



Arizona  
Department  
of Housing

**WEATHERIZATION ASSISTANCE PROGRAM  
BIPARTISAN INFRASTRUCTURE LAW (BIL)  
FY2022 - 2027  
STATE PLAN**

**ISSUED: SEPTEMBER 2, 2022**

CONTACT INFORMATION:

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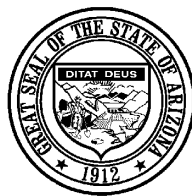
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# ANNUAL FILE

## IV.1 Sub-grantees

Arizona Department of Housing (ADOH) uses ten Sub-grantees to perform Weatherization service throughout the state, including the Indian reservations. The Sub-grantees are as follows:

### **Community Action Human Resources Agency (CAHRA) (CAP Agency)**

**Mary Lou Rosales**, Executive Director  
109 N Sunshine Blvd., Eloy AZ 85131  
Phone: 520-466-1112, Fax: 520-466-0013  
E-mail: [mlrosales@cahrapinal.org](mailto:mlrosales@cahrapinal.org)  
(Pinal County) CD 1, 3, 4  
Labor Source – Contractor  
SAM/UEI: UJL7MUFCV4H9

### **City of Phoenix, Neighborhood Services Department (Unit of Local Government)**

**Thaddis Jackson**, Housing Development Program Manager  
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Phone: 602- 534-7593, Fax: 602-534-8213  
E-mail [thaddis.jackson@phoenix.gov](mailto:thaddis.jackson@phoenix.gov)  
(City of Phoenix) CD 3, 6, 7, 8, 9  
Labor Source - Contractor  
SAM/UEI: KSM4UUTZ6Z75

### **Foundation for Senior Living (Non-profit)**

**Katie Martin, Program Director**  
3051 S. 45th Street, Phoenix, AZ 85040  
Tucson Office: 2227 S. Mission, Tucson AZ 85716  
Phone: 520-302-7744  
E-Mail [kmartin@fls.org](mailto:kmartin@fls.org)  
(City of Tucson) CD 1, 2, 3  
Labor Source – Crew and Contractor  
SAM/UEI: NB22A2EU26C2

### **Gila County Office of Community Services (Unit of Local Government)**

**Malissa Buzan**, Community Services Director, Housing Service Manager  
5515 S Apache Ave., Suite 200, Globe, AZ 85501  
Phone: 928-402-8693, Fax: 928-425-9468  
E-mail: [mbuzan@gilacountyaz.gov](mailto:mbuzan@gilacountyaz.gov)(Gila County) CD 1, 4  
Labor Source – Contractor  
SAM/UEI: C8EKKJK67XB1

### **Western Arizona Council of Governments (WACOG) (Unit of Local Government)**

**Gina Whittington**, Human Services Director  
1235 S. Redondo Center Dr., Yuma, AZ 85365  
Phone: 928.217.7123, Fax: 928.329.4248  
Email: [ginaw@wacog.com](mailto:ginaw@wacog.com)(LaPaz, Mohave, Yuma Counties) CD 1, 3, 4  
Labor Source - Contractor  
SAM/UEI: WJX7JJCXLA36

**Maricopa County Human Services Department, Housing & Community Development Division (Unit of Local Government)**

**Heidi Hopkins Basen**, Training and Technology Lead

234 N Central Ave, 10th Floor

Phoenix, AZ 85004

Phone: 602-506-1416, Fax: 602-506-4749, Cell: 602-312-1649

E-mail: [Heidi.Hopkins@maricopa.gov](mailto:Heidi.Hopkins@maricopa.gov) Maricopa County, excluding City of Phoenix & City of Mesa) CD 1, 3, 4, 5, 6, 7, 8, 9

Labor Source – Contractor

SAM/UEI: MHLNFHVYWD9

**A New Leaf Mesa Community Action Network (MesaCAN) (CAP Agency)**

**Eva Felix**, Program Director

868 E University Dr., Mesa, AZ 85203

Phone: 480-477-4037, Fax 480-969-0039

E-mail: [evfelix@turnanewleaf.org](mailto:evfelix@turnanewleaf.org)

(City of Mesa exclusively) CD 9

Labor Source – Contractor

SAM/UEI: MLZVKA7M2219

**Northern Arizona Council of Governments (NACOG) (Unit of Local Government)**

**Isabel Rollins**, Housing and Community Development Director

3111 N. Caden Ct., Ste. 100 Flagstaff, AZ 86001 Phone: 928-774-3759, Fax: 928-774-3758

E-mail: [isabel.rollins@nacog.org](mailto:isabel.rollins@nacog.org)(Apache, Coconino, Navajo, Yavapai Counties) CD 1, 4

Labor Source – Contractor

SAM/UEI: E6DNLCPGMPS3

**Pima County Community Development & Neighborhood Conservation (Unit of Local Government)**

**Joel Gastelum**, Division Manager, Community & Workforce Development

2797 E Ajo Way, 3rd Floor, Tucson, AZ 85713

Phone: 520-724-6750, Fax: 520-243-6796

E-mail: [joel.gastelum@pima.gov](mailto:joel.gastelum@pima.gov)(Pima County excluding the City of Tucson) CD 1, 2, 3

Labor Source – Contractor

SAM/UEI: EB6GYJJCZD48

**Southeastern Arizona Community Action Program (SEACAP) (CAP Agency)**

**Yvette Ramirez**, Executive Director

283 W 5th Street, Safford, AZ 85546

Phone: 928-428-4653, Fax: 928-428-1559

E-mail: [yramirez@seacapinc.org](mailto:yramirez@seacapinc.org)(Graham, Greenlee, Cochise, Santa Cruz Counties) CD 1, 2, 3

Labor Source – Crew and Contractor

SAM/UEI: NBJPKEMBKYJ8

## IV.2 Production Schedule (DOE WAP BIL Funds only)

Arizona DOE WAP BIL allocation for PY2022 – 2027 is \$47,518,610. The Sub-grantee allocations are calculated according to the allocation method developed in conjunction with the Sub-grantees and the Weatherization Policy Advisory Committee. The maximum rolling average (Average Cost Per Unit, ACPU) investment per unit for the term of the WAP BIL will be \$8,009 unless otherwise detailed by guidance provided from DOE. **DOE H&S, T&TA, and Admin budgets are not included in the DOE ACPU. For the DOE WAP BIL Term and Funds ONLY, Admin funds have been split 60/40 (Sub-grantee/ADOH) to provide additional admin funds for increased demand and requirements in and on office/administrative personnel and supplies. This should also allow for salary adjustments/or COLA (cost of living adjustments) for staff retention, to ensure program sustainability and reduce turnover.**

PY 2022 will begin a 5-year application grant cycle with potential for extensions based on meeting performance goals and metrics. Only funding allocations for the detailed term, and other current funding sources (if applicable), are allowable.

|                              |           | Estimated                 |             |
|------------------------------|-----------|---------------------------|-------------|
| Grantee                      | City      |                           |             |
|                              |           | PY22-27 DOE WAP BIL Funds | Units       |
| CAHRA                        | Eloy      | 2,033,459                 | 183         |
| City of Phoenix              | Phoenix   | 10,266,061                | 954         |
| Foundation for Senior Living | Tucson    | 4,383,690                 | 403         |
| Gila County Community Action | Globe     | 441,622                   | 32          |
| Maricopa County Government   | Phoenix   | 8,047,677                 | 746         |
| MesaCAN/A New Leaf           | Mesa      | 2,749,265                 | 250         |
| NACOG                        | Flagstaff | 4,097,664                 | 376         |
| Pima County                  | Tucson    | 1,906,210                 | 171         |
| SEACAP                       | Safford   | 1,377,809                 | 121         |
| WACOG                        | Yuma      | 2,720,546                 | 247         |
| <b>TOTALS</b>                |           | <b>38,024,003</b>         | <b>3483</b> |

Arizona’s DOE unit production is based on the maximum ACPU per DOE (not including H&S, T&TA, and Admin budgets), which has been capped at \$8,009 for the term of the WAP BIL unless otherwise adjusted by guidance from DOE.

## IV.3 Energy Savings

Production and Energy Savings

These are estimates for PY2022 - 2027

**3483**

Re-weatherized Units

0

Method used to calculate energy savings:

WAP algorithm:  \_\_\_\_\_

Other (describe below):

## IV.4 DOE-Funded Leveraging Activities

The state does not utilize State General Funds for leveraging activities. However, parallel programs are administered through LIHEAP and public utility funding.

## IV.5 Policy Advisory Council

The state's Policy Advisory Council (PAC) is a collaboration of people from various organizations from around the state, each represents the interests of low-income and priority populations through advocacy or assistance programs or both. Although some are also sub-grantees, these agencies represent multiple programs that serve low income, vulnerable households; additional information is included in the paragraphs below. PAC members are from local utility companies, Nonprofits, and local governments. The following is a current PAC member list and a brief description of the organization, including those persons whom they serve:

### **Arizona Public Service - APS**

**Chris Baker**, Program Manager

Home Performance with Energy Star, Weatherization, Residential HVAC, Codes & Standards

400 N. 5<sup>th</sup> Street

Phoenix, AZ 85004

E-mail: [Chris.C.Baker@aps.com](mailto:Chris.C.Baker@aps.com)

Phone: 602-250-3183

APS is the largest and longest serving electric company in Arizona. APS funds programs to assist limited income households with energy savings through their Energy Support Program or the Medical Care Equipment Program. APS' Project SHARE (Service to Help Arizonans with Relief on Energy) specifically targets persons 60 years of age and older, persons under 60 experiencing special hardships and persons with disabilities. The SHARE program assists these targeted persons with payment of their electric bill.

### **City of Phoenix, Neighborhood Services Department**

**Omar Clark**, Project Manager

200 W Washington, 4th Floor, Phoenix, AZ 85003

E-mail [omar.clark@phoenix.gov](mailto:omar.clark@phoenix.gov)

Phone: 602-262-7369, Fax: 602-534-8213

The City of Phoenix, Neighborhood Services Department preserves and revitalizes neighborhoods and helps residents to access city services. Foreclosure prevention, CDBG, housing rehabilitation and emergency repair, lead hazard control, and landlord/tenant counseling are some of the programs for low-income persons offered through this division of the City of Phoenix government.

### **Maricopa County Human Services Department (MCHSD), Housing & Community Development Division**

**Heidi Hopkins Basen**, Training and Technology Lead

234 N Central Ave, 10th Floor

Phoenix, AZ 85004

Phone: 602-506-1419, Fax: 602-506-4749, Cell: 602-312-1649

E-mail: [Heidi.Hopkins@maricopa.gov](mailto:Heidi.Hopkins@maricopa.gov)

Maricopa County, excluding City of Phoenix & City of Mesa) CD 2, 3, 4, 5, 7

The MCHSD mission is to provide and coordinate essential support and social services to vulnerable population to enhance economic, educational and social opportunities and strengthen communities.

**Foundation for Senior Living (FSL)**

**Carrie Smith**, Chief Operating Officer

1201 E Thomas Rd.

Phoenix, AZ 85014

E-mail: [csmith@fsl.org](mailto:csmith@fsl.org)

Phone: 602-285-0505 ext. 142 Work

One of the largest 501(c) 3 organizations in Arizona. Servicing the community since 1974, the organization's mission is to provide home and community based services and develop energy-efficient affordable housing, to promote health, independence and dignity for all. The PAC Member representative for FSL is not responsible for the day-to-day operations of the WAP Program and therefore remains a third party advisory member.

**Gila County**

**Malissa Buzan**, Community Action & Housing Services Manager

5515 S Apache, Suite 200

Globe, AZ 85501

E-mail: [mbuzan@gilacountyaz.gov](mailto:mbuzan@gilacountyaz.gov)

Phone: 928-402-8693 - Work

The Community Action Program (CAP) in Gila County has been in existence since 1980. CAP receives funding from the Arizona Department of Economic Security, Pinal Gila Council for Senior Citizens, Arizona Department of Housing, and many other funding sources. The funding is geared towards helping residents become more self-sufficient through case management and emergency assistance. Programs offered through Gila County include Utility Payment/Deposit Assistance, Eviction Prevention Rent Assistance, Utility Discount Programs - APS, Southwest Gas (SWG), Lifeline, Weatherization, Housing Rehabilitation and Emergency Repairs. Applicants for assistance must meet federal Poverty Income guidelines and have a documented need. The PAC Member representative for Gila County is not responsible for the day-to-day operations of the WAP Program and therefore remains a third party advisory member.

**Northern Arizona Council of Governments (NACOG)**

**Isabel Rollins**, Housing and Community Development Director

119 E Aspen

Flagstaff, AZ 86001

E-mail: [Isabel.rollins@nacog.org](mailto:Isabel.rollins@nacog.org)

Phone: 928-774-3759 - Work

NACOG is a nonprofit membership corporation representing local governments to provide a wide variety of services within the four Arizona counties of Apache, Coconino, Navajo, and Yavapai. NACOG is the Area Agency on Aging, Head Start and Workforce Development agency for the region. Additionally, NACOG provides weatherization, housing rehabilitation and emergency repairs for low-income households, targeting the elderly and families with children.

**Salt River Project (SRP)**

**Bonnie Temme**, Community Relations Program Manager

P.O. Box 52025

Phoenix AZ 85072-2025

E-mail: [Bonnie.temme@srpnet.com](mailto:Bonnie.temme@srpnet.com)

Phone: 602-236-5643 - Work



SRP is the oldest multipurpose federal reclamation project in the United States. SRP has been serving central Arizona since 1903, providing electricity to approximately 1 million retail customers in a service area that spans three (3) Arizona counties. SRP offers a variety of programs to help customers save energy and money. These programs target rebates for purchase of new energy-efficient heat pumps, thermostats, shade screens, duct testing and repair, and discounted LEDs. SRP also offers Home Energy Audits (HEA) to promote and educate homeowners about energy efficiency throughout their homes. Additionally, SRP has an online Marketplace that provides discounted energy efficiency and water saving devices that can be shipped directly to the customer's home.

