

# **National Association for State and Community Services Programs (NASCSPP)**

## **Infrastructure Investment and Jobs Act (IIJA) Working Group:**



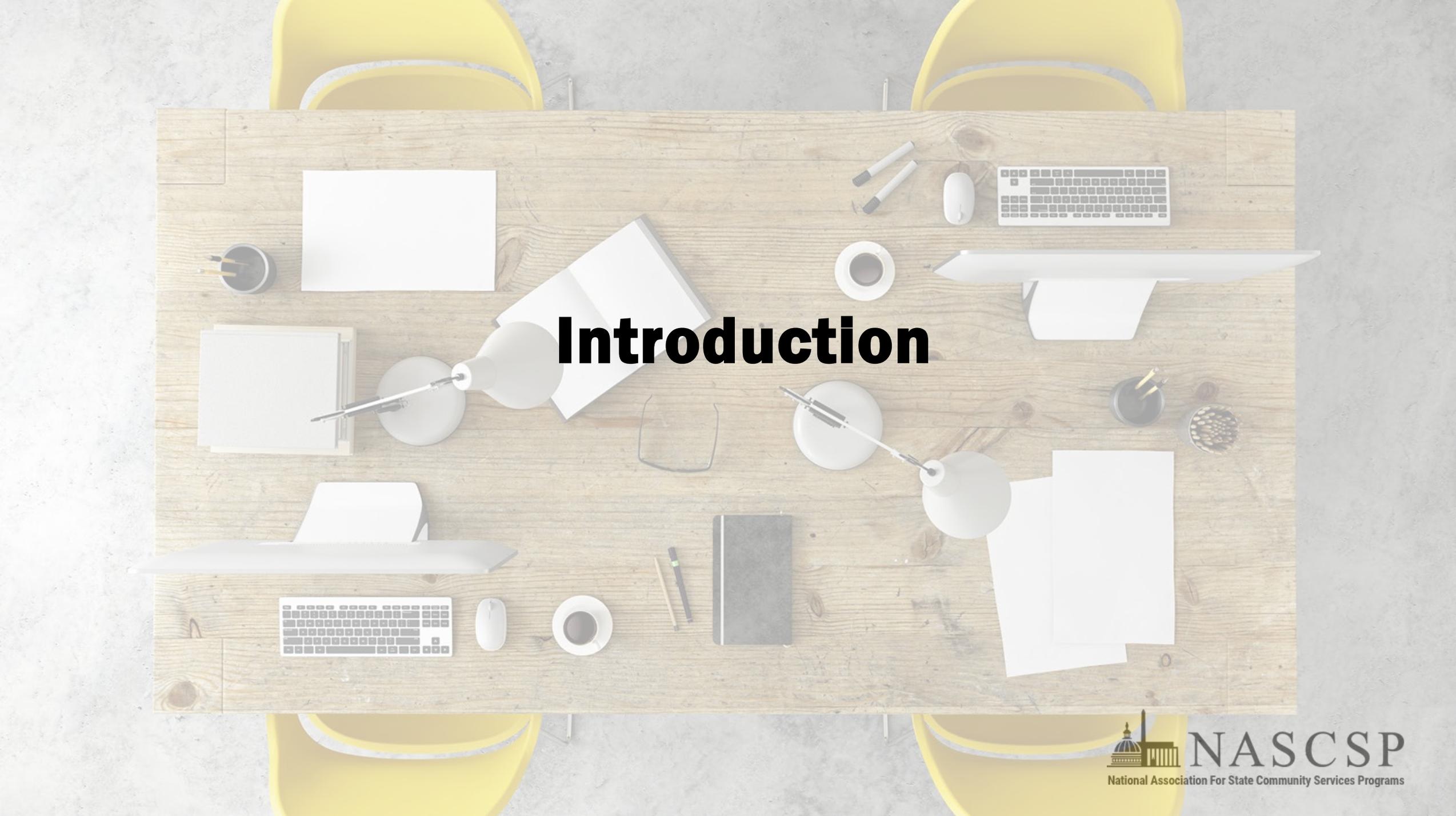
### **Recommendations for the IIJA State Plan Modification**



# Agenda

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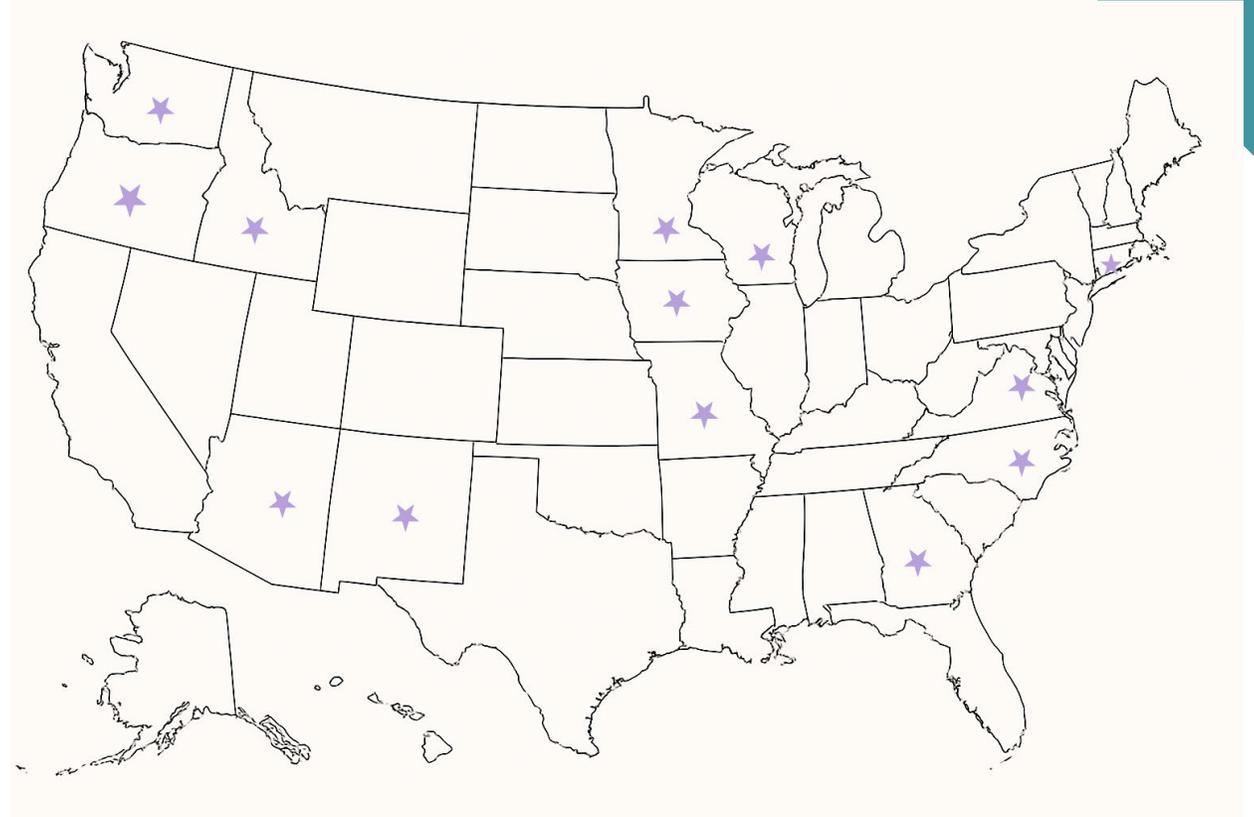
- Introduction
- IJA Implementation Working Group Members
- IJA State Plan Modification Milestones
- Starting the Process
- Budget
- Annual File
- Master File
- Final tips & takeaways



# Introduction

# IIJA Implementation Working Group Members

Travis Ekenberg	Arizona
Jenifer Bissett	Virginia
Laura Whitfield	Georgia
Scotty Reed	Washington
Andrew Etue	Washington
Dimitri Florez	New Mexico
Christine Taylor	Iowa
Daniel Huber	New York
Clint Bowers	Idaho
Sandy Buescher	Missouri
Kathy Jeffries	Missouri
Stacy Humbert	Wisconsin
Clara Castellejos	Minnesota
David Trembath	New Mexico
Queenie Karlik	Washington
Pablo Torres	North Carolina
Olivia Colon	Connecticut



# Reaching the Milestones

## Milestone 1

- 30% of all IJA units are weatherized based on the Grantee's approved IJA State Plan

## Milestone 2

- Grantee demonstrates that it has fulfilled monitoring and inspection protocol as part of the approved IJA State Plan.

