data, along with the site visit information, provides a starting point for empirical and qualitative assessment of the effectiveness of the work being performed.
3. External QA reports that are reviewed include, but are not limited to: DOE Project Officer monitoring reports, internal state audits, and IG reports. CEO WAP examines ALL quality assurance monitoring reports to identify recurring quality deficiencies within specific measures and/or processes.
4. CEO WAP maintains copies of all standards and policies, including the SWS, CEO WAP Policies and Procedures, and all other technical requirements on the CEO WAP database, to which all subgrantees have access to. Upon updating the rules, regulations, or standards of any documents, CEO WAP emails a copy of the changed requirements to the Program Director of each subgrantee and requests that each Director send back an email stating that they have received the updated requirements. In addition, CEO WAP staff update the control copy on CEO WAP database with the updated

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information so that all subgrantees have access to the most recent standards.

CLIENT EDUCATION

Per CEO WAP Policies and Procedures all clients are provided with education about the materials being used in their homes. Educational pamphlets are discussed and provided to the clients about materials already present in the home that may be detrimental to the health of the client, such as asbestos, lead, and radon. Upon receipt of these documents all clients are required to sign and date that they have been notified of the potential dangers of having these substances in their home. Materials created and provided to clients for educational purposes also include, but are not limited to, no cost ways to save energy, insulation, appliances in the home, etc. All grantee and subgrantee staff assist in client education on an as-needed basis.

It is the responsibility of the Energy Auditor and crew lead, to review the measures to be completed in the home before work commences, as well as educate clients about the potentials for energy savings and operating any appliances which may be added or replaced.

CEO WAP QUALITY MANAGEMENT TEAM

TRAINING:

CEO WAP Quality Management Team maintains the highest levels of training in DOE and industry standards in order to ensure quality and consistency in reviewing subgrantee work. CEO WAP Quality Management Team are required to have a current QCI certification, if doing QA inspections, and may have other certifications such as Asbestos Building Inspector (ABI), and Renovation, Repair, and Painting (RRP) certification, and an OSHA 30 certification that assist in their ability to perform QA inspections of subgrantee work.

PERCENT OF OVERALL TRAININGS

Comprehensive Trainings: 40%

Specific Trainings: 60%

BREAKDOWN OF T&TA TRAINING BUDGET

Percent of budget allocated to Auditor/QCI trainings: 30%

Percent of budget allocated to Crew/Installer trainings: 50%

Percent of budget allocated to Management/Financial trainings: 20%

Percent of overall trainings

Comprehensive Trainings:	40.0
Specific Trainings:	60.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	30.0
Percent of budget allocated to Crew/Installer trainings:	50.0
Percent of budget allocated to Management/Financial trainings:	20.0

V.9 Energy Crisis and Disaster Plan

The purpose of the CEO WAP Disaster Relief Plan is to provide weatherization emergency services to qualified individuals and families affected by a disaster as determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency. The disaster generally involves the following phases: the crisis itself, cleanup, and repair or rebuilding of the area. It is not uncommon for weatherization work to be suspended during the crisis and early cleanup period until such time as community services including electricity, water, and other infrastructure can be restored. The plan will be in effect dependent upon the anticipated recovery period.

Disaster relief services are only available to qualified residential households directly affected by the declared disaster. Local agencies are required to identify and provide weatherization assistance to elderly persons, persons with disabilities, families with children five and under. However, in the case of a declared disaster,

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households located in the disaster area can take top priority as long as the households are income eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster. Local authorities must deem the dwelling unit salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation. For qualified households, the unit allowance will be a maximum of \$8,547 as permitted by DOE WPN 25-1.

The use of DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster or force majeure are not allowable. Allowable expenditures under WAP include:

1. The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective and
2. The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials. To the extent that services are in support of eligible weatherization (or permissible re-weatherization) work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.
3. Guidance under WPN 22-7 will determine the allowability of installed Health and Safety Measures for affected homes in the disaster area.
4. Applications will be taken to determine and verify eligibility for potential
5. WAP qualified individuals affected by the disaster. Reporting will be the same as normal requirements with notes indicating in the comment section the unit was weatherized as a result of the disaster. All measures must be cost justified using the DOE approved energy audits, i.e. NEAT/MHEA with a SIR of 1.0 or greater. Incidental repairs can be made to preserve or protect a measure and should be cost justified within the measure(s) identified in the assessment per DOE guidance WPN 19-5. Any unusual circumstances will require the pre-approval of CEO WAP staff and possibly pre-approval of DOE.
6. Any qualified home damaged by disaster such as flooding can be re-weatherized without regard to the date of weatherization, if the damage to materials is not covered by insurance.
7. All remaining measures are to be installed in order of priority in accordance with CEO WAP Policies and Procedures for managing the Weatherization Assistance Program.
8. Local agencies may use Weatherization vehicles and/or equipment to help assist in disaster relief provided WAP is reimbursed according to 2 CFR 200 rules. Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local subgrantee weatherization files, records and the like during the initial phase of the disaster response.