**Southwest Gas (SWG) Corporation**

**Celine Apo**, Energy Efficiency Administrator

5241 Spring Mountain Road

Las Vegas, NV 89193-8510

P.O. Box 98510, Mail code: LVB-105

Las Vegas, NV 89193-8510

E-mail: [celine.apo@swgas.com](mailto:celine.apo@swgas.com)

Phone: 702-876-7149 - Work

SWG has been providing natural gas service for eighty plus years and currently serves more than 1.9 million customers throughout Arizona, Nevada and California. SWG has customer assistance programs for low-income households such as no cost to the customer weatherization repairs and utility bill assistance payments in addition to rebates for appliance connections to natural gas.

**UNS Energy Services/Tucson Electric Power (TEP)**

**Edith Garcia**, Contract Administrator

PO Box 711 (Hqw505) Tucson, AZ 85702

E-mail: [EGarcia@tep.com](mailto:EGarcia@tep.com)

Phone: 520-623-3451 - Work

TEP and its sister company, Unisource Energy Services offers comprehensive energy services through reliable, traditional resources and a growing renewable power portfolio. TEP/UNS also offer many ways to help customers use energy more efficiently. Additionally, TEP/UNS assists limited income (based on federal poverty levels) customers through discounts, weatherization, and emergency bill payment programs.

**Wildfire (a.k.a. Arizona Community Action Association)**

**Cynthia Zwick**, Executive Director

340 E. Palm Lane, Suite #315

Phoenix, AZ 85004

E-mail: [czwick@wildfireaz.org](mailto:czwick@wildfireaz.org)

Phone - 602-604-0640 - Work

Wildfire is a 501 (c)(3) non-profit agency created in 1967 to address poverty across Arizona. Through a collaboration of nearly 300 organizations and individuals, WildfireAZ develops and implements strategies to address and ultimately eliminate poverty.

**Arizona PIRG (Arizona Public Interest Research Group) Education Fund**

**Diane E. Brown**, Executive Director

835 W. Warner Rd. – Ste. 101-464

Gilbert, AZ 85233

E-mail: [dbrown@arizonapirg.org](mailto:dbrown@arizonapirg.org)

Phone - 602-252-9227 - Work

Arizona PIRG Education Fund works to deliver results-oriented public interest policy that protects consumers and encourages a responsive, democratic government. Arizona PIRG Education Fund helps educate Arizonans about energy efficiency programs available in Arizona and advocates to use related taxpayer dollars efficiently and effectively.

## IV.6 Hearing and Transcripts

### Public Hearing

The Arizona Department of Housing (ADOH) held the official public hearing for input and comment on the Plan on **Thursday, September 29, 2022**. The Hearing was held through web based video conferencing technology at **1:00 PM Arizona time**. ADOH to perform the transcript duties of the hearing. The date, time, and web link to the Public Hearing was provided to Sub-grantees, Policy Advisory Council (PAC) members and other interested parties through email, and posting on the Arizona Department of Housing website at [www.housing.az.gov](http://www.housing.az.gov) on **September 7, 2022, which is 22** days prior to the date of the public hearing. Additionally, the hearing was advertised in five (5) major newspapers in the state including the Arizona Daily Sun (Flagstaff), Arizona Daily Star (Tucson), Arizona Republic (entire state), Kingman Daily Miner (Kingman) and the Yuma Sun (Yuma). Documented evidence of postings, publications, hearing transcripts and attendance are included as an attachment to the SF424 Application.

## IV.7 Miscellaneous

**Business Officer: Kathy Blodgett, PCED, CDR Programs Administrator, 602-771-1021**

[kathy.blodgett@azhousing.gov](mailto:kathy.blodgett@azhousing.gov)

**Weatherization Program Manager/Principal Investigator: Travis Ekenberg, 602-771-1071,**

[travis.ekenberg@azhousing.gov](mailto:travis.ekenberg@azhousing.gov)

**Financial & Program Monitoring: Gloria Castro, Weatherization Program Specialist, 602-771-1084**

[Gloria.castro@azhousing.gov](mailto:Gloria.castro@azhousing.gov)

**Technical & Field Monitoring: Samantha Winslow, Energy Specialist, 602-771-1046**

[Samantha.winslow@azhousing.gov](mailto:Samantha.winslow@azhousing.gov)

**ADOH staff positions charging less than 100% of their time to the DOE Weatherization Grant will be paid by other funding sources. The budget and Plan propose the addition of two additional Technical and one additional Financial Program Monitor(s), as needed based on production and ramp up occur.**

**Only those ADOH Sub-grantees that expended more than \$750,000 in total Federal Funding during PY21 will receive FINANCIAL AUDITS funds identified in ADOH's SF-424a Budget.**

**Use of Weatherization Funds for Renewable Energy Systems**

Not Applicable

Weatherization Readiness Funds (WRF) WPN 22-6

These funds are not allowed to be used in conjunction with ANY project utilizing WAP BIL funding. For additional guidance, refer to WPN 22-6.

### **Carryover Rule**

There will be no carryover for FY 2022 per DOE WPN 22-1. The DOE WAP BIL is for a five (5) year term and may be extended, if allowed by DOE, based on performance goals and metrics.

### **\*\*\*This rule only applies if DOE allows the Grantee to carry over any remaining funds from the previous program year.**

ADOH concurs with DOE that Sub-grantees should be making every effort to expend funds allocated for a specific program year, in that year. ADOH has adopted the policy that any Sub-grantee that does not expend at least 90% of their allocated funds for a given program year will not be eligible to receive carry over funds if/when available. All carry-over funds will be equally distributed to the sub-grantee agencies who expended at least 90% of their allocated funds from the previous program year. However, ADOH reserves the ability to a secondary carry-over policy due to extenuating circumstances.

### **Performance Based Funding Re-allocation**

Quarterly performance goals and standards are made a part of the contractual agreement between the Grantee and Sub-grantees. The Grantee may, based on a review of the progress of Sub-grantee completed units and expenditures, move funds from a non or under-performing Sub-grantee to a Sub-grantee meeting or exceeding their performance goals. The Grantee will review the performance of all Sub-grantees on a monthly basis. The first re-allocation of funds would occur at 6 months with additional re-allocations if needed at the 8-month and 10-month time periods. It is the goal of the Grantee to use this method to ensure annual program funds are expended thereby reducing or eliminating carry-over and improving overall program performance.

**ADOH will be working to improve the condition of Sub-grantee vehicles and equipment. Working with the Department of Energy and LIHEAP, a plan for this will be under development in the near future.**

## **IV.7.1 DOE WAP BIL SPECIFIC GUIDANCE**

### **Flow-down Requirements**

#### **Davis Bacon**

Davis Bacon (prevailing wages) will only be required for work performed on multifamily buildings using DOE funding, with not fewer than 5 units. In the past 5 years, DOE funding has not been used for such types of projects as non-federal funding has been available and dedicated to multifamily specific properties.

#### **Buy American**

As outlined in OMB M-22-11, the Buy American provision will not be a requirement on non-infrastructure projects as defined. Non-infrastructure projects include “construction or improvements of a private home for personal use”. Should additional guidance be provided, ADOH will adhere as necessary.

## Equity and the Justice40 Initiative

Justice40 is a whole-of-government effort to ensure that Federal agencies work with states and local communities to deliver at least 40 percent of the overall benefits from Federal investments in climate and clean energy to disadvantaged communities. For additional information, see Executive Order 14008, [Federal Register: Tackling the Climate Crisis at Home](#) (<https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad>), and the Office of Management and Budget (OMB) [Memorandum 21-28](#). Additional guidance from OMB is anticipated in 2022.

The NREL State and Local Planning for Energy (SLOPE) tool found at <https://maps.nrel.gov/slope/data-viewer?layer=eej.household-energy-burden&res=county&year=2020&filters=%5B%5D>, can be utilized to view High Energy Burden areas statewide. The following tool can assist in determining what and where disadvantaged communities, as defined by DOE, are located statewide; <https://energyjustice.egs.anl.gov/>. This will provide Sub-grantees with potential focus areas when marketing and tracking Justice40 metrics.

ADOH is awaiting additional guidance with respect to Justice40 requirements and clarification, and will provide further instruction to the Arizona WAP Network when this is available.

## Workforce Development and Arizona’s “5-year Plan”

Over the next five (5) years, ADOH intends to grow the weatherization network to not only accommodate the influx of WAP funding, but further ensure a sustainable network to provide energy efficient retrofits to low-income households. The AZ WAP network has already engaged with stakeholders, community partners and leaders, non-profit agencies, and will begin engaging with trade partners and various educational platforms.

A major focus within the initial 12-18 month timeframe will be on recruitment from underserved neighborhoods and surrounding areas, providing dual service to these areas. Providing well-paying high-quality jobs to individuals in impoverished areas, will help by bringing financial gains by way of paychecks as well as pride in neighborhoods and the trust that comes from neighbors helping neighbors thrive and grow. The WAP is all about helping residents in need and there is no better way than for able individuals to assist within their own communities.

ADOH will need additional staff to ensure adequate monitoring and training needs are met and will look to hire at minimum, two (2) additional Energy Specialists and one (1) additional Weatherization Program Specialist. The existing AZ WAP State Plan as well as this document, includes verbiage to retain third-party BPI Certified Auditors should the need arise, for additional inspections outside of what may be capable by ADOH Staff. The AZ WAP Network as a whole, will need to “ramp-up” as was done during ARRA, and will work together collaboratively to recruit and partner as needed, to provide additional services statewide. A portion of the allocated T&TA funds will be utilized to fund a WAP training position as necessary, to meet DOE critical training as well as provide training and labor funds for contractors that hire new employees who assist with service delivery in the WAP.

## Production and Expenditures

Over the next five (5) plus years, Arizona will be working on increasing the WAP labor force and providing WAP services to thousands of eligible Arizona residents in need. The first 18-24 months after DOE has approved this final plan, will be focused on recruitment and training a sustainable workforce, development and implementation of a new and modernized AZ WAP Database, updating of outdated/antiquated systems and equipment, followed by 36+ months of enhanced delivery of energy efficient and health and

safety services to the qualified households. Production assumptions will reasonably increase quarterly until all funds are expended and all goals/milestones have been achieved.

A note to this timeline is, the original WAP BIL submittal date detailed by DOE was set for July 1, 2022 and had been extended to October 1, 2022. This pushes the ability to issue contracts to sub-recipients throughout Arizona, until the State Plan is approved and a funding agreement is formally issued from DOE. The assumed start date for production and expenditures to occur will be July 1, 2023 to keep contracts consistent with other Federal Grants and reporting periods provided and expected by and from ADOH.

### WAP BIL Fund Tracking and Reporting

Projects with DOE WAP BIL funding will be tracked and reported separately from projects with regular DOE WAP funds. DOE WAP BIL projects shall not have regular DOE funding incorporated whatsoever. Sub-grantees are expected to provide separate Job Cost Submittal forms for projects funded with regular DOE funds and projects with DOE WAP BIL funding. All other fund sources shall follow the existing guidance and requirements as detailed in the regular AZ WAP State Plan, as well as contracts provided from ADOH and other entities.

### Purchase of Vehicles and Equipment with WAP BIL Funds

The purchase of vehicles and equipment specifically for the use in the WAP, is allowable under each Sub-grantee’s program allocation and **WILL** figure into the ACPU. The cost may be **amortized** as detailed below. T&TA and Admin allocations cannot be used for these types of purchases. Sub-grantees shall follow DOE guidance and procurement requirements as well as procurement regulation as detailed in the ADOH Procurement Handbook. This handbook can be found under the “Handbook” section on the ADOH website at: <https://housing.az.gov/documents-links/handbooks>. Additional DOE guidance is detailed in WPN 17-6: <https://www.energy.gov/eere/wap/downloads/wpn-notice-17-6-property-acquired-under-weatherization-assistance-program>. These processes shall be followed to avoid denied reimbursement requests. **\*\*\*Prior Approval Requirements must be followed\*\*\***

**Amortization:** *As stated in 10 CFR 440.18(c)(3), for the purposes of determining the average cost per dwelling limitation, costs for the purchase of vehicles or other certain types of equipment, as defined above, may be amortized over the useful life of the vehicle or equipment. Amortizing these costs over the useful life of the vehicle or equipment provides the Grantee with a reasonable approach in determining the average cost per home, even though the full purchase price is reported in the year in which it occurs. For example, if a Subgrantee purchases a new vehicle for \$24,000 with an expected useful life for the vehicle of 8 years (96 months), the cost of that vehicle could be amortized at the rate of \$3,000 per year or at \$250 per month.*

For clarification, *Per 2 CFR 200.33, Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.*

# MASTER FILE

## V.1 Eligibility

Every dwelling weatherized must meet both client and building eligibility requirements. Eligible dwelling units per 10 CFR 440.22 are as follows:

“(a) A [dwelling unit](#) shall be eligible for weatherization assistance under this part if it is occupied by a family unit:

- (1) Whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget; or
- (2) Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security [Act](#) or applicable [State](#) or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance; or
- (3) If the [State](#) elects, is 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.”

Weatherization Program Notice (WPN) 22-5, Expansion of Client Eligibility in the Weatherization Assistance Program, issued by the U.S. Department of Energy (DOE), serves to streamline the WAP intake process by expanding WAP’s categorical income eligibility **to include** U.S. Department of Housing and Urban Development’s (HUD) means-tested programs’ income qualifications at or below 80% of Area Median Income. (Examples of HUD program but not limited to Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), Lead Hazard Control & Healthy Homes Program (OLHCHH), etc.).

This guidance allows for qualified applicants/households under HUD’s means-tested programs using percentages of Area Median Income (AMI) ranging from 30% AMI to 80% AMI, to automatically be granted WAP program eligibility. The method and documentation of verification of eligibility must be included in the WAP client file.

### **Arizona definition of low-income:**

Household Income is at or below 200% of the federal poverty level determined in accordance with criteria established by the Office of the Secretary, U.S. Department of Health and Human Services.

### **Arizona definition of Children**

A dependent at or below the age of five (5) years.

### **Arizona Definition of Elderly**

A person who is 60 years of age or older.