## Milestone 3

- Grantee monitors each local agency at least once each year to determine compliance with administrative, fiscal, and Grantee field policies and guidelines.

## Milestone 4

- Local quality control efforts are in place

## Milestone 5

- At least 5% of the completed IJA units are inspected by the Grantee's certified Quality Control Inspector (QCI) staff during the year

## Milestone 6

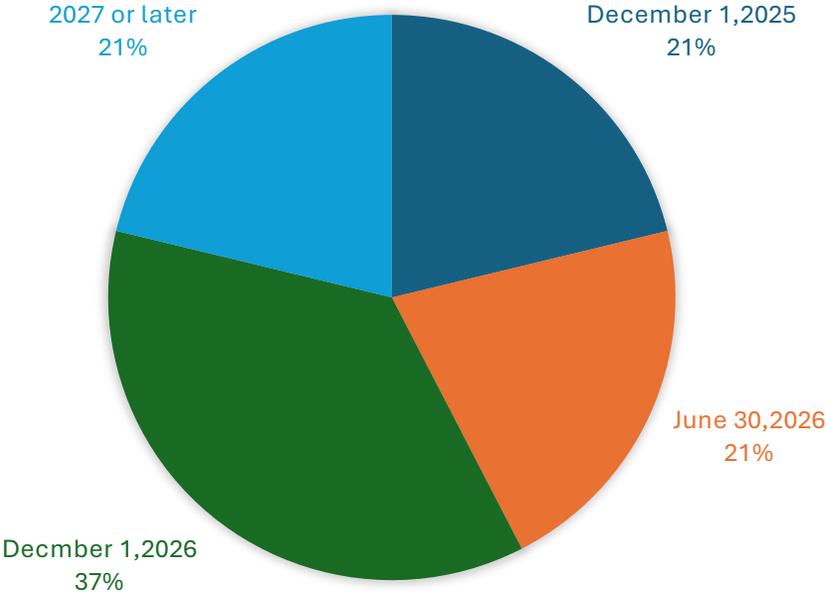
- Grantee's quarterly progress and annual reports are current, accurate and approved by Project Officer in accordance with grant requirements

## Milestone 7

- Monitoring reviews by DOE confirm acceptable performance

# Grantee Polling Data

WHEN DO YOU EXPECT TO MEET ALL MILESTONES FOR THE IJJA FUNDS TO REQUEST RELEASE OF THE REMAINING 50% OR FUNDING?



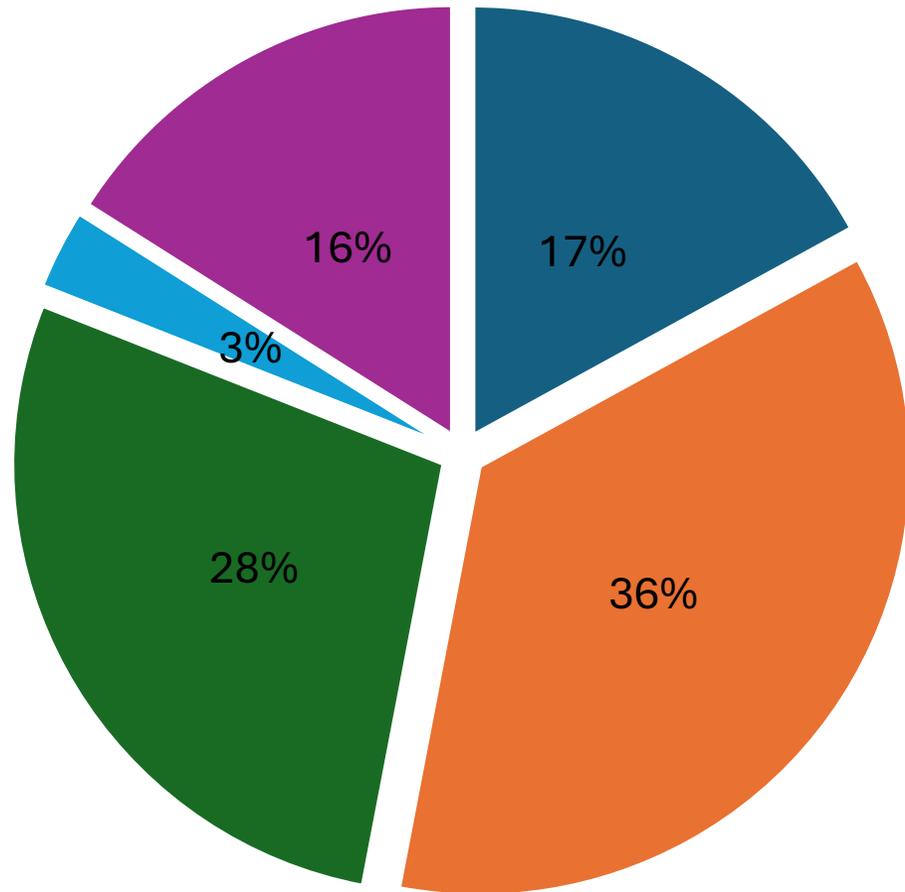
During the Third Quarterly Member Webinar held on 9/11/25, a live poll was conducted asking when grantees hoped to reach the seven milestones

# Where is your state currently in the IJA State Plan Modification process?



- Not yet started
- Drafting internally
- Submitted to DOE, under review
- Approved / implementing
- Modifications already completed

What is your current IJA production percentage?



■ 0-10% ■ 11-20% ■ 21-30% ■ 31-40% ■ Above 40%

\*Poll taken 9/11/25

## Polling Data

A second poll question was conducted, and the results showed that over 80% of the Current IJA Production is divided among the lowest three allocation ranges, which account for less than 30% of production.

# What is currently the biggest constraint to increasing IJA production in your state?



- Subgrantee Contractor capacity
- Subgrantee Staffing / admin capacity
- Procurement or RFP delays
- Budget structure / ACPU limitations
- Data or reporting systems
- Other

# Starting the Process

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All DOE Milestones met per [WAP Memo 131](#) Revised

Review DOE guidance for any updates or modifications

Meet with internal staff to identify any necessary changes. i.e., subgrantee updates

Meet with subgrantees to get feedback on what could be improved and what is working well.

# Starting the Process



Reach out to your DOE Project Officer before starting modification in PAGE to ensure proper timing



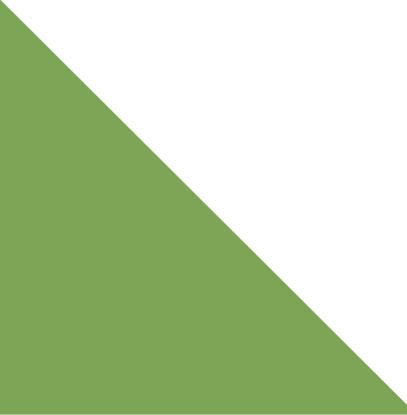
Begin modification, remember to align such items as staff time charged to IJA award vs Formula award



Submit modification and reach out to your DOE Project Officer to notify of changes



Once approved, update any agreements with subgrantees if needed



# **IIJA State Plan Modification – Budget Section**

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# SF-424A Budget Summary

- Add each funding source that will be utilized during the life of the grant to the SF-424A
- The inclusion of any leveraged funds to be used in combination with DOE funds, and will follow all DOE rules, regulations and guidelines
- **Note:** Leveraged funds that run parallel or outside the DOE award (not included in the DOE budget) have greater flexibility.

# Budget Categories



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## Mandatory Budget Categories:

- Grantee Administration
- Subgrantee Administration
- Grantee T&TA
- Subgrantee T&TA
- Program Operations

# Budget Categories – Terms & Conditions:

## Term 34. Budget Categories

### Transfer of Funds Among Direct Cost Categories

- You need approval when you change the total project cost or what the project does.
- You can move money between direct cost categories freely—even over 10%—as long as you notify DOE.
- There are still limits (for example, Admin and T&TA caps still apply, and equipment still requires prior approval under WAP rules).
- You always need approval to shift money between direct and indirect categories.
- If your indirect costs are lower than expected, you can use the leftover indirect dollars for direct costs (up to 10%).