## V1.1 Approach to determine client eligibility

The Sub-grantees are to follow the intake procedures of the most current state income qualifying guidelines found in the Low-Income Home Energy Assistance Program (LIHEAP) Policy Manual available from the Arizona Department of Economic Security (DES) website at:

[https://des.az.gov/sites/default/files/LIHEAP\\_Policy\\_Manual\\_2021.pdf?time=1645131973941](https://des.az.gov/sites/default/files/LIHEAP_Policy_Manual_2021.pdf?time=1645131973941)

The LIHEAP State Plan for Arizona has been approved to mirror the income eligibility allowed by DOE at 200% or below of the Federal Poverty Limit (FPL). Sub-grantees should also reference WPN 22-3 for Poverty Income Guidelines and Definition of Income.



Each DOE client file must contain an application from the client that includes the required demographics and income for the entire family living in the residence. The file must also contain evidence provided by the Sub-grantee that the client is income eligible to receive WAP services. This evidence may include, but is not limited to, third party verification from the source of income for the family (employer, social security office, unemployment agency, etc.); source documentation for each income source listed on the application; or evidence of cash assistance payments under Title IV of XVI of the Social Security Act or applicable State or local law at any time during the preceding 12 month period for any household member. These documents must be retained in hard copy for each client.

ADOH WAP has provided a Client File Checklist that Sub-grantees must use and keep in their client file. The form is available from the ADOH website at: <https://housing.az.gov/documents-links/forms/weatherization>

The following information is required (some are required only if applicable such as the Landlord/Tenant Form) to be included in client files:

1. Client File Checklist (required)
2. Eligibility Determination (including the required Annual Income Calculations Form) & Client Information including hard copy evidence provided by the Sub-grantee that the client is income eligible to receive WAP services. This evidence may include, but is not limited to, third party verification from the source of income (employer, unemployment agency, social security office) of the family or source documentation for each income source listed on the application.
3. Certification of Zero Income Form (required if applicable)
4. Proof of Ownership or Signed Rental Agreement
5. Deferral Information (if applicable)
6. State Historic Preservation Documentation (if applicable)
7. Previous Weatherization Checklist (required form)
8. Clients Rights and Responsibilities Form (required form)
9. Client Complaints and Documented Resolution (if applicable)
10. Progress Form; Includes client sign-off on:
  - a. Receipt of "Client Rights and Responsibilities Form"
  - b. Client Agreement (visits for quality assurance and funder monitoring)
  - c. Receipt of Warrantees
  - d. Statement of Completion
11. Household Action Plan (required form)
12. Client Health and Safety Evaluation Forms (2)
  - a. Client use (if client so chooses)
  - b. Auditor use (required form)
13. Work Agreement/Scope of Work
  - a. Form is supplied by Sub-grantee
  - b. Must be signed by Client
  - c. Must include any Low Cost/No Cost measures
14. Priority Checklist or Copy of the Energy Model with Field Waiver Request (if applicable), Health & Safety (HSD) Waiver
  - a. required if DOE/SWG HSD will exceed \$2,000
  - b. Must be approved and signed by ADOH Energy Specialist
15. Residential Diagnostic Evaluation Form (required form)
  - a. Initial Inspection and Diagnostics
  - b. Final Inspection and Diagnostics
  - c. Project Photos Pre-work and Post work (may be inserted into form or saved separately)
  - d. Photos of Appliances/HVAC before and after replacement (may be inserted into form or saved separately)
16. Quality Control Inspection Checklist (required form for DOE funded projects)



17. Hazard Disclosure Form; Includes client sign-off that information, notifications and release were given to them regarding:
  - a. Lead Paint
  - b. Mold Assessment and Release
  - c. Radon
18. Lead Safe Weatherization (if applicable)
  - a. Testing results showing no lead; or
  - b. Lead Safe Work Practices documentation per EPA requirements, Include Certified Renovator Documentation and photographs demonstrating proper practices were followed.
19. Materials and Labor Costs: including invoices and purchase orders (Contractor and crew based)
20. Bid/Equipment/Calculation/Specification Details
21. Inventory Sheets (if applicable)
22. Low-Cost/No-Cost Documentation
  - a. Cannot exceed \$250
  - b. Notations must be made in the AZWAP database indicating what the actual low cost/no cost measure was and break out the amounts by funding source used for the measure.
23. Landlord/Tenant Agreement (required form if applicable)
24. Refusal for Services, Indemnification & Waiver of Claims
25. Health & Safety (HSD) Waiver
  - a. Required if DOE or SWG HSD will exceed \$2,000
  - b. Must be approved and signed by ADOH Energy Specialist or WAP Staff
26. Sub-grantee Statement of Completion
27. Utility Information Release Authorization Form
28. Sub-grantee Contractor Oversight Form (if applicable)

The client is income eligible for weatherization services for twelve (12) months from the date the client was determined to be income eligible, contingent upon residence eligibility. A client must be re-certified when eligibility lapses due to the length of time the client was waiting to receive Weatherization services. Re-certification of income eligibility must occur at least once every twelve (12) months.

Sub-grantees shall give priority to clients based on the list of priorities established in the Arizona State Plan, which includes the following:

1. Elderly persons aged at or above the age of sixty (60) years.
2. Persons with Disabilities
3. Families with children at or below the age of five (5) years.

The criteria used for determining applicant priority must be in writing and on file with the Sub-grantee. An actual wait list to determine who is next to receive weatherization services must be developed with consideration given to the priority populations listed above.

For HUD-DOE Multi-Family eligibility, see the Multi-family section of plan.

#### **Qualified Aliens Receiving Weatherization Benefits**

Grantees are directed and encouraged to review guidance provided by Health and Human Services (HHS) under LIHEAP. This guidance can be found by going to <http://www.aspe.hhs.gov/hsp/immigration/restrictions-sum.shtml#sec1>.

HHS Information Memorandum LIHEAP-IM-25 dated August 28, 1997, states that all qualified aliens, regardless of when they entered the United States, continue to be eligible to receive assistance and services under the Low-Income Home Energy Assistance Program (LIHEAP) if they meet other program requirements.

To eliminate any possible contradiction of eligibility for Weatherization services at the state and local level for qualified aliens, the definition adopted by HHS will also apply to the DOE WAP.

HHS issued Information Memorandum LIHEAP-IM-98-25 dated August 6, 1998, outlining procedures for LIHEAP and Weatherization grantees serving non-qualified aliens to implement new status verification requirements.

To ensure continuity between LIHEAP and WAP for the many Sub-grantees operating both programs, the DOE WAP will follow the interpretation as adopted by HHS.

## **V1.2 Approach to determine building eligibility**

**Sub-grantees must document the eligibility of the residence to receive weatherization assistance through the following process:**

1. Verify that the home's occupants are income qualified for WAP
2. Verify that the home has not been previously weatherized by a thorough examination of the following:
  - a. The state database (azwap.org)
  - b. Previous weatherization client files
  - c. The Sub-grantees weatherization program internal tracking system (i.e. database or spreadsheets)
  - d. Database or Visual inspection of unit for evidence of previous retrofit weatherization measures. (Observation of weatherization improvements will not necessarily preclude the unit from the WAP program. Database and Client File check as well as audit diagnostics may indicate unit is eligible.
3. Perform a site inspection of the unit to make sure the condition of the home is safe to perform weatherization work

The Sub-grantee must then complete the ADOH Previous Weatherization Checklist form and retain it in the Client File. The Previous Weatherization Checklist Form is available for download from the ADOH weatherization web page at: <https://housing.az.gov/documents-links/forms/weatherization>

**The Grantee will monitor for the eligibility of the residence through the following process:**

1. Perform desktop review of the State's database for 100% of submitted jobs. This helps to verify income levels as well as the eligibility of measures and their SIR prior to any reimbursement of expenditures to the Sub-grantees.
2. During field inspections, the Grantee Weatherization Program Specialist will monitor a random sampling of ten percent (10%) of client files on completed jobs for proper documentation of income eligibility. If Grantee determines that the Sub-grantee is not following policies and procedures currently and consistently, the Grantee will increase the percentage of Sub-grantee client files sampled.
3. Verify that the State's Previous Weatherization Checklist form has been completed, signed and included in the Client File.

### **Re-weatherization**

Dwelling units weatherized (including dwelling units partially weatherized) under the DOE WAP program, or under other Federal programs including LIHEAP, HUD or USDA (in this paragraph referred to as 'previous weatherization'), may not receive further financial assistance for weatherization until the date that is 15 years after the date such previous weatherization was completed. This does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under the DOE WAP program or under other Federal programs, or from receiving non-Federal assistance for weatherization.

Sub-grantee will conduct research to the best of their abilities and include documentation in the client file, the methods of determination of previous weatherization and the timeframe therein. Without a centralized database for recipients of all federal funding and records retention requirements, Sub-grantees may not have access to precise information but shall ensure due-diligence when performing re-weatherization on eligible properties.

Client files will be documented according to the policies set forth in the Eligibility V.1, V1.1 sections of this State Plan as well as the Building Eligibility V.1.2 section. A full energy audit will be required.

Under the Energy Crisis and Disaster Relief, section of the Arizona State Plan, Disaster Planning and Relief is addressed and references DOE-issued Weatherization Program Notice (WPN) 12-7, which allows additional work to be done on homes due to natural disasters. Grantee and Sub-grantees will refer to these sections and follow appropriate procedures if the Sub-grantee wishes to serve homes located in disaster areas.

If the occupancy of the dwelling unit changes to another low-income family, the dwelling unit does not become eligible for additional weatherization. A dwelling is not eligible for weatherization, even if occupied by an eligible household, if a federal, state or local program has designated the dwelling for acquisition or clearance within 12 months from the scheduled date weatherization would be completed.

#### **Use of WAP Funds for Add-on/Call-back Work**

Grantees and Sub-grantees may not charge DOE for additional work on homes that have already been reported to DOE as completed, weatherized units. WPN 11-03 provides specific guidance on this type of activity.

*Note: Under no circumstances can any of these activities be covered under the re-weatherization provisions of 10 CFR §440.18(e) (2) (iii).*

#### **Eligible Structures**

Once a client has been deemed income qualified then residence eligibility can be determined. Eligible residences must be safe for the occupants; Sub-grantees; crews; and/or contractors to work in without concern for their health and safety.

The primary housing types served by the Arizona WAP program are single family (both block and stick built construction), manufactured housing/mobile homes (refer to AZ WAP P&P Manual for further clarification) and multi-family housing. Sub-grantees should exercise caution in dealing with non-traditional type residential units such as shelters, and apartments over businesses, etc., to ensure they meet program regulations for eligibility. Consideration on weatherizing these types of units should be coordinated with the Grantee.

The weatherization of non-stationary campers, travel trailers, RV's, and 5<sup>th</sup> wheel travel trailers that have an eligible applicant/s is not allowed. Mobile homes must either have an Affidavit of Affixture or a title with the "MH" designation in the body style box to be eligible for WAP services.

#### **Co-Op Properties**

A property will be ineligible for weatherization assistance if the owner is not detailed by documentation through the County Assessor, a mortgage statement, or other legal document showing clear and specific ownership. If multiple individuals are detailed as owners of the property but one or both do not reside at the residence, all named owner's income shall be counted unless a written rental agreement is provided upon application. If the residence is a rental unit, the ADOH Landlord Tenant Agreement Form **MUST** be

completed. Federal funds cannot be used for measures/equipment that are required to be provided by the Landlord/Owner renting the property per the AZ Landlord Tenant Act, A.R.S. Title 33.

### **Primary Residence**

Weatherization work may only be performed on the applicant's/owner's primary residence. For example, where "Mother-in-Law" quarters or secondary/detached buildings are present, only the primary zoned building or main housing unit as accessed from the street where the address is detailed/located will be eligible to receive weatherization services.

### **Rental Units/MF Buildings**

All Sub-grantees are required to weatherize single family, manufactured (mobile home) and multi-family rental housing.

The State of Arizona has established a policy to ensure that Sub-grantees weatherizing rental units determine financial eligibility and obtain written permission of the owner or owner's agent. In multiple unit buildings, the state ensures sixty-six (66) percent (50 percent for duplexes or four unit buildings) of the building to be eligible units. The State's policy also ensures that the benefits of weatherization accrue primarily to the tenant, including units where the tenants pay for their energy through their rent. ADOH WAP recognizes that it may weatherize shelters under conditions set forth in CFR 440.22.

State policy regarding rental units specifies that for a reasonable period of time (not less than twelve months) the tenant will not be subjected to rent increases unless those increases can be demonstrated to be related matter and conditions other than the weatherization measures performed. Sub-grantees must obtain the Landlord and Tenant's signature on the Landlord/Tenant Agreement form. State policy also provides an avenue for complaint in such matters. Tenants and landlords are informed in writing that no undue or excessive enhancement shall be provided to the rental unit or building by weatherization assistance, this is to include the installation of heating and air conditioning units, and appliances, as this is required to be provided by the landlord pursuant to A.R.S 33-1324:

<https://www.azleg.gov/ars/33/01324.htm>

All documentation shall remain the property of Grantee and in the event of program closure, by either Grantee or the Sub-grantee; such files shall revert to Grantee. Copies of these documents need to be placed in each client file of the complex.

If a multi-unit building is under an assisted or public housing program identified by the U.S. Department of Housing and Urban Development (HUD), the property owner, manager or authorized agent will follow the Property Certification Procedure outlined below:

### **Property Certification**

The property owner or authorized agent of the property must sign a Self-Certification form attesting that:

1. The property owner or authorized agent maintains certified income records for households residing at the property.
2. The property owner or authorized agent has reviewed its current certified income records.
3. The property owner or authorized agent has determined that at least 66 percent of the units in each building (or at least 50 percent of the units for 2- and 4-unit buildings) have certified incomes that are at or below 200 percent of the current federal poverty level based on household size.
4. The property owner or authorized agent certifies that all the information provided with the certification request is true and accurate.

### Property Occupancy Report

The property owner or authorized agent must also complete and submit an Occupancy Report for the property.

Required property information includes:

1. property name
2. HUD contract number
3. contract expiration date
4. other property identification number (if applicable)
5. Property address and number of buildings and units that are at the property that meet DOE's income requirements.