# Budget Categories

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## Optional Budget Categories:

- Vehicles and Equipment
- Liability Insurance
- Leveraging
- Health & Safety
- Financial Audit
- Energy Crisis
- Disaster Crisis
- Special Projects I-V
- Intake Eligibility
- Final Inspection
- Energy Audit

# **\*NEW\* Optional Budget Categories**

We recommend using all the Optional Budget Categories to capture costs for specific activities that DOE considers outside the expenditures calculated in the “average cost per dwelling unit (ACPU)”. The benefit of including these categories is the additional spending flexibility, without impacting the ACPU. See [WPN 24-7](#)

- Intake/Eligibility
- Final Inspection
- Energy Audit

# Optional Budget Categories

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## Vehicles and Equipment:

- Recommendation: We recommend proactively utilizing available IIJA funding to execute a systematic replacement of older vehicles within the network fleet.
- Financial Benefit (Amortization): Strategic replacement allows the agency to capitalize on the benefits of vehicle life amortization, distributing the capital cost over the asset's useful life and improving long-term budget predictability and efficiency.
- See State example [here](#)

## Liability Insurance and Financial Audits:

- Review the subgrantee's general ledger or budget to determine an appropriate average cost.

# Optional Budget Categories

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## Health & Safety (H&S) budget category

- Remember, there is no statutory limit on the amount of funds you can include in this budget category, but there is a justification required for requests beyond 15%.
- Note: The justification can include the need for additional funds, as other braided funds may not be available, such as the Low-Income Home Energy Assistance Program (LIHEAP).
- Recommendation: Analyze costs and consider increasing the health and safety percentage to provide sufficient funds to address health and safety issues. **Many states are currently at 20-30%.** See state plan analysis [here](#)

# Which optional budget categories has your state already included in its IIJA plan?



- Intake / Eligibility
- Energy Audit
- Final Inspection
- Vehicles / Equipment
- Leveraging
- None yet

# Leveraging Category – State Plan Examples

## Leveraging:

- Grantees can allocate up to 15% of the IJA allocation for leveraging activities
- Recommendation: allocate .05-1.5% of the budget towards leveraging. Activities could include paying for or hiring consultants to explore and develop partnerships with utilities or other entities to generate non-Federal resources for WAP.

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) FINANCIAL AUDITS	(2) LEVERAGING	(3)	(4)	
a. Personnel	\$ 0.00	\$ 0.00			\$ 7,655,349.00
b. Fringe Benefits	\$ 0.00	\$ 0.00			\$ 5,835,031.00
c. Travel	\$ 0.00	\$ 0.00			\$ 10,448,550.64
d. Equipment	\$ 0.00	\$ 0.00			\$ 40,000.00
e. Supplies	\$ 0.00	\$ 0.00			\$ 596,529.00
f. Contract	\$ 131,250.00	\$ 80,000.00			\$ 156,359,885.00
g. Construction	\$ 0.00	\$ 0.00			\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00			\$ 1,912,725.00
i. Total Direct Charges	\$ 131,250.00	\$ 80,000.00			\$ 182,848,069.64
j. Indirect Costs	\$ 0.00	\$ 0.00			\$ 336,835.36
k. Totals	\$ 131,250.00	\$ 80,000.00			\$ 183,184,905.00
7. Program Income	\$ 0.00	\$ 0.00			\$ 0.00

# Budget Justification

This section details how the project's costs within the budget categories align with the planned activities and provides a justification for those costs.

- Personnel

Ensure that employees budgeted for both WAP formula and IIJA do not exceed 100% in both grants.

- Travel

Include all in-state (Policy Advisory Council meetings, both administrative and technical monitoring) and out-of-state travel. DOE may not issue Conference training support memos. Grantees should include NASCSP Winter Training and Annual Training Conferences and other WAP conference training in the IIJA Budget detail.

# Budget Justification

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## Contracts and Subgrants

- Recommendation: Consider adding a Contractor Stipend and Workforce Pipeline for Students in the Weatherization Program. See T&TA Section.
- See [MI State plan](#) language

The Weatherization workforce development and performance improvement planning includes two programs one is the contractor stipend plan and the workforce pipeline for students to work in the Weatherization Program that is outlined in the Training and Technical Assistance Plan. The contractor stipend is based on the number of retrofit installers, energy auditors, and quality control inspectors that are currently working in the Weatherization Program as well as the number of classes to be offered this year. The workforce pipeline is based on another state's model and will begin with training and paying stipends for a retrofit installer pilot cohort before expanding. (\$100,000 T&TA) expenditures

# Budget Justification Examples

## 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.

<u>Purpose of Trip</u>	<u>Number of Trips</u>	<u>Cost Per Trip</u>	<u>Total</u>
Technical Monitor and Lead Program Manager to attend conferences such as National Home Performance and Trade Show	4	\$2,405.00	\$9,620.00
Senior program manager and program monitor; attend NASCSP or similar type conferences.	4	\$2,405.00	\$9,620.00
Program monitor to perform required QCI on 10% of completed units.	14	\$679.00	\$9,506.00
Program Managers, Lead Program Manager, Energy Director to attend Weatherization Conferences such as NASEO, NCAP, NASCSP etc.	8	\$2,405.00	\$19,240.00
Program manager to perform program monitoring visit on each subgrantee at \$679 per visit.	14	\$679.00	\$9,506.00
to even out page budget	1	\$1.00	\$1.00
		Travel Total	\$57,493.00



# IIJA State Plan Modification – Annual File Section

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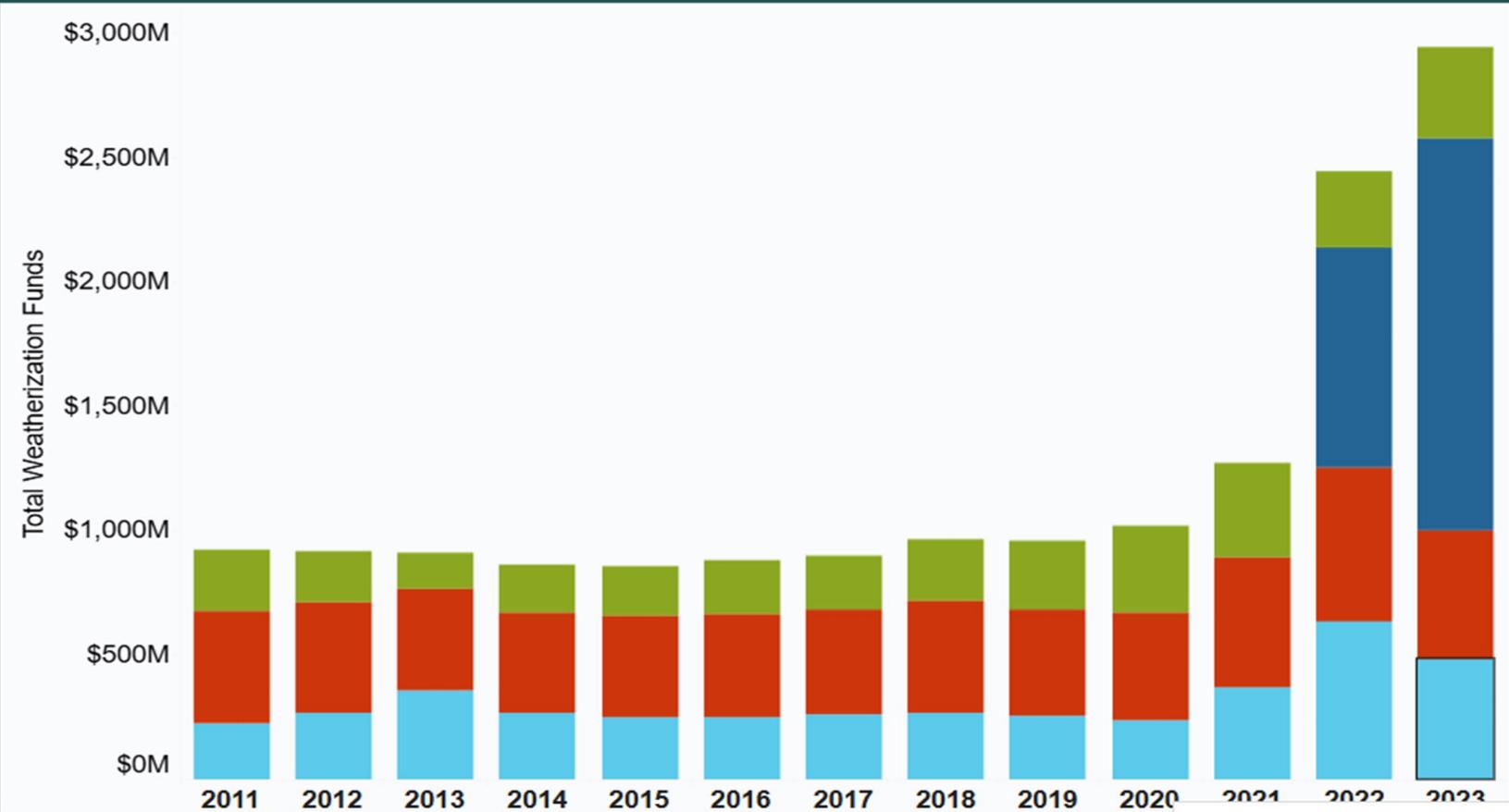
# Overview of WAP funds

This [chart](#) shows the increase of weatherization funding over the past 10+ years. In 2023 there were \$486M of “Other” leveraged funds used with the WAP.

## Weatherization Funding 2011-2023



### Weatherization Funding by Source Over Time



- Source**
- DOE
  - IIJA
  - LIHEAP
  - Other

Funding Source: **Other**  
Year: **2023**  
Amount of Funding: **\$486M**

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

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This section explains the use of leveraged funds across the budget categories and implementation.

A best practice is to generate at least one non-federal leveraging dollar for every DOE dollar expended.



# IV.4 DOE-Funded Leveraging Activities– State Plan Examples

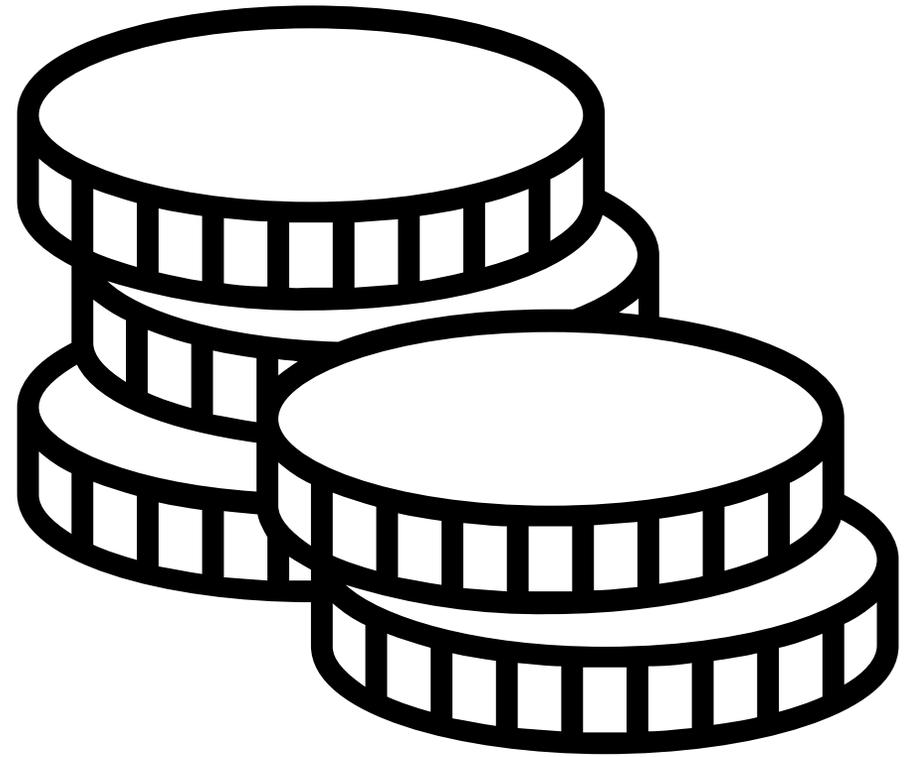
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## Michigan

State will run an RFP for a leveraging contractor who will elevate the priority of supplemental Weatherization funding in the WAP.

State has struggled with disproportionately low amounts of both LIHEAP and non-LIHEAP supplemental funding in our state program which limits program flexibilities.

This contractor will work to prioritize increasing LIHEAP, general fund and utility dollars consistently in the State WAP. Work will be done across state departments and in conjunction with other stakeholders.



# IV.4 DOE-Funded Leveraging Activities– State Plan Examples

## Minnesota

- Increased partnerships with program stakeholders by creating a joint “leveraging plan”.
  - Service Provider Education, Planning, and Training on Leveraging Activities
  - Partnership Development to Support Equitable Services
  - Supporting Implementation of Innovative Approaches for New Relationships and Funding Opportunities

## Wisconsin

- Leveraged funds provide staff oversight for the operation of the joint DOE/Public Benefits weatherization assistance program. Leveraged funds are used to continue program design work, assist subgrantees in training new personnel, work with property owner associations to increase the number of weatherized rental units, and coordinate utility providers’ contributions to the state Public Benefits funds.

# How would you describe your state's current leveraging strategy under IIJA?



- Well-established and documented
- In Development
- Gathering ideas from other states
- Minimal
- None

# IV.6 State Plan Hearings

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A minimum of 10 calendar days' notice is required.

Virtual public hearings are allowed as long as the provisions are within [10 CFR § 440.14](#).

**Recommendation:** Before the public hearing, write down a script/talking points to read during the meeting and provide to the transcriber. Also consider conducting the meeting in a hybrid approach, both virtually and in-person. Lastly, request that those providing testimony bring their comments in a written form or provide them after the meeting for ease of transcription.



# IV.7 Miscellaneous

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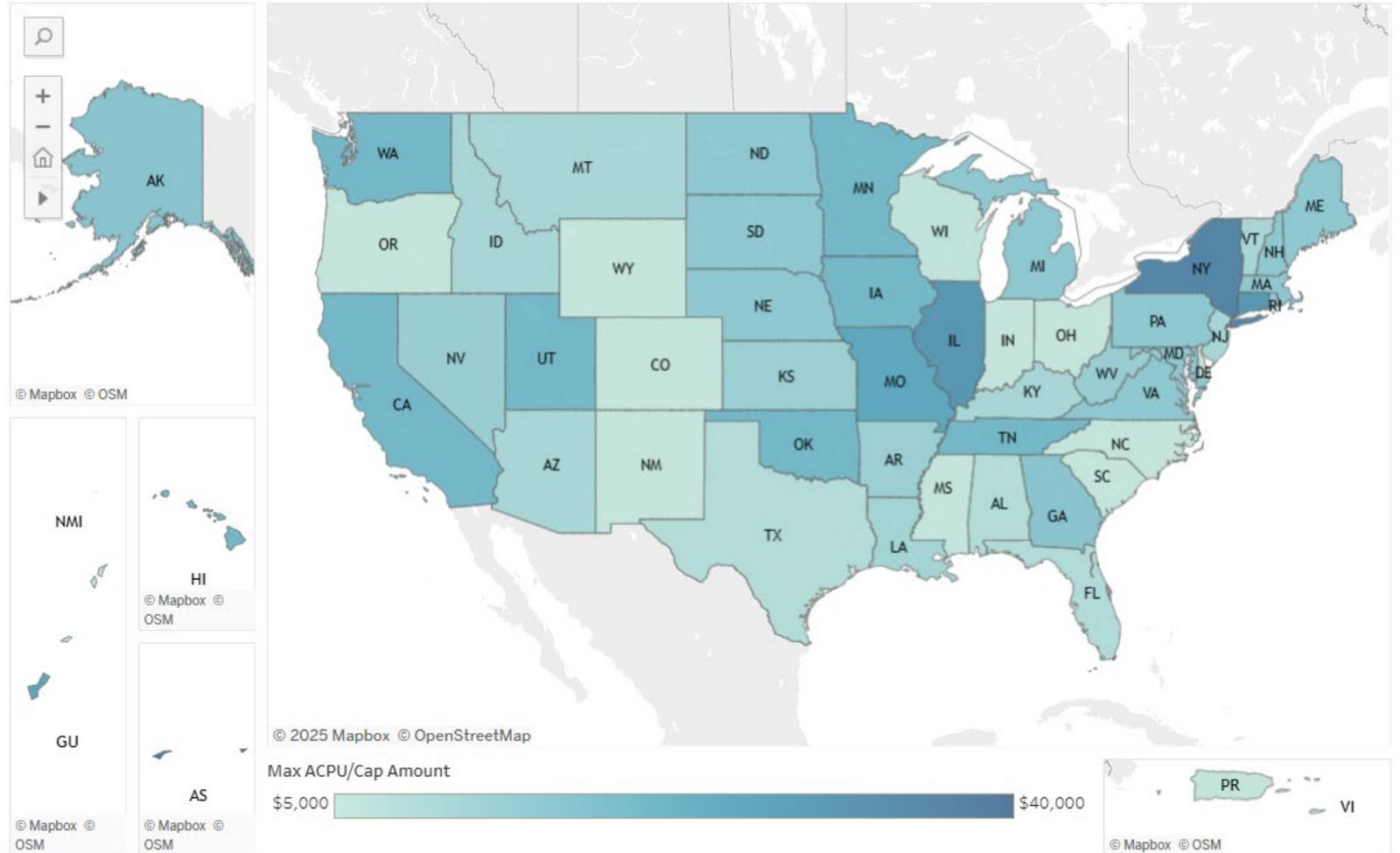
Make sure to include a summary of all changes made to your state plan during the modification process, the SF-424, Annual File, Budget, or Master File, and resubmit the application for review.