Required building-unit information includes:

1. A listing of all units and information for each unit including:
  - a. building identification
  - b. building address
  - c. certified annual income
  - d. household size, and
  - e. Whether the household income was certified in the last year.

Upon completion of the Property Certification and the Multifamily Occupancy Report, the property owner (or property owner's representative) will submit both files to HUD at [energyaction@hud.gov](mailto:energyaction@hud.gov) and to DOE at [Derek.Schroeder@ee.doe.gov](mailto:Derek.Schroeder@ee.doe.gov). The submitted documentation will then be reviewed by HUD following the process outlined below:

1. HUD will review the certification and accompanying documentation for completeness. If the documentation submitted by the property owner is insufficient for HUD to complete its review, HUD will notify the property owner via e-mail that the request cannot be approved based on the information submitted.
2. HUD will review the household and property information provided under the self- certification process with records maintained by HUD, and may request additional occupancy information subject to Federal requirements.
3. If the documentation is complete and one or more of the buildings at the property meet DOE's income eligibility requirements, HUD will designate the property or list of qualified buildings as income-qualified properties/buildings, and will notify Dereck Schroeder at DOE and the building owner.
4. HUD will at the same time provide DOE with a list of the income-certified buildings pursuant to the above procedures; DOE will post these lists on its web site as required by 10 CFR 440.22 (b)(1), 440.22 (b)(2), and 440.22(b)(4).
5. Buildings determined by HUD to be eligible for WAP assistance will be posted on one of two lists:
  - a. List 1 – Public housing buildings or privately-owned buildings with three or more years remaining on their affordability contracts with HUD are included on this list. As outlined in the January 2010 Final Rule, inclusion on List 1 demonstrates compliance with the following three WAP multifamily program requirements:
    1. DOE's income requirements:
      - a) Protection against rent increases; and
      - b) Protection against undue enhancement of the weatherized building.
  - b. List 2 – Buildings on this list have less than three years remaining on their Housing Assistance Payments (HAP) contract with HUD. As outlined in the January 2010 Final Rule, inclusion on List 2 demonstrates compliance with only the following two multifamily program requirements:
    1. DOE's income requirements; and
    2. Protection against undue enhancement of the weatherized building. Buildings on this list must separately comply with the WAP program requirement for protection against rent increases.

For further clarification and guidance, refer to WPN 16-5 Multifamily Weatherization and 22-5 Categorical Eligibility.

### **Multifamily-Specific Guidance**

This WPN (22-5) simplifies (and supersedes) procedures previously outlined in WPN 17-4, [Multifamily Housing – Procedure for Certifying Income-Eligible HUD Assisted Buildings](#). WAP Providers generally encounter three types of multifamily properties assisted by HUD: (1) housing owned and operated by HUD Public Housing Agencies (PHAs), (2) privately-owned multifamily buildings receiving project-based assistance, and (3) privately-owned multifamily buildings that house residents who receive tenant-based (housing voucher) assistance.

- Housing owned and operated by PHAs: WAP providers shall consider all such buildings managed by the PHAs referenced in [this HUD Web page](#) to be 100 percent income eligible.
- Privately owned multifamily buildings receiving project-based assistance: WAP providers should refer to these [lists](#) to determine the percentage of the units in each building that are income eligible.
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance: WAP providers will determine the percentage of income eligible residences by either contacting the building owner/manager to obtain such Section 8 Housing Choice Voucher records (from HUD’s Tenant Based Rental Assistance Program [TBRA]) or by individually verifying which residents hold such vouchers.

Additional changes in procedures directly related to verification of families receiving HUD assistance in multifamily buildings and how those buildings will be qualified going forward will be included in updated FAQs, available through the respective DOE Project Officers.

U.S. Department of Agriculture (USDA) and Low Income Housing Tax Credit (LIHTC) Properties: The certification procedures outlined in this Guidance do not apply to LIHTC properties, or for properties with USDA guaranteed loans. The LIHTC and USDA lists of income-eligible properties are no longer valid and will no longer be updated; WAP providers should follow standard procedures for verifying individual resident incomes for USDA and LIHTC properties.

### **Leased Dwelling Units**

Note: Grantees and Sub-grantees are reminded that the supporting documentation for applicants applying for weatherization that may be on a wait list or for other reasons must have their income eligibility documentation updated every 6 months from the date of the initial intake date.

Certain buildings containing rental units may comply with the income eligibility requirements when fifty percent (50%) of those dwelling units are eligible dwelling units rather than the established sixty-six percent (66%) identified in the regulation. (10 CFR 440.22(b) (2)). The buildings that are subject to the fifty percent (50%) threshold are duplexes, four-unit buildings, and certain eligible types of large multi-family buildings. In the final rule published on December 8, 2000, DOE provided guidance on what types of large multi-family buildings may be subject to the 50 percent (50%) threshold. (65 Fed. Reg. 77210, Dec. 8, 2000.)

DOE indicated that “certain eligible types of large multi-family buildings” are those buildings for which an investment of DOE funds would result in a significant energy-efficiency improvement because of the upgrades to equipment, energy systems, common space, or the building shell. (Id. at 77215) By providing this flexibility, Sub-grantees are better able to select the most cost-effective investments and enhance their partnership efforts in attracting leveraged funds and/or landlord contributions. This flexibility does not

apply to any other type of multifamily unit. Questions on whether a building meets the criteria should be directed to the DOE Project Officer.

The definition of “significant energy improvement” is based on specific criteria for the building in question. This must be assessed using existing conditions to determine the threshold to achieve significant energy improvements. Grantees should consult with their DOE Project Officer if there are questions related to this threshold. Additional guidance is being considered by DOE to provide Grantees criteria for what constitutes “significant energy improvement.”

As a reminder, when addressing multi-family units with DOE funds, multiply the total number of income-eligible units in the multi-family building by the current allowable per dwelling unit average cost to determine the amount of DOE funding available for weatherizing the building. While the amount of funding available for weatherizing a building is limited by the number of eligible units, the weatherization work can result in improvements to all units in the building, even those that are not eligible units. All units should be reported to DOE.

**Note:** Grantee and Sub-grantee agencies should exercise caution when utilizing flexibility in this area. The key is the investment of DOE funds coupled with leveraged resources that result in significant energy savings. Absent this investment, lowering the eligibility to fifty percent (50%) may lead to disallowed costs. Sub-grantees who are uncertain on a given multi-family project should seek approval by the DOE Project Officer through their Grantee Weatherization Program Manager.

**Deferral/Referral**

The decision to defer work in a dwelling is difficult, but necessary, in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of assistance are identified. Note that Sub-grantees, including crews and contractors, are expected to pursue reasonable options on behalf of the client, including referrals, and to use good judgment in dealing with difficult situations.

DOE encourages the tracking of deferrals using consistent terminology for recording the *reasons* and *what repairs would be necessary* in order to proceed with weatherization. When repairs are necessary in order to install energy efficiency measures, but those repairs are beyond the allowable limits of incidental repairs and/or health and safety cost categories, deferral is often required. If other funding sources were available, it would increase the number of low-income homes WAP could effectively weatherize. DOE WAP has developed a [tracking tool](#) to provide consistent terminology and a brief [video](#) training describing how the tool is organized.

Deferral conditions may include, but are not limited to:

1. Sub-grantee is unable to verify client income in full
2. The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
3. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
4. The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed.
5. The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities.
6. Moisture problems are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
7. Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing health and safety measures.



8. The client, other household occupants or third party representatives are uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.
9. The extent and condition of lead-based paint in the house would create further health and safety hazards.
10. If determined by the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.

When Sub-grantees have determined a home will be deferred the Sub-grantee must:

1. Inform the client in writing as to why the dwelling cannot be weatherized. If there are conditions that the client must correct before service is provided, those conditions must also be stated in writing.
2. Refer the client to any alternate program such as home rehab, if one is available in the area.
3. Clearly indicate in the client file why the dwelling was given "deferral" status.
4. Document all referrals to other programs or services in the client file.
5. Provide the client any information prescribed in the Client Health and Safety Form (Auditor Use).

Upon denial of weatherization program services, the applicant shall be given a copy of the Sub-grantee's grievance procedure as established in the Sub-grantee's adopted WPGs or program Policies and Procedures.

Each Sub-grantee is to have a grievance process in place if any client is denied services; rent is increased due to the improvements on a weatherized rental property within the first 12 months after completion of the weatherization or other concerns or issues about WAP. The process must be given to the client in writing, at the time of intake. This process will be verified during fiscal monitoring of the Sub-grantees.

### **V1.3 Definition of Children**

Any person living in the home who is at or below the age of five (5) years.

### **V1.4 Approach with Tribal Organizations**

Assistance to low-income members of an Indian Tribe is equal to the assistance provided to other low-income persons.

Members of a sovereign Tribal nation with residences located within the borders of the State of Arizona that are income and residence qualified are considered a local applicant and may receive services through the ADOH Sub-grantee WAP provider serving their area. Tribal members served by the ADOH Sub-grantee network will be required to obtain permission from their Tribal Councils for weatherization work performed on their property by outside parties including local governments or non-profits and their contractors. Permission must be obtained before work can begin.

## **V.2 Selection of Areas to be served**

Arizona utilizes 10 local Weatherization agencies to fully implement the State Plan and provide service to the eligible population of Arizona. Project service areas are historical in nature, originating many years ago at the time of community action agency establishment in Arizona. Service area boundaries are typically drawn along county Lines and include all tribal lands within those counties.



Individual Sub-grantees must meet the requirements of 10 CFR 440.15 and are selected on the basis of their:

1. Experience and performance in Weatherization or housing renovation activities;
2. Experience in assisting low-income persons in the area to be served; and
3. Capacity to undertake a timely and effective Weatherization Program.
4. Preference is given to any Community Action Agency or other public or non-profit entity, which has, or is currently administering an effective program under 10 CFR 440.15 or under Title II of the Economic Opportunity Act of 1964, with program effectiveness evaluated by consideration of factors including, but not limited to the following:
  - a. The extent to which the past or current program achieved or is achieving Weatherization goals in a timely fashion;
  - b. The quality of the work performed by the Sub-grantee;
  - c. The number, qualifications and experience of staff members of the Sub-grantee
5. Any new or additional Sub-grantee shall be selected at a public hearing and must meet the above criteria
6. Grantee staff onsite inspection of performance of the Sub-grantee
7. Transcripts of the public hearing which affirm that there are no public objections to any of the Sub-grantees selected.

In addition, eligible Sub-grantees must meet the following requirements:

1. For units assisted with DOE funding the Sub-grantee or their designated service provider must have an in-house state certified energy auditor to perform initial audits.
2. For units assisted with DOE funding the Sub-grantee or their designated service provider must have an in-house Quality Control Inspector (QCI) or an agreement with an independent QCI contractor as defined in section V5.3 of this plan.
3. Sub-grantees must be in compliance with all ADOH contracts for all programs and funding sources.
4. New Sub-grantees if applicable, must submit a comprehensive WAP Program Management Plan within 90 days of being selected to receive WAP funds. The submission of the Management Plan must include copies of liability insurance; equipment calibrations; evidence of Lead Firm Certification; project implementation schedule; and an organizational chart that outlines the job responsibilities of each person working in the WAP program and their respective certifications.
5. Sub-grantees must have developed WAP Program Guidelines (WPGs) or Weatherization Policies and Procedures that have been approved by ADOH and adopted by their governing body.

The ten (10) Sub-grantees chosen to perform weatherization work are located in the Annual File under Sub-grantees.

### V.3 Priorities

Sub-grantees shall give priority to clients based on the list of priorities established in the Arizona State Plan which includes the following:

1. Elderly persons aged at or above the age of sixty (60) years.
2. Persons with Disabilities
3. Families with children at or below the age of five (5) years.

The criteria used for determining applicant priority must be in writing and on file with the Sub-grantee. An actual wait list to determine who is next to receive weatherization services must be developed with consideration given to the priority populations listed above. Categories **1 – 3** are the **only** allowable priorities for the **DOE WAP**.

Consideration of “high residential energy users” and “households with a high energy burden” (as defined in 10 CFR 440.3) may be in combination with other priority categories of elderly, persons with disabilities, families with children, or households with Veterans as detailed in the LIHEAP State Plan. The consideration of “high residential energy users” and “households with a high-energy burden” enables Grantees and Sub-grantees to better partner with utilities and other programs to leverage additional

resources into their programs. The NREL State and Local Planning for Energy (SLOPE) tool found at <https://maps.nrel.gov/slope/data-viewer?layer=eej.household-energy-burden&res=county&year=2020&filters=%5B%5D>, can be utilized to view High Energy Burden areas statewide. The following tool can assist in determining what and where disadvantaged communities, as defined by DOE, are located statewide; <https://energyjustice.egs.anl.gov/>. This will provide Sub-grantees with potential focus areas when tracking Justice40 metrics. Sub-grantees are encouraged to consider opportunities to pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Collection and reporting of such demographic information is not required currently. If such documentation becomes a requirement, a formal notice will be provided to all Sub-grantees via Technical Bulletin from ADOH.

From time to time, DOE undertakes initiatives to improve WAP operations and effectiveness. This section informs Grantees of these priorities. They are not considered Program Policy until provided in a related WPN.

## V.4 Climatic Conditions

The climate conditions for Arizona range from low dry arid desert to mountain/alpine cold. The summer months of the desert from June through September will bring a dry heat ranging from 90–120 °Fahrenheit (32–49 °Celsius), with occasional high temperatures exceeding 125 °Fahrenheit (52 °Celsius). The winter months of the plateau and High Mountain/alpine range of the state experience extremely cold temperatures from cold air systems from the northern states and Canada pushing into the state bringing temperatures below 0 °Fahrenheit (–18 °Celsius) to this area of the state. Data on the heating and cooling degree-days was obtained through the BizEE Degree Days Weather Data for Energy Professionals website at: <http://www.degreedays.net>.