- Provide a summary of changes to your DOE Project Officer to expedite the review process.
- Ensure to include [Davis Bacon](#) and Buy American Compliance
- NASCSP recommends including the braiding of Weatherization Readiness Funds (WRF). This process is further detailed in the [WX Readiness Toolkit](#).
- NASCSP recommends that [Fuel Switching](#) be reviewed on a case-by-case basis to determine its cost-effectiveness in each specific circumstance.

## PY 2024 Weatherization Readiness Funds (WRF) ACPU / Maximum Expenditure Per Unit

The [PY 2024 State Plan Analysis](#) revealed that the median WRF ACPU/ Maximum Expenditure per Unit in 2024 was \$15,000

**Recommendation:** Set an ACPU vs. a hard cap, use the national average of \$15,000, or no limit, as some states have.

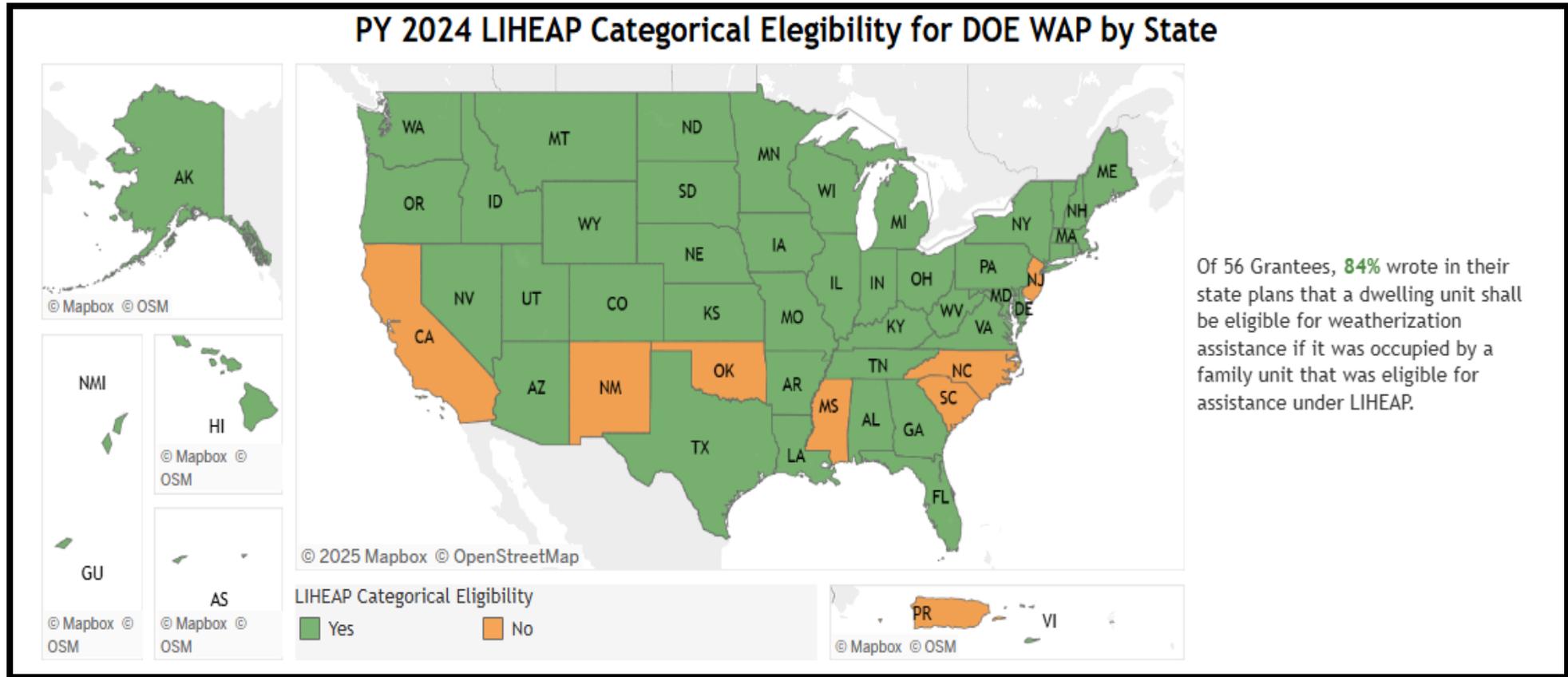


# Miscellaneous

# IIJA State Plan Modification – Master File Section

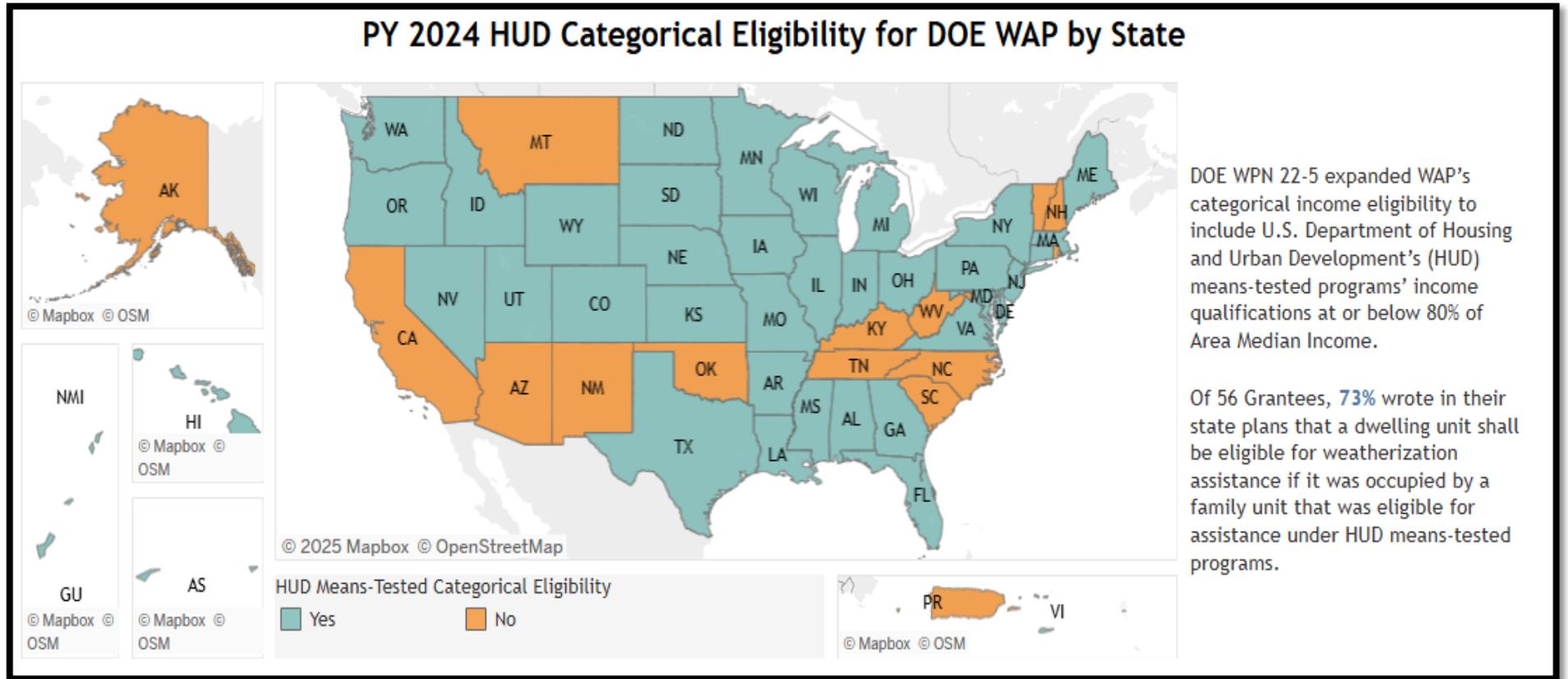
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Recommendation:  
Include categorical  
eligibility for  
LIHEAP



# V.1.1 Approach to Determining Client Eligibility

Recommendation:  
Include categorical  
eligibility for **HUD**  
means-tested and  
**USDA** means-tested  
programs.