Climate zones were chosen based on analysis of elevation, average temperatures and the heating and cooling degree-days of each city and zone. The balance point chosen for the heating and cooling degree-day data is 65°Fahrenheit. As of November 23, 2016, Arizona WAP was approved by DOE to use three heating/cooling degree-day climate zones. A map of the approved climate zones has been included as an attachment to the SF-424. The three zones are as follows:

1. **Zone 1 - Plateau Province:** Zone 1 has the coolest average temperatures, highest elevations and mainly heating degree-days. This zone encompasses the Northern portion of Arizona and consists of forests and mountains. The range of heating degree-days for the area is 4,000 to 6,400. Zone 1 includes some communities along the northern border of the state that are on the plateau, have higher elevations but that drop below the heating degree-days range as stated. However, these communities do have a number of cold days.
2. **Zone 2 – Central Transition:** Zone 2 is the transition zone between the higher and lower elevations. This zone encompasses the center of Arizona and consists of mountainous and highland regions. Zone 2 has middling elevations and moderate heating and cooling degree-days. The range for Cooling Degree day is 1200 to 2200 and the Heating Degree Days is 2200 to 3800.
3. **Zone 3 - Basin Province:** Zone 3 is the zone with the highest average temperatures, lowest elevations and the most cooling degree-days. This zone encompasses the Southern portion of Arizona and consists of hot desert and basin regions with cooling degree-days more prevalent than heating degree-days. The range for cooling degree-days is 2,500 to 5,200 for this area of the state

## V.5 Type of weatherization work to be done

### V5.1 Technical Guides and Materials

Grantee, in consultation with the South West Building Science Training Center (SWBSTC) has developed Arizona Success with Weatherization (Field Guide) in compliance with the outcomes and objectives outlined in the Standard Work Specifications (SWS) for Home Energy Upgrades in WPN 22-4, Section 1. The Field Guide was distributed to all Sub-grantees who received a hard copy, digital copy and a web address where the guide can be accessed on-line. Upon receiving the Field Guide, the Sub-grantee signed a document acknowledging their receipt. This document must be put in the Sub-grantees program file and updated annually. Sub-grantees are held accountable to make sure all weatherization work meets or exceeds the standards set forth in the Field Guide. The Arizona Field Guide can be downloaded from the ADOH website at: <https://housing.az.gov/documents-links/handbooks>

Grantee contracts with Sub-grantees contain language, which documents that the sub-grantees and their contractors are required to follow SWS for work quality as outlined in WPN 22-4, Section 1 and instructs the Sub-grantees to include the SWS Specifications for work quality standards in contractor agreements.

**Grantee will ensure that Sub-grantees are providing their contractors with the required information on their expectation of work quality, and program guidance by including the following language in their contract, this verbiage shall also extend to the Sub-grantee’s contracts with their contractors/vendors:**

*“DOE WAP funds require adherence to the following provisions as revised: (1) 10 CFR Part 440 as revised; (2) the Arizona Weatherization Assistance Program State Plan (State Plan); (3) Health and Safety Plan (HSD Plan); (4) the Arizona Weatherization Policies and Procedures Handbook; (5) Arizona Weatherization Assistance Program Field Guide; (6) Standard Work Specifications; and (7) DOE WPN 22-4 Quality Work Plan.”*

1. *All energy audits performed will meet or exceed the requirements set forth in WPN 19-4*
2. *The ADOH Receipt of Field Guide Verification form must be completed and signed by all appropriate representatives on an annual basis. This form can be found at: <https://housing.az.gov/documents-links/forms/weatherization>*

During fiscal monitoring, Grantee will ensure that the language and required signatures for the field guide are in the Sub-grantee contractor files.

Consistent with the approved energy audit or priority list, all materials used for weatherization must meet 10 CFR 440, Appendix A to Part 440—Standards for Weatherization Materials. This can be found at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=23fe3d3cfcc461955f6c730af864c7c7;rgn=div5;view=text;node=10%3A3.0.1.4.24;idno=10;cc=ecfr#10:3.0.1.4.24.0.85.22.50>

Grantee submitted the updated Arizona Success with Weatherization Field Guide to the Department of Energy for review and approval on April 9, 2021.

In order to ensure energy efficiency and health and safety goals are met, Sub-grantee will ensure and document proper removal and disposal of all replaced appliances and mechanical equipment from the residence. All replaced appliances and mechanical equipment must be properly recycled and removed from the energy grid permanently. Weatherization Clients may not retain any equipment being replaced

through the Weatherization Assistance Program (this includes all gas and electric appliances and/or mechanical equipment).

Weatherization Program Notices can be accessed via the following link

<https://www.energy.gov/eere/wap/weatherization-program-notices-and-memorandums>.

Weatherization Program Memorandums can be accessed via the following link

<https://www.energy.gov/eere/wipo/weatherization-program-guidance>.

## V5.2 Energy Audit Procedure

Audit Procedures and Dates Most Recently **Approved by ADOH for NON-DOE funded projects**

1. Single-Family: REM 16.0.2 and OptiMiser as of 7/1/2022
2. Manufactured Housing: REM 16.0.2 and OptiMiser as of 7/1/22
3. Small and Large Multifamily: REM 16.0.2 as of 7/1/2022

Audit Procedures and Dates Most Recently **Approved by DOE**

1. Single Family: REM as of 2/23/2022
2. Manufactured Housing: REM as of 2/23/2022
3. Small Multi-family (5-25 units, each unit separately heated/cooled): Arizona WAP currently does not have an approved multifamily priority list and must go through DOE for approval.
4. Large Multifamily (26 or more units): Arizona WAP currently does not have an approved multifamily priority list and must go through DOE for approval. See multifamily section for further details.

The OptiMiser Energy Modeling Tool is currently in the process of submittal to DOE for review and approval. Once DOE has given ADOH full approval, a Technical Bulletin will be provided to the AZ WAP Network to allow this as an approved energy modeling tool.

The WAP Energy Audit Procedure must be used by all Sub-grantees to gather record and analyze data on structures. This data must be used to deliver weatherization materials/measures in a fashion that protects the health and safety of the client, increases the durability of the structure, reduces client energy costs and increases client comfort in a cost effective manner. Sub-grantees or their designated service provider will complete an ADOH Residential Diagnostic Evaluation (RDE) Form or its equivalent for the initial audit and testing. Incomplete RDE forms will be returned to the sub-grantee for completion prior to approval of monthly reimbursement requests.

Additional guidance on the use and expectations of the REM and OptiMiser energy modeling software can be found in the ADOH WAP Policies and Procedures Manual as well as the revised AZ WAP Audit and Inspection Process and Procedures Manual. These documents can be found at:

<https://housing.az.gov/documents-links/handbooks>.

The following audit activities must be completed on all homes utilizing DOE WAP funds.

1. A site audit that meets WPN 19-4 requirements, and records all relevant data on the structure needed to perform cost effectiveness tests.
2. The Cost Effectiveness Procedure must be followed to determine cost effectiveness of potential weatherization materials/measures
3. The Pressure Diagnostic Procedure must be completed and the findings documented following the Reporting Procedures
4. A health and safety audit of the structure must be completed and the findings documented following the Reporting Procedures

5. A final inspection of the structure must be completed and findings documented following the Final Inspection Procedures

### Degrading Heating/Cooling Systems

Unlike combustion appliances, air conditioners and heat pumps cannot be accurately measured for efficiency while on-site. When addressing a system that utilizes a compressed refrigerant cycle to provide heating or cooling, Sub-grantees may use the following degradation formula:

$$\text{Degraded Efficiency} = (\text{Base EFF}) * .99^{\text{age}}$$

Where:

1. Base EFF = Typical efficiency of Pre-Retrofit equipment when new (Seasonal Energy Efficiency Ratio (SEER), Energy Efficiency Ratio (EER), or Heating Seasonal Performance Factor (HSPF))
2. Age = Age of equipment in years.

### For Example: An existing HVAC unit that is 20 years old, was originally rated at 10 SEER

$$\text{Degraded SEER} = 10 * .99^{20}$$

$$\text{Degraded SEER} = 10 * .818$$

$$\text{Degraded SEER} = 8.18$$

Any other variation of the de-rating process or formula is not allowed unless first approved by DOE in writing. Degradation of combustion appliances in lieu of testing for combustion efficiency is not allowed. Degradation does not apply to evaporative coolers.

### A site-specific computer energy modeling by OptiMiser or Residential Energy Model (REM) is required if:

A site-specific computer energy model will be required if any of the following exist:

1. The Arizona Weatherization Priority List (priority list) is not approved or has expired
2. There are potential cost-effective energy upgrades to the house that are not on the priority List
3. The home being weatherized does not meet the priority list assumptions square footage + or – fifty percent (50%).
4. There are not sufficient funds to complete all the measures including energy related health and safety measures and other energy related repairs
5. Energy related incidental repairs of more than \$100 are included with the energy upgrades.

When preparing a site-specific energy model using the approved software detailed above, the measures listed for the respective climate zone and building type are modeled with any additional measures. The savings-to-investment report is then created ranking all measures by SIR from greatest return to least. Grantee will request and review by random selection twenty – five percent (25%) of each Sub-grantees' completed projects prior to approving payment for the submitted projects for the detailed month. Should errors or concerns be found, Sub-grantee will be required to adjust funding appropriately and the amount of required review will increase to a minimum of seventy-five percent (75%) and an Energy Model preauthorization waiver will be necessary for a minimum of six (6) months or until concerns are no longer found.

### Buy-Downs/Leveraging of Funds

This guidance included in WPN 16-5 and DOE Memorandum 035, addresses how Grantees (or Sub-grantees administering the Program) can use investments from other sources to buy down measures in order to meet the program requirements that the SIR of the complete project is at least 1.0 or greater as required in section 440.21 for the WAP investment.

It is DOE's aim to bring as many non-federal resources as possible into the program to buy down measures that do not meet the individual SIR requirements in the initial model run. To create even greater flexibility, in addition to landlord contributions, Grantees may use other sources, including ***Federal*** sources to buy down measures provided the Grantee has permission from the other federal source(s). The LIHEAP State plan details that Weatherization Measures funded with LIHEAP are not subject to DOE Savings to Investment Ratio (SIR) Standards.

NOTE:

- All associated health and safety costs incurred on a dwelling unit are generally treated outside the SIR when determining cost-effectiveness. However, all energy-related incidental repair measures associated with weatherizing the dwelling units are a part of the SIR when determining cost-effectiveness.

It is DOE's intent to allow Grantees and Sub-grantees some flexibility in calculating the SIR for a specific measure when other funds can be used to offset some of the costs, thereby reducing the DOE investment and raising the SIR to 1.0 or greater on the remaining investment. When performing the energy model on an eligible dwelling unit, the total costs associated with the installation of eligible measures can be discounted by other resources leveraged for that particular measure in determining the SIR.

Sub-grantees utilizing this guidance will need to conduct an initial energy audit of the building to determine the cost-effectiveness of the DOE investment, including measures that are not cost-effective without leveraged resources. Those agencies that have non-DOE resources for use in the building will need to run the energy audit a second time with the necessary resources for any specified measure(s) to ensure the total package of measures remain at least with an SIR of 1.0 or greater. A second energy audit run can be eliminated by indicating what measures will need to utilize this flexibility and the amount of funds necessary to accomplish the buy-down.

Further, it is not DOE's intent to "leapfrog" measures that are already cost-effective in order to accommodate a measure that is included in the package of measures as a result of using the provisions of this guidance. All measures that were cost-effective after the initial energy model is conducted would remain a part of the list of measures to be completed on the building. Measures that did not attain the SIR of 1.0 can only be considered for buy down if all the cost-effective measures in the initial model are also installed. To clarify, these measures that fall below the 1:1 SIR in the original model but meet the 1:1 requirement after buy down, will be the "last measure(s)" to be installed in the package of measures. All measures meeting the 1:1 SIR in the original energy model **SHALL** be installed prior to any measures where a buy down has been applied.

The following steps are recommended in order to determine what other funding is necessary to leverage for a measure that would otherwise not meet WAP SIR requirements:

1. Using the full, non-leveraged cost of all measures, conduct an initial energy audit of the building to determine the package of measures to be paid for using DOE funds having a combined SIR of 1.0 or greater, including measures that are not cost-effective without leveraged resources.
2. Determine whether sufficient funds from other resources are available to offset measures with individual SIRs below 1.0 in that package, up to at least an SIR of 1.0.
3. Apply (deduct from the measure total) those other funds to that measure and include it in the package of measures.
4. Document the inclusion of the leveraged measure into the weatherization statement of work/work performed page in the State Database, with the original energy audit and either

- a. A summary of all costs associated with the weatherization of the building, including any or all resources to be used, or
- b. A revised audit in which the leveraged price of the additional measure is used as the measure cost. This documentation will become part of the building's customer file along with the inputs and results of both energy audits.

As the Grantee updates to the most current DOE approved Energy Modeling versions, communication will be sent to the Sub-grantee agencies through the Arizona WAP Technical Bulletin process to flow down updated requirements.

### **Fuel Switching**

WAP does not permit the general practice of non-renewable fuel switching when replacing furnaces/appliances. The AZ WAP does allow the changing or converting of a furnace/appliance using one fuel source to another on a limited, case-by-case basis. These approvals will only be granted when all related costs demonstrate the effectiveness of the fuel switch over the life of the measure. Fuel switching **will NOT be permitted using DOE** funding under the AZ WAP.

To request consideration of a waiver for approval of fuel switching, the sub grantee must submit a request that includes a site-specific REM demonstrating cost effectiveness or a valid H&S explanation for fuel switching, to the ADOH Energy Specialist **PRIOR TO** any work being done. The waiver request and supporting documents will be reviewed by the ADOH Energy Specialist for approval. Failure to submit a waiver prior to work will result in disallowed cost.

### **Multifamily Audit procedures**

Multifamily: As defined by DOE, multifamily buildings are five (5) or more units in a single building.

As multifamily units represent less than 20 percent of the state's dwelling type weatherized, we are not required to, and currently do not have a multifamily audit process approved by DOE. The state will treat multifamily units as any other dwelling seeking weatherization. If the units meet both the client eligibility and building eligibility, weatherization is permitted. The Sub-grantee must follow all applicable state laws when dealing with rental properties and the requirements put forth on the property owners.

Because the state does not have an approved multifamily audit process, all multifamily projects **UTILIZING DOE FUNDING SHALL** be submitted to DOE through the Grantee's CD& R Program Administrator and approved prior to any work being started. The following information is required in order for the project to be submitted to Grantee and sent to the DOE Project Officer for approval.

1. Site plan of complex
2. Pictures of complex
3. Results of audit completed on the complex
4. ASHRAE 2016 calculations
5. Scope of Work
6. Budget consisting of:
  - a. Measure to be performed using DOE funds and cost
  - b. Measure to be performed using leverage funds and cost

### **V5.3 Final inspection**

A weatherized unit is a dwelling unit on which an approved energy audit or priority list has been applied and weatherization work has been completed. Sub-grantees and their contractors/vendors have an obligation to perform their work to the SWS and the Arizona Weatherization Field Guide. The use of DOE funds on a unit may include, but are not limited to: auditing, testing, measure installation, and inspections.

Therefore, a dwelling unit meeting both the definition of a DOE weatherized unit and has DOE funds used directly on it, may be included in the DOE production numbers reported. In order to make sure these requirements are met, two separate inspections must be completed. A Sub-grantee Post Construction File Review and a Quality Control Final Site Inspection must occur and pass for all completed homes in order for them to be considered a completed DOE job and be reimbursed for expenditures. The Quality Control Site Inspection on DOE funded projects is to be considered the “final inspection” provided no corrections are required after the QCI is completed. If corrections are required after the final QCI, the same Quality Control Inspector will re-inspect the items in concern to ensure all detailed corrections have been made and no further concerns remain.

Note: Weatherization crews and/or individuals that install weatherization measures (perform any ECM work) on a unit, shall not perform the Sub-grantee Post Construction Review of the unit. DOE does not allow the Final Inspection to be performed by a person(s) directly associated with actual work that was performed on the DOE funded unit. In the event that this provision cannot be met due to staffing levels or budget constraints, Grantee must be notified immediately to assist with acquisition of qualified individuals necessary to perform the Final Inspection(s) meeting the above mentioned criteria.

A Post Construction File Review by the Sub-grantee or Sub-grantee designated service provider:

1. Shall be performed after all work is completed and final diagnostic test out has been performed.
2. Shall be performed on all DOE jobs before it can be counted as a DOE completed job.
3. Shall verify that all cost effective opportunities were completed.
4. Shall verify all invoices for the job are billed correctly and nothing is billed for services/work not performed.
5. Shall verify that the reported house characteristics are correct.
6. Shall include a review of the diagnostic result, both pressure and combustion safety, to verify that all applicable tests were completed.
7. Shall complete or be physically/virtually present for diagnostics on a minimum of ten percent (10%) of completed homes to compare with reported results.
8. Shall include a review of all measures listed on the Work Performed Report to verify installation has been completed in an effective manner following program requirements.
9. Shall also include an analysis of the energy audit to ensure that it was completed properly; all applicable areas of the audit have been addressed; and the scope of work reflects a comprehensive energy audit.

Once a Sub-grantee or their designated service provider has completed their Post Construction Review, the job must be turned over to a qualified Quality Control Inspector (QCI) for a Quality Control Inspection. A qualified QCI will be someone who has been certified by the Building Performance Institute (BPI) to perform Quality Control Inspections for weatherization. After the QCI has reviewed and passed the job, it may be reported as a DOE completed home to the Grantee and DOE. The Quality Control Inspector is not expected or required to ensure household/client qualification. This will be the responsibility of each Sub-grantee’s designee during the Post Construction File Review.

A Quality Control Inspection:

1. Shall be conducted after all work by the Sub-grantee is completed and their Post Construction Review has been completed.
2. Shall be performed on all jobs before they can be counted as a DOE completed project
3. Shall include an analysis of the energy audit to ensure that it was completed in an efficient manner with all areas of the audit having been addressed and the scope of work reflects a comprehensive energy audit.
4. Shall verify reported diagnostic numbers are correct.
5. Shall verify that all cost effective measures were completed.
6. Shall verify that all invoices for the job are invoiced properly, nothing billed incorrectly, or billed for services/work not performed.



7. Shall include a review of the diagnostic results for pressure and combustion safety to verify that all applicable tests were completed.
8. Shall include a review of all measures listed on the Work Performed Report to verify installation has been completed in an effective manner, following program requirements.
9. Shall verify the work was performed to the SWS provided by the Department of Energy and the Arizona Weatherization Field Guide.
10. Shall fill out and sign the ADOH WAP QCI Checklist, sign it and provide a copy for the file, stating the unit is complete and ready to be reported to ADOH WAP and DOE. The QCI Checklist is available from the ADOH WAP website at: <https://housing.az.gov/documents-links/forms/weatherization>.

There are two types of QCI Inspectors:

1. The independent QCI inspector is an inspector that was not involved in the job except for the Quality Control Inspections. The individual did not perform the initial audit or any work on the home. In this scenario, the Grantee principle investigator (aka Energy Specialist) must field monitor for Quality Assurance, five percent (5%) of DOE completed jobs (no less than one (1)). The percentage of jobs to be field monitored will round up to the nearest whole number.
2. The Auditor/QCI Inspector is a person that performs the initial audit and develops the scope of work but is not involved with any of the construction or installation of energy conservation measures or materials performed on the home. This same individual performs the Quality Control Inspection. If this method is used by a Sub-grantee, they will be subjected to more oversight and the Grantee Principal Investigator (aka Energy Specialist) will field monitor ten percent (10%) of DOE completed jobs (no less than two (2)). The percentage of jobs to be field monitored will round up the nearest whole number. Several Sub-grantees for the Arizona WAP program have a designated service provider who has QCI certified staff. The designated service provider will be an acceptable Auditor/QCI as long as the QCI Certified staff of the service provider did not perform any construction or installation of energy conservation measures or materials.

The State WAP program allows the Sub-grantee to select which type of QCI method they will follow for the program year thereby determining the level of Grantee oversight of the Sub-grantee.

### **Lack of Compliance with QCI**

If a Sub-grantee is found to be in violation of the requirements of the Quality Control Inspection process, they will be formally notified in writing by the Grantee. The write-up will:

1. Indicate where the Sub-grantee is failing at following the required process.
2. Indicate where the Sub-grantee can find the state level or other guidance needed to help address the concern.
3. Request the Sub-grantee create a plan of action in writing on how they will fix the concerns, modify their process going forward and submit within 30 days of receipt of the non-compliance letter.
4. Require that the corrective plan is followed and the process is improved.
5. Require Grantee to:
  - a. Reject jobs and hold funding to Sub-grantees if there were jobs that did not receive a Quality Control Inspection by the Sub-grantee.
  - b. Place the Sub-grantee on a 90-day probation period upon discovery of non-compliance.
  - c. Increase the frequency and percentage of field audits of the Sub-grantee until such time that the Grantee feels that the problems/concerns have been addressed to their satisfaction.
  - d. Mandate the Sub-grantee create a plan of action to fix concerns.

If Grantee does not receive the plan of action within the required timeframe or the deficiency is not corrected, the Sub-grantee will no longer be allowed to facilitate the weatherization program for their service area.

However, if the Sub-grantee approaches the Grantee for technical assistance, the Grantee will provide assistance to the Sub-grantee so they may address the Grantee's concerns. This request for assistance must be made by the Sub-grantee in a reasonable timeframe during the allowable follow-up period. (Refer to third bullet point above)

If the Quality Control Inspector fails to inspect to the standards of the most recently approved Arizona WAP Field Guide, the Grantee Principle Investigator (Energy Specialist) will include this as a finding in the onsite sub-recipient monitoring report. Additionally, the Grantee Principle Investigator (Energy Specialist) will provide technical assistance to the Quality Control Inspector to ensure understanding of the latest approved Arizona WAP Field Guide. At the discretion of the Principle Investigator (Energy Specialist) and if warranted, the QCI may be required to re-take the Energy Auditor with QCI Micro-credential training.

## V.6 Weatherization Analysis of Effectiveness

Quality assurance is ongoing through data analysis; monitoring; technical assistance and AZWAP Network communication.

Grantee has a process to establish measurable expected outcomes through a performance-based contract with the WAP Sub-grantees. Sub-grantees are required to input data into the AZWAP database. Data includes housing types; measures installed; cost of installed measures; and pre and post energy audit diagnostics. Grantee analyzes this data on a monthly basis, which helps to determine both the training and technical assistance needs of the Sub-grantees as well as best practice installation trends across the network.

Monitoring visits help to identify what training a Sub-grantee and their contractors might need to improve the performance of the Sub-grantee and the program overall. Through monitoring activities, Grantee is able to make comparisons between the Sub-grantees for best practices, measure and installation costs, client education and other trends. Each Sub-grantee gets a minimum of one (1) annual monitoring visit with additional visits as necessary based on performance of the Sub-grantee. Monitoring visits are also used as an opportunity to provide one on one technical assistance as needed.

Constant communication with the WAP network is necessary for program effectiveness as it brings consistency and clarification of expectations, guidelines and regulations. Grantee participates in the WAP Network Peer-to-Peer meetings, which are held approximately four (4) times per year. Additionally, the Grantee uses a process for releasing Technical Bulletins to the WAP Sub-grantee network to maintain quality performance and regulatory compliance. When issues common to the network are identified during the Peer-to-Peer meeting, the Grantee is able to determine additional training needs.

ADOH has a contract in place with the Southwest Building Science Training Center (SWBSTC), an IREC accredited DOE Training Center, to track and provide training as required. The SWBSTC will provide, track, and document training needs as related to the QWP in WPN 22-4. ADOH and the SWBSTC will be working to increase the trained/skilled workforce especially in the underrepresented communities, through cooperation with the Sub-grantees and the Utility Providers through their community representatives.

ADOH is in the process of developing a new WAP database with a multitude of functions for quality assurance and data tracking/reporting. The new database will have the potential to extract demographic information, detail energy savings, record ACPU in real-time, and much more.

The AZ WAP has always been an inclusive program following federal eligibility guidelines. To maintain equality and equity in the AZ WAP, services are provided in the same manner statewide following the WAP policies and procedures detailed by DOE. Priorities are given to the most vulnerable populations as detailed in section V1.1, and unless an emergency presents itself, eligible applicants are served on a first come first served basis throughout the WAP Network.

Sub-grantees submit a monthly performance report and monthly job completion reports, which the Grantee uses as tools to determine Sub-grantee effectiveness in delivery of the WAP program.

Finally, the Grantee maintains a Policy and Procedures Handbook (currently being updated) indicating the Grantee's expectations for the performance of Sub-grantees including their client education, progress on completed units and expenditures, ability to follow DOE requirements; Field and Fiscal Monitoring reports; if concerns are found, how quickly they are addressed; and their billing practices. Sub-grantees submit quarterly progress reports as a performance review. This performance review is used on a quarterly basis to determine the Sub-grantees effectiveness in WAP.

## V.7 Health and Safety

Please see the approved PY2022 Arizona Department of Housing Weatherization Health and Safety Plan attached to the SF424 Application.

## V.8 Program Management

### V8.1 Overview and Organization

The Arizona DOE Weatherization Program is located within the Arizona Department of Housing (ADOH). In addition to DOE funds for weatherization, ADOH manages Weatherization funds awarded by DES LIHEAP Weatherization Program and Public Utility funds.

An Organization Chart showing how the office is structured is attached to the SF-424. The responsibilities of the ADOH staff implementing the WAP program are outlined in the Budget Justification attached to this plan and are as follows:

**Assistant Deputy Director of Housing and Community Development** - provides executive leadership to the program; specific programmatic and policy direction; approval of procurement transactions; oversight of Public Hearing process, planning and reporting.

**Deputy Director** - provides budget oversight, including annual budget and monthly budget reviews; oversees Human Resources, Procurement, and legal assistance to program when needed.

**Program Administrator** - supervises program staff, approves WAP contracts, recommends program and policy direction, reviews and approves Sub-grantee reimbursements.

**Weatherization Program Manager** – directs day-to-day programmatic activities, assists with staff supervision, compiles and submits reports, recommends and drafts program and policy direction, participates in audits, provides program and technical advice as needed, and assists in WAP training and curriculum development.

**Administrative Assistant** - handles clerical issues relating to the WAP contracts, including file set-up, travel arrangements, and other duties as assigned.

**Energy Specialist** - provides database review, training, technical assistance and on-site Quality Assurance monitoring of Sub-grantees.

**Weatherization Program Specialist** - prepares WAP contracts, organizes Sub-grantee reporting, processes reimbursement documentation, and conducts desk monitoring and site monitoring of Sub-grantees client, programmatic and financial files.

**Finance & Accounting Administrator** - responsible for financial and accounting functions associated with financial draws against WAP funds, approves all draws, reviews monthly financial reports, reviews budget reports, participates in audits.

**Accountant** - responsible for the day-to-day accounting draws associated with WAP funds, submits draws for approval, compiles monthly financial/budget reports, and participates in audits.

### **Mission**

The mission statement of the Weatherization Assistance Program is “To reduce energy costs for low-income families, particularly for the elderly, people with disabilities, families with children, and for families with a high energy burden by improving the energy efficiency of their homes while ensuring their health and safety.”

## **V8.2 Administrative Expenditure Limit**

10 CFR 440.18(e) requires that the combined amount for both Grantee and Sub-grantee administration be no more than fifteen percent (15%) of the total new funds to be awarded. However, the State Energy Efficiency Program Improvement Act of 1990 (SEEPA) Public Law 101-440, October 18, 1990, allowed an exception that supersedes the 10 CFR 440.18(e) rule, allowing up to an additional five percent (5%) of a Sub-grantee’s award be used for administration if the Sub-grantee allocation is less than \$350,000.