# V.1.1 Approach to Determining Client Eligibility

# Which forms of categorical eligibility does your state currently use?



- LIHEAP
- HUD means-tested programs
- USDA means-tested programs
- None
- Unsure

# V.1.1 Approach to Determining Client Eligibility

- Language Recommendation MI State Plan: Income definition description: A dwelling unit is eligible for weatherization under DOE funding if it is occupied by a low-income household:
  - Traditional Eligibility: Whose income is at or below 200% of the most recent Federal Poverty Income Guidelines and is eligible under LIHEAP funding for assistance when income is at or below 200% of Federal Poverty Income Guidelines as allowed by 10 CFR 440.22.
  - Categorical Eligibility: Which contains a member who has received cash assistance payments during the preceding twelvemonth period under Titles IV and XVI of the Social Security Act, Pub. L. No. 88452, 42 U.S.C. § 2701 et seq. or applicable State or local law.
  - Categorical Eligibility: Who is determined eligible for assistance under the **Low-income Home Energy Assistance Act** of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.
  - Categorical Eligibility: Whose residents have met the income requirements of **HUD and USDA means-tested** programs.

# V.1.2 Approach to Determining Building Eligibility

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- For multifamily units, consider specifically the U.S. Department of Agriculture and Low-Income Housing Tax Credit (LIHTC) Properties for eligible units.
- Consider enhancing the [data management](#) system to include a notification for re-weatherization dates automatically. Also include direct links to lists of predetermined eligible properties.
- **Recommendation:** Consider adding Multifamily rental building eligibility to this section. Ensure to address tenant/landlord agreements as outlined in examples from states such as [KY](#) and [OH](#).

# V.1.2 Approach to Determining Building Eligibility

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- Recommendation: Consult the U.S. Department of Agriculture (USDA) Programs list for eligible buildings and the HUD property list identified in WPN 22-5
- Consider having owners of rental buildings participate in the financing of weatherization activities.
- **New York Example:** In accordance with Federal rules and guidance intended to limit undue or excessive enhancement of the value of multifamily rental units resulting from investment of Program funds, HCR requires most owners of multifamily rental property to contribute to the cost of the weatherization work scope as a condition of receiving assistance. Generally, multifamily building owners must provide 25% of the total cost of the work to be done to meet Program standards; unless the building is occupied by the owner as his or her primary residence and the owner qualifies for WAP assistance as a low-income household. *\*\*Concessions, reduction or waivers may be granted at State discretion.*



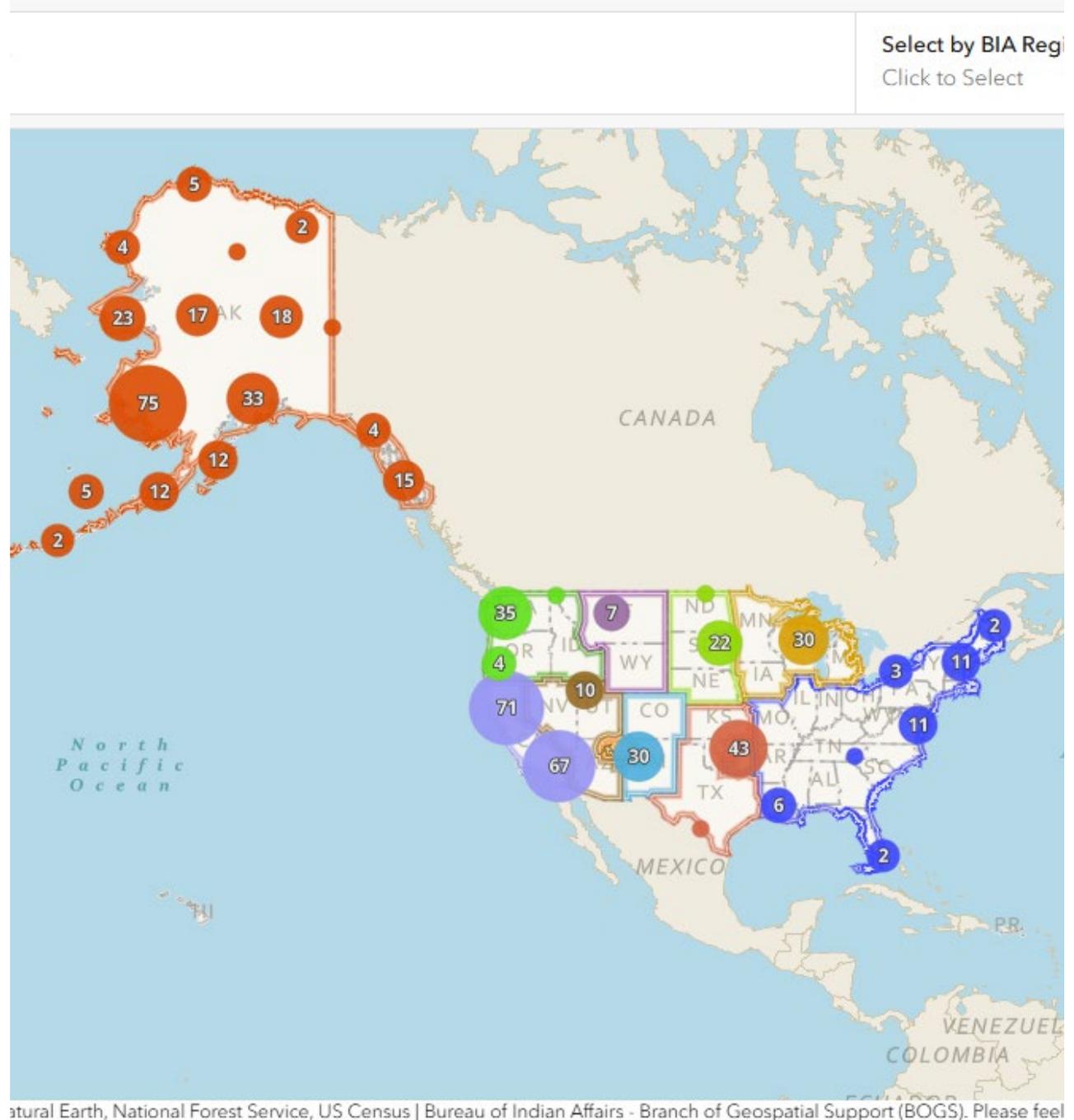
## **V.1.3 Definition of Children**

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Recommendation: Adopt the maximum age threshold of 19 to ensure the broadest possible eligibility for weatherization

# V.1.4 Approach to Tribal Organizations

The [Tribal Leader Directory](#) can be a valuable resource for finding recognized tribes in your area to build relationships with tribal communities.



# V.2 Selection of Areas to be Served

Develop a clear succession plan that includes an emergency service provider to cover a service area while a new provider is being secured through the bidding process.

Recommendation: Consider adding example language for when you redistribute counties served to EXISTING subgrantees without a public hearing.

Redistribution provision GA State Plan example:

**Redistribution Provision:** State retains the right to allow for reallocation of funds to subgrantees and across budget categories using the same formula as originally proposed or any other funding plan that meets the needs of targeted citizens. State retains the right to reassign subgrantee territories to other existing subgrantees operating a WAP program to ensure continuous service coverage to all 159 counties. ***This can be done without holding additional public hearings.*** Active management and reallocation of the grant allows the grant to be fully expended during the budget period. Details about termination and corrective action plans for subgrantees are described in the monitoring section of the Master File

# V.2 Selection of Areas to be Served

When an under-performing grantee is identified, a reallocation of funds may occur. Identification can be made through a risk assessment or by reviewing monthly spend and production calculations.

## KY State Plan:

When determining to which subgrantees' funds will be reallocated, Grantee may consider such factors as work qualifications, remaining funds available to expend, proximity and ability to serve the additional area, as well as federal grant compliance history. Reallocation of funds may be awarded through an open application. In situations where no CAA is available or eligible, other nonprofits or local governments in the state will be eligible to receive the reallocations.

## MI State Plan:

State reserves the right to reallocate funding from one subgrantee to another, should any of the current subgrantees be unable, for whatever reason, to fulfill their obligations to implement the program in their service area. The term implement includes maintaining production level goals and meeting work quality standards (SWS and State Field Guide). Additionally, in an event that an area is unserved, the State reserves the right to designate a provider for the service area until another Invitation to Bid is posted.

# V.3 Priorities

**Recommendation:** Streamline service delivery when large areas are covered by subgrantees

[MI State Plan Example:](#)

When the Subgrantee's territory covers a large geographical area, it is also permissible to prioritize service based on cost effective scheduling considerations. For example, if a prioritized client lives in a county distant from the main offices, other homes in that area on the waitlist may be served during the same time period if it eliminates costs and travel time to the agency

**Recommendation:** Leverage additional resources through partnerships with utilities and other programs, we recommend that you consider "high residential energy users" and "households with a high-energy burden" in addition to the DOE-prescribed priorities

High Energy Use/High Energy Burden: Household with high heating utility bills. This is calculated by taking the monthly household energy cost and dividing it by the monthly household income. This equals the percentage of energy burden.