Arizona will retain 40% of the allowable **15% total** for administration, providing the balance 60% of the 15% Admin allocation, and apply the SEEPA allowed exception of up to an additional five percent (5%) of the Sub-grantee award to be used for administration. **The maximum administrative funding that any Sub-grantee will receive is fifteen percent (15%) of their total awarded allocation.**

## **V8.3 Monitoring Activities**

The state has a responsibility to perform monitoring and oversight of the work performed by the Sub-grantee. DOE requires the state to perform a comprehensive monitoring of each Sub-grantee annually. DOE requires five percent (5%) field inspection of completed jobs for Quality Assurance and recommends performing inspection on in-progress homes.

There are two methods of Quality Assurance:

1. For completed units where there is an Independent QCI inspector that was not involved in the job except for the Quality Control Inspections and did not perform the initial audit or any construction or installation of energy conservations measures or materials performed on the home; the Grantee principle investigator (Energy Specialist) must field monitor a minimum of five percent (5%) of the completed jobs (no less than one (1)) for Quality Assurance. The percentage of jobs to be field monitored for Quality Assurance will round up to the nearest whole number,
2. For completed units where the Auditor/QCI is an individual that performs the initial audit and develops the scope of work but is not involved with any of the construction or installation of

energy measures or materials performed on the home and this same Auditor/QCI performs the Quality Control Inspection; the Sub-grantee will be subjected to more oversight. In this scenario, the Grantee principle investigator (Energy Specialist) will field monitor a minimum of ten percent (10%) of the completed jobs (no less than two (2)) for Quality Assurance. The percentage of jobs to be field monitored for Quality Assurance will round up to the nearest whole number. Several Sub-grantees for the Arizona WAP program have a designated service provider who has QCI certified staff. The service provider will be an acceptable Auditor/QCI as long as the QCI Certified staff of the service provider did not perform any construction or installation of energy conservation measures or materials.

If the state discovers significant deficiencies (health and safety violations, poor quality installation of materials, major services missed, etc.), the state will elevate the number of completed jobs inspected to no more than 15% and will increase the frequency of visitation including review of units in progress until deficiencies are resolved.

Interim inspections will not be counted as Quality Control or Quality Assurance inspections.

The Monitors for the state and certificates held will be:

| Name             | Type of Monitor  | % Funded by DOE |
|------------------|--|-----------------|
| Travis Ekenberg  | WAP Program Manager / BPI BA Certified                             | 30%             |
| Gloria Castro    | Financial & Program Monitoring/Administrative                      | 30%             |
| Samantha Winslow | Financial & Program Monitoring Technical/BPI BA, EA, QCI Certified | 25%             |
| Kathy Blodgett   | Administrative (Business Manager)                                  | 15%             |
| TBD              | Financial & Program Monitoring/Administrative                      | 30%             |
| TBD              | Financial & Program Monitoring Technical/BPI BA, EA, QCI Certified | 25%             |
| TBD              | Financial & Program Monitoring Technical/BPI BA, EA, QCI Certified | 25%             |

ADOH receives funding from DES LIHEAP and one (1) of the state utilities to assist with the travel budget and funds for monitoring the ten-(10) weatherization Sub-grantees. Additional funding may be available from other utility partners in the future, for administrative and technological implementations to ensure the AZ WAP remains sustainable. **The budget and Plan propose the addition of two additional Technical and one additional Financial Program Monitor(s), as needed based on production and ramp up occur.**

**A. Role**

The Sub-grantees will be routinely monitored to:

1. Determine program compliance and accountability
2. Assist agencies in their program operations and compliance with DOE and state regulations
3. Analyze program performance
4. Analyze quality of work
5. Identify problems, deficiencies, and areas that need improvement and advise on how to correct
6. Analyze whether best possible program services are being delivered to low-income population
7. Assess T&TA needs
8. Improve program performance

## **B. On-Site or Virtual Monitoring**

Program and fiscal monitoring will be used to determine the program and operational effectiveness of Sub-grantees. Customer files, and Sub-grantee financial systems, records and reports will also be routinely monitored to verify the Sub-grantee's ability to prudently deliver, support, and manage installations of allowable cost effective and energy efficient measures.

On-site or virtual monitoring of Sub-grantees is performed by technical and fiscal monitoring program staff to identify methods, deficiencies, and successes in program operations and to assess technical assistance needs to develop appropriate training courses.

Inspection of completed dwelling units is done to monitor prioritization of weatherization measures, accuracy of energy audit, job costs, quality of workmanship and material, and that the work completed is reflected in the job files. Inspection of warehouse if applicable is completed to insure adequate space and security are available at reasonable costs for the material inventory. In addition, material inventory itself and condition of materials are verified.

### **B.1 On-Site or Virtual Technical**

On-site or virtual technical monitoring will be done by the Grantee's in-house Energy Specialist or a designee who has received their Quality Control Inspector certification and did not perform the Quality Control Inspection for the sub-grantee. The inspection will be of homes that have received a Quality Control Inspection by the sub-grantee's Quality Control Inspector have expended DOE funds and have been reported into the state's database as completed. Sub-grantee Quality Control Inspections will be performed by a qualified QCI Inspector who has been independent from work performed and is not a Grantee staff person.

Sub-grantees will be notified of on-site technical monitoring visits at least two weeks prior to the visit. The Grantee responsibilities related to the on-site technical monitoring event include the following:

Grantee will meet weatherization Sub-grantees in-person or virtually at least once a year for monitoring, A ten percent (10%) random sampling of Client files will be reviewed to include the following:

1. Client File Checklist (required)
2. Eligibility Determination (including the required Annual Income Calculations Form) & Client Information including hard copy evidence provided by the Sub-grantee that the client is income eligible to receive WAP services. This evidence may include, but is not limited to, third party verification from the source of income (employer, unemployment agency, social security office) of the family or source documentation for each income source listed on the application.
3. Certification of Zero Income Form (required if applicable)
4. Proof of Ownership or Signed Rental Agreement
5. Deferral Information (if applicable)
6. State Historic Preservation Documentation (if applicable)
7. Previous Weatherization Checklist (required form)
8. Clients Rights and Responsibilities Form (required form)
9. Client Complaints and Documented Resolution (if applicable)
10. Progress Form; Includes client sign-off on:
  - e. Receipt of "Client Rights and Responsibilities Form"
  - f. Client Agreement (visits for quality assurance and funder monitoring)
  - g. Receipt of Warrantees
  - h. Statement of Completion
11. Household Action Plan (required form)
12. Client Health and Safety Evaluation Forms (2)
  - c. Client use (if client so chooses)

- d. Auditor use (required form)
- 13. Work Agreement/Scope of Work
  - d. Form is supplied by Sub-grantee
  - e. Must be signed by Client
  - f. Must include any Low Cost/No Cost measures
- 14. Priority Checklist or Copy of the Energy Model with Field Waiver Request (if applicable), Health & Safety (HSD) Waiver
  - c. required if DOE/SWG HSD will exceed \$2,000
  - d. Must be approved and signed by ADOH Energy Specialist
- 15. Residential Diagnostic Evaluation Form (required form)
  - e. Initial Inspection and Diagnostics
  - f. Final Inspection and Diagnostics
  - g. Project Photos Pre-work and Post work (may be inserted into form or saved separately)
  - h. Photos of Appliances/HVAC before and after replacement (may be inserted into form or saved separately)
- 16. Quality Control Inspection Checklist (required form for DOE funded projects)
- 17. Hazard Disclosure Form; Includes client sign-off that information, notifications and release were given to them regarding:
  - d. Lead Paint
  - e. Mold Assessment and Release
  - f. Radon
- 18. Lead Safe Weatherization (if applicable)
  - c. Testing results showing no lead; or
  - d. Lead Safe Work Practices documentation per EPA requirements, Include Certified Renovator Documentation and photographs demonstrating proper practices were followed.
- 19. Materials and Labor Costs: including invoices and purchase orders (Contractor and crew based)
- 20. Bid/Equipment/Calculation/Specification Details
- 21. Inventory Sheets (if applicable)
- 22. Low-Cost/No-Cost Documentation
  - c. Cannot exceed \$250
  - d. Notations must be made in the AZWAP database indicating what the actual low cost/no cost measure was and break out the amounts by funding source used for the measure.
- 23. Landlord/Tenant Agreement (required form if applicable)
- 24. Refusal for Services, Indemnification & Waiver of Claims
- 25. Health & Safety (HSD) Waiver
  - c. Required if DOE or SWG HSD will exceed \$2,000
  - d. Must be approved and signed by ADOH Energy Specialist or WAP Staff
- 26. Sub-grantee Statement of Completion
- 27. Utility Information Release Authorization Form
- 28. Sub-grantee Contractor Oversight Form (if applicable)

Grantee will perform job site field monitoring audits on a minimum of five percent (5%) of weatherization completions for Sub-grantees using Independent QCI and 10% for Sub-grantees using Auditor/QCI (See Section V5.3 for definition). Grantee will inspect in-progress units as needed. The field monitoring will be an analysis of quality of field practices, including:

- 1. Audit procedures and compliance with audit protocols and work orders
- 2. Diagnostics
- 3. Overall effectiveness
- 4. Compliance with Arizona Success with Weatherization Field Guide
- 5. Workmanship
- 6. Thoroughness
- 7. Health and safety issues
- 8. Agency final inspection procedures
- 9. Training needs

Grantee staff will randomly select the weatherization completions to be inspected by reviewing jobs submitted in the database, unless particular jobs are deemed to require review. The Sub-grantee will be notified of the homes selected for inspection prior to the visit to allow coordination with the homeowners.

1. Grantee will use the Arizona Success with Weatherization Field Guide and/ or the Standard Work Specifications to evaluate the weatherization jobs.
2. Grantee may recommend re-works, re-inspections, and T&TA visits in response to findings.
3. Grantee will investigate legitimate customer complaints, which may result in the Sub-grantee being required to return to correct errors or omissions.
4. Grantee will note concerns about Sub-grantee operations on the inspection report.
5. Grantee will disallow costs and/or designate the Sub-grantee as high-risk and place the Sub-grantee on a Watch List in response to recurring major findings or persistent noncompliance with Arizona WAP policy.

The monitoring visit will be documented and a Field Monitoring Summary Report will be prepared and provided to the Sub-grantee within thirty (30) calendar days following the completion of the monitoring event. The summary report will serve as the written results of the on-site technical visit. The reports will be based on:

1. **Findings**—an issue that may be a violation of rules or standards and needs to be addressed.
2. **Concerns**—an issue that may not be in violation of rules or standards but needs to be addressed.
3. **Recommendations**—notation based on monitor’s experience and expertise on how to improve certain aspects of the program.

When Findings and/or Concerns are identified, Sub-grantees will be required to submit a Corrective Action Plan within thirty (30) calendar days of receipt of the Field Monitoring Summary Report. The submission must include a description of the corrective actions taken as well as a timeline for implementation of those actions. The Sub-grantees will submit their Corrective Action Plan to the ADOH WAP Energy Specialist who will review and approve the plan or require further actions to be taken.

## **B.2 On-Site or Virtual Fiscal**

In accordance with the State Plan, on-site or virtual fiscal monitoring visits are required to evaluate Sub-grantees’ general administration and program management systems at least once a year. ADOH WAP performs an annual review of the Financial Audits for all ten (10) Sub-grantees per the requirements of WPN 20-4.

Grantee will notify Sub-grantees of scheduled on-site or virtual fiscal monitoring event at least two (2) weeks prior to the appointment. The visit or virtual review typically requires a minimum of two (2) days to complete and requires frequent interaction with Sub-grantee staff.

Key issues identified during the fiscal monitoring:

1. Procurement
2. Invoicing techniques and fiscal oversight practices
3. Accurate job costing
4. Proper designation of expenses between Administration and Program Operations
5. Property records and inventory control

If a virtual fiscal monitoring will be conducted, Sub-grantees will be required to submit documentation through a secure file transfer portal that ensures the protection and privacy of individual’s information.

Following the on-site or virtual fiscal monitoring visit, a Summary of Findings Report will be prepared and typically provided to the Sub-grantee within thirty-(30) days following the completion of the monitoring event.



When Deficiencies are identified, Sub-grantees will be required to submit a Corrective Action Plan within thirty-(30) days of receipt of the Summary of Findings Report. The submission must include a description of the corrective actions taken as well as a timeline for implementation of those actions. The Sub-grantees will submit their Corrective Action Plan to the ADOH WAP Contract Specialist who will review and approve the plan or require other actions to be taken.

**C. Desktop Monitoring**

ADOH reviews Sub-grantees entries into the AZWAP database as well as monthly payment requests to determine if the Sub-grantee is meeting its goals and expenditures in compliance with expenditure schedules.

Every month, each agency will be desktop monitored through the AZWAP.org database on the completed jobs submitted for that month. The AZWAP.org database will be closed to completed jobs on the 15th of each month. Upon receipt of the Sub-grantee's request for reimbursement of expenses, 100% percent desktop review of diagnostic performance on the completed jobs will occur. Should ongoing diagnostic performance issues be identified through desk review, the ADOH Principle Investigator/Energy Specialist will increase on-site monitoring to determine training needs and refer the agency to acquire appropriate training to correct the issues found. 100% of the Sub-grantees' request for reimbursement of expenses for completed jobs will be desk monitored for eligible weatherization costs and expenditures.

The goals of desktop monitoring are:

1. Performance analysis of weatherization work in the home;
2. Review of weatherization expenditures (costs allocated to appropriate funding source);
3. Eligibility and compliance issues; and
4. Identify specific focus areas for an agency visit, including problematic jobs.

If a compliance issue occurs, Sub-grantees will be issued a desktop monitoring report that identifies items needing correction and the request for reimbursement will not be processed. The sub grantee will be given fifteen (15) days to comply with the necessary corrections. If the Sub-grantee fails to comply in the 15-day timeframe, funding may be withheld until compliance occurs. A final desk audit report will be sent to the agency after all issues have been addressed. If any of the identified issues are uncorrectable, the Sub-grantee will not be reimbursed and the unit will not be considered a completed DOE unit.