Priority Group 1 Energy Burden 35.1 - 50%	6 points
Priority Group 2 Energy Burden 25.1 - 35%	5 points
Priority Group 3 Energy Burden 15.1 - 25%	4 points
Priority Group 4 Energy Burden 10.1 - 15%	3 points
Priority Group 5 Energy Burden 5.1 - 10%	2 points
Priority Group 6 Energy Burden 0- 5%	1 point

# V.5.1 Type of Weatherization Work to be Done



The screenshot shows the NASCSP website interface. At the top left is the NASCSP logo with the text "National Association For State Community Services Programs". To the right of the logo are navigation links for "ABOUT", "CSBG", and "WAP". Further right are social media icons for Twitter and Facebook. Below the navigation is a green bar with the text "Members Only". The main content area is titled "Technical Resources" and includes social media icons for Facebook, Twitter, and LinkedIn. Below this title are four green buttons, each with a plus sign and text: "Energy Audits", "QCI Forms", "Deferrals", and "SWS and Field Guides".

## Technical Guides and Materials

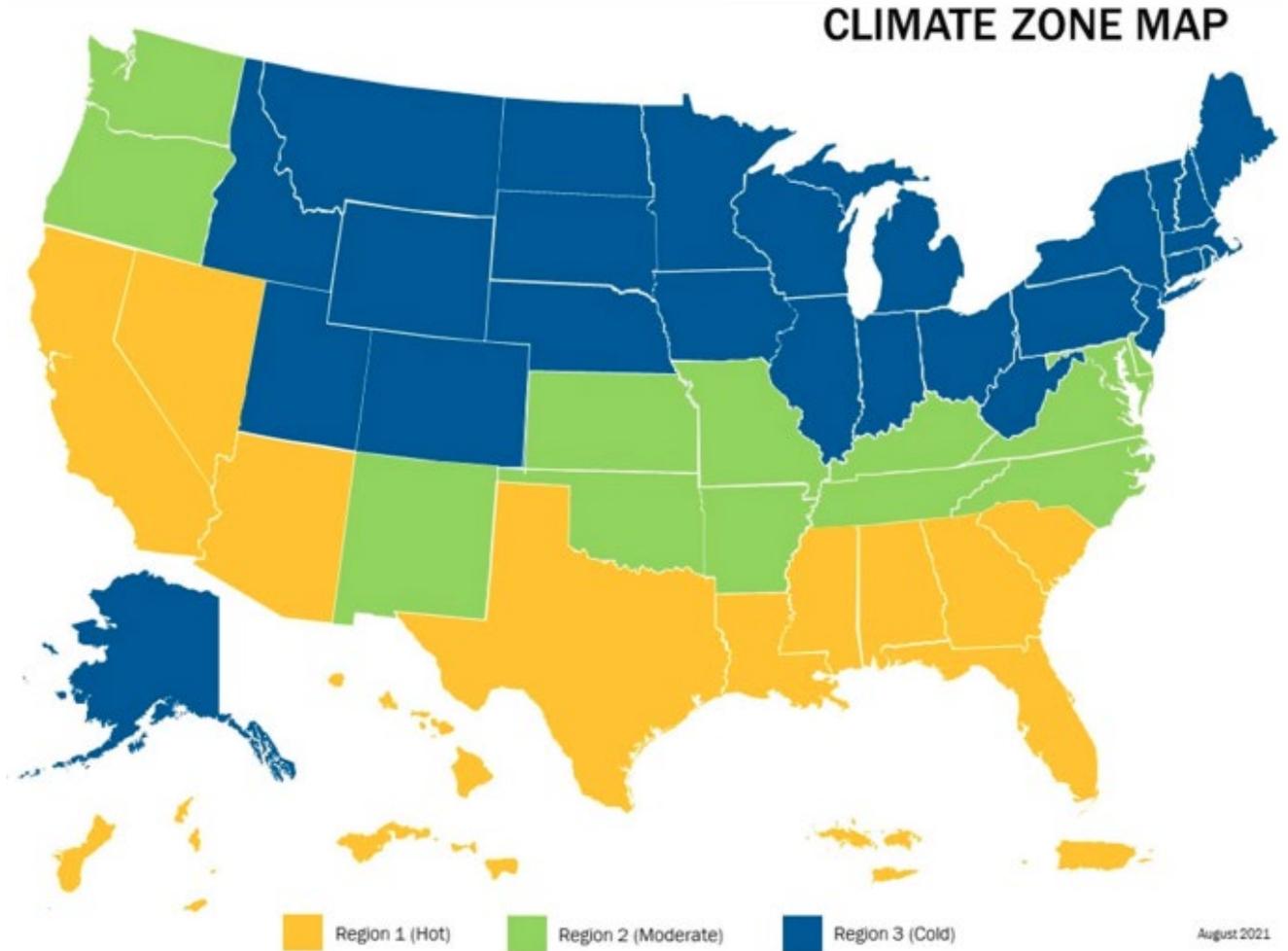
- Consider working with a technical training center to update your technical field guides and energy audit policy and procedures.
- Recommendation: Consider creating a technical subcommittee in addition to the Policy Advisory Council. This committee does not need to be Policy Advisory Council members but could serve to advise members and the grantee. The committee could assist with WAP policy manual updates.
- You can view a myriad of resources on the [NASCSP member portal](#).

# V.5.2 Type of Weatherization Work to be Done

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## Energy Audit Procedures

- Streamline Operations by securing the DOE Approved Priority Lists. WPN 22-8, Memo 114.
- Begin re-approval of Energy Audits 12-18 months before expiration to ensure there is no disruption in service.
- Use of Small MF Priority List as outline in WPN 22-8



# V.5.3 Final Inspection

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- Recommendation: Add innovative ideas to address possible barriers to finalizing units such as below.
- NM State Plan Examples:
- “This program year, Grantee may submit procedures for the QCI mentorship program to our DOE project officer. This will enable an individual who is in the process of obtaining the QCI certificate to conduct the inspection per DOE approved procedures.”

# V.7 Health and Safety

Consider using the *Optional Template*, as strongly encouraged by DOE [WPN 22-7](#). This practice significantly enhances financial transparency, facilitates more accurate program evaluation of H&S investments, and allows for a more strategic and targeted allocation of funds to critical safety priorities.

## Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template*

Grantee Name

### 1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

Enter Additional H&S Information Here

### 2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in the ACPU calculation. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget

Contained in Program Operations

### 3.0 – H&S EXPENDITURE LIMITS

According to [10 CFR 440.16\(h\)](#), Grantees must establish H&S expenditure limits for their Program and provide justification explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

[440.16\(h\)\(2\)](#) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

$$\text{Total Average H\&S Cost per Unit} = \frac{\text{H\&S budget amount}}{\text{Program Operations budget amount}}$$

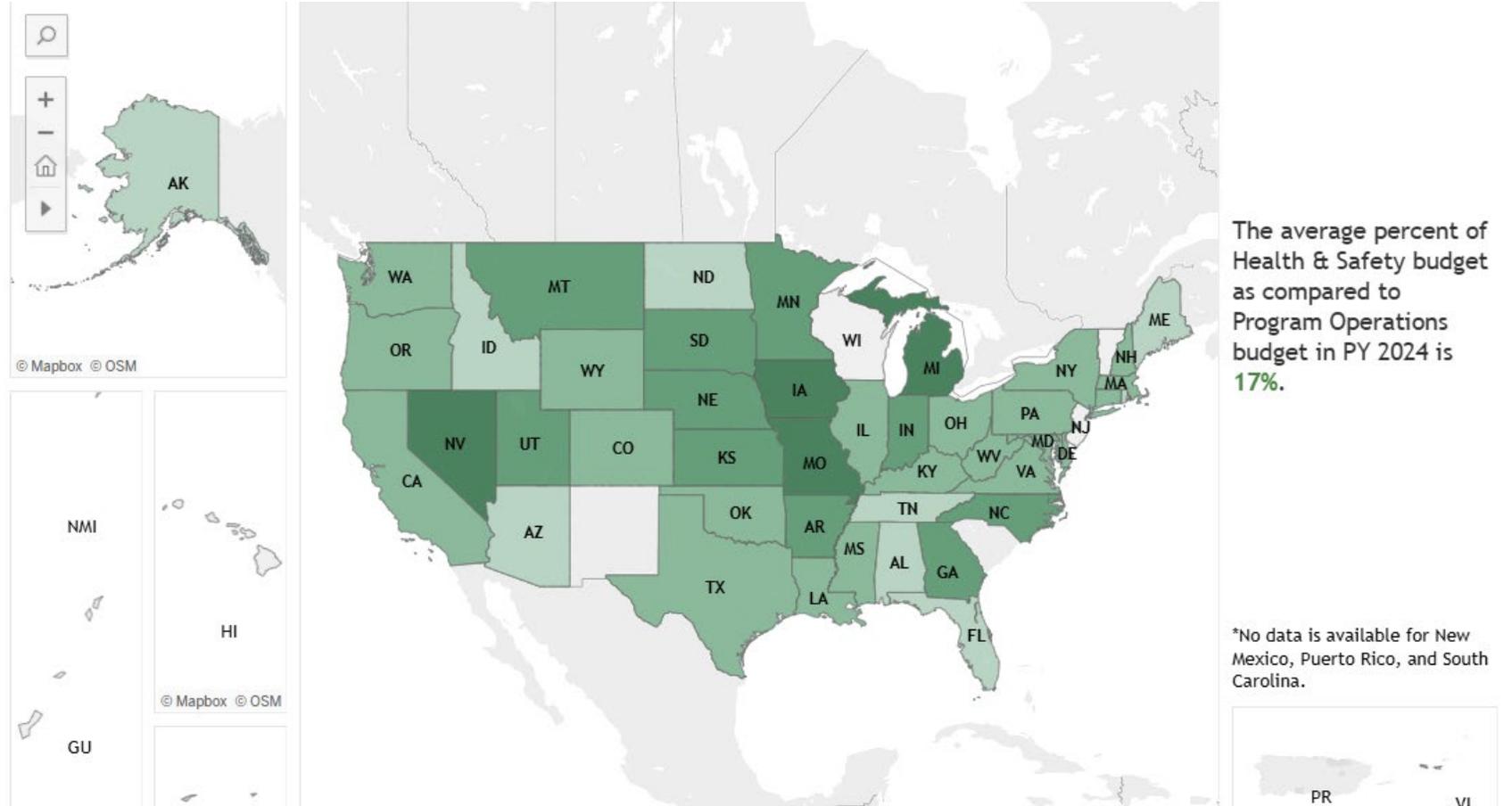
For example, if the ACPU is \$5,000 and a Grantee's Program expends an average of \$750 per dwelling on energy-related H&S expenditures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, such as the availability, etc. Low percentages should include a statement of what other funding supports H&S costs, which higher percentages will require greater justification and relevant historical support.

There is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with expenditures of more than 15 percent of Program Operations used for H&S purposes. DOE strongly encourages using the

Recommendation – increasing cap to 20-35%.

Provide to DOE as part of the State Plan, a detailed analysis of year-over-year comparisons to justify the increase.

PY 2024 Percent of H&S Budget vs Program Operations Amounts by State analysis is available as documentation



## V.7 Health and Safety

# V.8.1 Program Management

## Overview and Organization

- Include how the program administration will differ (if at all) from IIJA to Formula. For example, using one contractor agency for all multifamily units.
- **Best Practice:** Streamline and IIJA and Formula program management to reduce errors.
- **Recommendation:** Grantees are encouraged to communicate overly and often with their subgrantee network on statewide production and expenditure. Examples include monthly office hours, real time dashboards and or monthly production updates.

# V.8.3 Monitoring Activities



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## Monitoring Activities

- When monitoring grants, find synergies between IIJA and formula programs to streamline activities like travel. For instance, monitor both programs at the same subgrantee location to save time.
- **Recommendation:** Mandate Subgrantees to submit detailed monthly or quarterly spend and production plans to enable Grantees to conduct robust variance analysis (planned vs. actual) during monthly desk-top monitoring.

# V.8.3 Monitoring Activities

## GA State Plan

- Recommendation: include corrective action steps when monitoring demonstrates the Subgrantee is not meeting production goals.

- See examples here: [MI State Plan](#),

A subgrantee's failure to meet spend and production goals on two contracts in a 12-month period may result in reduction or termination of funding and removal from the WAP program. GEFA will review the subgrantee's productivity in relation to the established production goals and/or quality of the subgrantee's work on a monthly basis and based upon the subgrantee's specific and performance circumstances, GEFA will take these actions:

- Allow the subgrantee to continue operations at the existing funding level and thereafter conduct more frequent performance review.
- Reduce the funding level for the subgrantee and provide unexpended allocated dollars and service territory to another subgrantee.
- Require the subgrantee to select a non-profit delegate in cooperation and with assistance from GEFA to meet production goals in a specified time frame.
- Reduce the funding to the subgrantee and provide the dollars on a competitive basis to a qualified non-profit to service the defined geographic territory.
- Provide additional funding at a level that can be expended within the grant period, to subgrantees exceeding production and/or meeting quality work standards.

# How frequently does your state review subgrantee spend and production data?



- Monthly
- Quarterly
- Less than quarterly
- As issues arise
- Not standardized

# V.8.4 Training & Technical Assistance

## Approach and Activities

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- When creating a training schedule, ensure all staff are included to guarantee that all team members are properly equipped to perform weatherization functions. To ensure accuracy and consistency, use the DOE-approved template for tracking all training sessions in the [IIJA Workbook](#). A recorded webinar on how to use the tool can be found [here](#).
- Recommendation: Establish a comprehensive contractor incentive plan linked to key performance indicators (KPIs) (e.g., trainings completed, project completion rates, client satisfaction) to ensure the sustained availability of a high-skilled workforce in weatherization roles.

# V.8.4 Training & Technical Assistance Approach and Activities

You can streamline and improve the effectiveness of your training by using a risk assessment. This method will help you identify key areas that need improvement and allow you to tailor your training to address specific weaknesses.

Recommendation: Conduct monthly T&TA calls with subgrantees to review monitor findings. Additionally, T&TA in progress visits to subs are also highly recommended.

[VA State Plan](#) example: Outline training opportunities well in advance for optimal attendance

2025:

- February Program Management Summit with VACAP
- June Technical Interchange
- Fall Peer Exchange with AECP
- Ongoing Individual Program Management Mentoring through VACAP

2026:

- February Program Management Summit with VACAP
- June Technical Interchange
- Fall Peer Exchange with AECP
- Ongoing Individual Program Management Mentoring through VACAP
- 

Other meetings are scheduled as needed.

# Energy Crisis and Disaster Plan

Review updated guidance in [WPN 25-1](#), including allowable charges for staff time and creating a process for prioritizing weatherization services in areas impacted by a disaster.

Recommendation: Consider adding language that address loss of property or vehicles to this section. See [KY State Plan](#).

1. Vehicles - For any vehicles, purchased with DOE funds for the weatherization program, that are damaged by the natural disaster, subgrantees need to file an insurance claim and (with KHC approval) rent a replacement vehicle until insurance determines the damage/loss. KHC will work with subgrantee to determine the best course of action on replacing any totaled vehicles. (Vehicles may be used for clean-up efforts as long as the mileage and gas are not charged to the weatherization program. However, mileage and gas can be charged to the weatherization program if subgrantees can demonstrate that the efforts were in direct correlation to operation of the weatherization program, such as relocation of weatherization files and computers for day-to-day operation.)

2. Damaged weatherization units - See section v.1.2 for re-weatherization instructions if the units were complete. If units were in-progress, see section v.1.2 for instructions for deferrals and contact KHC for further guidance. KHC will assist the sub-grantees in assessing the viability of the unit remaining as a housing unit and the number of repairs the unit needs to be a viable weatherization job in the future. Applicants/units on the waiting list that are total rebuilds must be denied.

3. Subgrantees - Any weatherization subgrantees who would like to assist with emergency repairs or repair/rebuild efforts will need to inform KHC and may not charge the weatherization program for labor, travel, equipment/vehicle use. However, subgrantees are encouraged to help neighbors, and KHC can adjust production expectations to all subgrantees to allow for time to aid in the recovery efforts.

# Resources

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- [DOE Weatherization Program Notices and Memorandums](#)
  - [IIJA-1 and IIJA-2](#)
  - [IIJA -4](#)
  - [IIJA-5](#)
  - [IIJA-6](#)
  - [IIJA-7](#)
  - [WAP Memo 131](#)
- [DOE Approved State Plans](#)
- [LIHEAP State Plan Analysis](#)
- [NASCSP WAP Member Resources](#)
- [Code of Federal Regulations](#)

# Thank you

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