**D. Tracking**

The Grantee may, by giving reasonable written notice specifying the effective date, terminate the Sub-grantee contract for funding from this grant in whole or in part for cause, which shall include:

1. Failure, for any reason, of the Sub-grantee to fulfill in a timely and proper manner its obligation under this grant including compliance with the approved work program and attached conditions, and such statutes, executive orders, and DOE and/or Grantee directives as may become generally applicable at any time;
2. Late submission by the Sub-grantee to the Grantee of DOE reports that are incorrect or incomplete;
3. Ineffective or improper use of funds provided under this grant;
4. Suspension or termination by DOE of the grant to the state under which this grant is made, or the portion thereof delegated by this grant. The state may also assign and transfer this grant as required by DOE directives.
5. If the Sub-grantee is unable or unwilling to comply with the terms of this grant or with additional conditions as may be lawfully applied by DOE to the grant, or the state, the Sub-grantee may terminate the grant by giving fifteen (15) days written notice to the state signifying the effective date thereof. Furthermore, the residual assets and property purchased by the Sub-grantee under this grant shall be transferred at the discretion of the state to an organization which is exempt from Federal income tax as an organization described in Section 501 (c)(3) of the Internal Revenue Code (1954) or to the appropriate federal, state or local government for exclusively

public purposes. In such event, the state shall require the Sub-grantee to ensure that adequate arrangements have been made for the transfer of all property and finished or unfinished documents, data, studies, and reports purchased by the Grantee under this grant. The Sub-grantee shall be entitled to compensation for any unreimbursed expenses reasonably and necessarily incurred in satisfactory performance of the grant. Notwithstanding the above, the Sub-grantee shall not be relieved of liability to the state for damages sustained by the state by virtue of any reimbursement to the Sub-grantee for the purpose of set-off until such time as the exact amount of damages due the state is determined.

6. If the Sub-grantee is willing to relinquish all or a portion of the counties that they serve, the Sub-grantee must give at least ninety-(90) day's written notice prior to the end of the program year to the state signifying the effective date thereof. In such event, the state will notify the other Sub-grantees (CAAs, and other public and nonprofit entities) for the opportunity to manage the Weatherization Assistance Program in the said counties. Interested Sub-grantees must submit to the state within thirty-(30) days after notice by Grantee, a plan of action and budget to manage the counties up for award. Potential Sub-grantees must show experience and performance in weatherization or housing renovation activities, experience in assisting low-income persons in the area to be served, and capacity to undertake a timely and effective weatherization program. Upon selection, the state will hold a public hearing to identify the Sub-grantee(s) and amend the State Plan. Failure to relinquish prior to the ninety-(90) day deadline will result in the Agency having to maintain the grant for the remainder of current program year and will automatically make them a Sub-grantee of the next program year. Relinquishment can only occur between July 1st - February 28th.

#### **E. Analysis**

All Sub-grantees must develop and maintain fiscal and accounting procedures, which conform to both federal and state policy for grants administration. Sub-grantees must also submit monthly Financial Status Reports. In addition, Sub-grantees are governed by 2 CFR 200, which set forth principles for determining allowable costs of programs under grants, contracts, and cooperative agreements with the federal government.

The Grantee has established fiscal controls and fund accounting procedures to assure the proper disbursement of all federal funds received by the state. Additionally, the state has established procedures for monitoring the utilization of such funds by project operators.

The controls and procedures to be implemented are as follows:

The State will follow the established fiscal policies and procedures mandated by state law. To accomplish this, the State will coordinate these policies with various other branches of state government as needed. Financial areas addressed in these procedures consist of fiscal management controls, the accounting system, fund controls, personnel and payroll management, property management, procurement, and the disbursement of funds.

The financial standards set forth by the state establish an adequate accounting system with appropriate internal controls, which will safeguard assets, check the accuracy and reliability of accounting data, promote operating efficiency and encourage compliance with prescribed management policies.

#### **V8.4 Training and Technical Assistance**

After review of the ADOH WAP training policy and its compliance with 10 CFR 440 and WPN 22-4, ADOH has determined several changes to the Training and Technical Assistance Policies and Procedures should be made in order to be fully compliant with DOE requirements. DOE Monitoring indicated a lack of comprehensive training. However, after further review ADOH was able to demonstrate that comprehensive training was provided. However, the training provided was not sufficiently tracked per

DOE requirements. ADOH is currently working with the Southwest Building Science Training Center (SWBSTC) to re-organize and reinvigorate the Training and Technical Assistance Policies and Procedures to rectify this concern. SWBSTC is researching an effective tracking system for ADOH approval and the new system should be in place within the next year. Due to the COVID pandemic, in-person training has not been available or has been extremely limited however, ADOH and SWBSTC are working together to develop virtual training and individualized training opportunities where applicable.

For training purposes, ADOH in partnership with SWBSTC will conduct an Audit and Energy Model Review training class (Weatherization for Admins 102) that will result in a certificate of completion. Still under development, the course will be mandatory with refresher training every two (2) or three (3) years. All sub-grantees will be required to send at least one employee through the training along with all in house auditor staff. For Sub-grantees that use outside contractors, the contractor's employees that provide the audit service will be required to complete the training course. Sub-grantee completion of Audit and Energy Model Review training will provide the understanding and ability to effectively review audits and energy modeling to eliminate errors and omissions before the Energy Modeling is submitted to ADOH for review and/or approval by the Energy Specialist/Principle Investigator. The Auditing Training and Certification will primarily meet (Tier 2) Specific training requirements but will also include some (Tier 1) Comprehensive training curricula. ADOH anticipates the new Auditing Training and Certification will be available in the next six (6) to nine (9) months. Sub-grantees will complete the training first with their contractors to follow, provided adequate training funds are available and budgets allow. Refresher training will ensure that the Sub-grantee and Contractor weatherization practitioners are receiving the most relevant training that is up to date with changing regulations and weatherization standards. ADOH is also working in partnership with SWBSTC to develop a better Comprehensive Training policy that will better address the needs of the state, sub-grantees and weatherization contractors and will more closely align with the individual JTA's. The new policy will minimize removing contractors from the field to attend training not relevant to their specific expertise and position but still provide for JTA crossover training. A cycle of training offerings will be developed to go along with the new Comprehensive Training policy. Individual JTA training that does not cross over into other JTAs will be added into the schedule of training offerings and may also be conducted in the field following the approved IREC accredited curriculum.

ADOH current training policy was geared toward a previously more crew based weatherization program. The State now only has two (2) to three (3) Sub-grantees that provide the audit and one (1) Sub-grantee that completes audits plus the majority of the work in house. The State's remaining Sub-grantees use contractors to perform construction and installation of energy saving measures to the homes. Over the course of the next year or two (2), changes to the ADOH WAP Training and Technical Assistance Policies and Procedures will be made and will incorporate some existing training policy with new policy to ensure that Arizona WAP is in compliance with 10CFR440 and WPN 22-4. Policy will require that weatherization field staff (Sub-grantee and/or Contractor) be appropriately trained. ADOH will continue to promote Sub-grantee and Contractor attendance and participation at conferences like Energy Out West or Building Performance Association to gain knowledge of new technologies and best practices that could be incorporated into the State's Weatherization program.

Until the State's new Training and Technical Assistance Policies and Procedures are fully developed, ADOH in partnership will continue adherence to the following policies, which will be fully monitored and tracked:

T&TA activities are intended to maintain or increase the efficiency, quality and effectiveness of the Weatherization Program at all levels. Such activities shall be designed to maximize energy savings, minimize production costs, improve program management, crew and contractor quality of work, and reduce the potential for waste, fraud, abuse and mismanagement. The Grantee assesses the training

needs of its Sub-grantees through monitoring visits and state meetings; planned for one field monitoring per Sub-grantee and quarterly meetings (funds permitting). Additionally, Grantee Desk Monitoring of completed job diagnostics and energy savings may also indicate training needs. Finally, additional trainings may be identified as necessary for implementation of the approved Health and Safety Plan.

### **Methods Used to Provide Training**

1. Formal classroom
2. On-site training
3. Hands-on training
4. Certification Training
5. Virtual Training

### **Description of Activities to be undertaken:**

The ARIZONA WAP requires that the Sub-grantee and its contractors participate in weatherization related trainings that build or enhance their knowledge, skills and abilities to provide weatherization services/energy efficiency retrofits in accordance with the 10 CFR, Part 440 and guidelines set out by the U.S. Department of Energy for the Weatherization Assistance Program. Sub-grantee and Contractor Staff must not function unsupervised until certification requirements are met.

All Comprehensive training will be done at or by an IREC accredited training center or associated individual. ARIZONA WAP IREC accredited formal training is carried out at the FSL South West Building Science Training Center (SWBSTC), which is operated by FSL Home Improvements, a non-profit organization. The SWBSTC is one of the 15 U.S. Department of Energy “Legacy” weatherization-training facilities in the country. Training curricula will reflect industry-wide initiatives and program requirements and will be updated as new program requirements or industry trends are identified.

The facility provides classroom and onsite laboratory based trainings with a specific emphasis on Weatherization activities and building knowledge, skills and abilities to perform work in the weatherization program. The SWBSTC is the only training facility in Arizona to provide a Weatherization Boot Camp course. The SWBSTC staff is comprised of industry leaders with decades of technical field experience. They are often recruited to present at regional and national conference training sessions.

### **Current SWBSTC course offerings include:**

1. WAP Boot Camp – This week long course combines Energy 101, Pressure Diagnostic 101, General Thermal Performance, Residential Retrofit Application 101, and Combustion Safety course into a weeklong training course that will provide weatherization professionals with an introduction to energy principles, thermal performance, health and safety standards, LSW, auditing, pressure diagnostics, and field repair. This course also trains Health and Safety concerns as indicated in the Grantee’s Health and Safety Plan of Radon, Lead, Mold/Moisture, Electrical, Carbon Monoxide, the causes and effects of these concerns and mitigation. The WAP Boot Camp course provides a combination of classroom and hands-on instructions that will prepare candidates to perform the tasks required of weatherization technicians within the current Weatherization Program Guidelines.
2. Energy 101
3. Pressure Diagnostics 101
4. Combustion Safety
5. General Thermal Performance
6. REM design/Energy Modeling Training
7. WAP admin
8. Lead RRP Certification
9. BPI Certification for Building Analyst
10. OSHA 10/30 Certifications
11. Energy Auditor Certification

12. Installer Certification
13. Quality Control Inspector certification/re-certification
14. Success with Weatherization – Critical Details

Though SWBSTC offers these courses, training for OSHA, BPI and other necessary WAP training can be provided by any accredited provider for the required certificates.

For details on SWBCTC and courses visit the SWBSTC website at: [www.swbstc.org](http://www.swbstc.org)

Each Sub-grantee will be required to maintain training records for its employees and contractors participating in the weatherization program. The training record will list all their training courses they have attended, certifications they possess and date of expiration of those certifications. This information is expected to be updated on an annual basis and provided to Grantee. Certifications are tracked through 2 forms that are updated annually in July or at the time of monitoring and submitted by the Sub-grantees to the Grantee. These forms can be downloaded from the ADOH website at: <https://housing.az.gov/documents-links/forms/weatherization> and are as follows:

1. Employee Certification and Verification Form
2. Sub-grantee/Contractor Certification Verification Form

Arizona WAP will periodically review training performance of Sub-grantees by way of Sub-grantee self-assessment surveys, on-site monitoring and communication with SWBSTC on specific training deficiencies and needs.

### **Required Training**

#### **Sub-grantee Program Administrator(s) (New Employees to WAP)**

1. WAP Boot Camp
2. Weatherization for Admins 101, Documentation and Admin
3. Weatherization for Admins 102, Understanding Energy Audits, Data Collection, and Energy Modeling
4. Understanding Procurement
5. DOE WAP Administrative Trainings for Sub-grantees (available at: <https://wap.litmos.com>)

#### **Crew Leader**

1. Renovation, Repair and Painting Rule (RRP)
2. OSHA 30-hour training
3. Building Performance Institute (BPI) Building Analyst Certification
4. Success with Weatherization (Critical Details)
5. WAP Boot Camp

#### **Auditor and Inspectors**

1. Renovation, Repair and Painting Rule (RRP)
2. OSHA 10-hour training
3. Building Performance Institute (BPI) Building Analyst Certification
4. Success with Weatherization (Critical Details)
5. WAP Boot Camp

#### **Quality Control Inspectors**

1. Renovation, Repair and Painting Rule (RRP)
2. OSHA 30-hour training
3. Building Performance Institute (BPI) Building Analyst Certification
4. Success with Weatherization (Critical Details)

5. WAP Boot Camp
6. Quality Control Certification

### **Required- New Field Employees and/or Contractors**

#### **Within 6 months of Employment**

1. WAP Boot Camp
2. Weatherization for Admins 101 & 102 (Admin Staff as detailed above)
3. WAP Procurement, Financial, and Program Management
4. Renovation, Repair and Painting Rule (RRP)
5. OSHA 10 or 30-hour training (Depending on position held)

#### **Within 1 year of employment**

1. Combustion Safety
2. Success with Weatherization (Critical Details)

#### **Comprehensive Training (aka Tier 1)**

Comprehensive training requires all WAP workers, including contractors, to go through a comprehensive training for their specific occupation of work, i.e. Auditor, Crew Chief, and Installer, which follows a curriculum that is in line with the Job Task Analysis (JTA) for their occupation. This training will be required to be taken at a facility with a DOE approved accredited training program for the JTA being taught.

Energy modeling training classes are also currently provided through the Southwest Building Science Training Center and the first virtual class took place on November 4<sup>th</sup>, 2021 and had 35 attendees. This session was quite successful and allowed safe and easy access for individuals in remote locations.

Comprehensive training will be based on a rotating once every three-year training schedule for each JTA: Auditor, Crew Chief and Installer. The Comprehensive schedule will begin with the Auditor training in Mid Program Year 22. The following year will be Crew Chief training and finally year three will cover Installer training. Year four will rotate back to Auditor training, etc. QCI certification will occur every three years with the next required training in the fall of 2024.

#### **Specific Training (aka Tier 2)**

Specific training does not require an accredited program and is made up of both field and classroom training. Specific Training is not a pre-scheduled training. Rather, the training will be done when concerns arise during a Grantee Field monitoring, Quality Assurance visit, desk audit, internal audit, database or energy audit review, DOE monitoring or IG reports etc. If there are consistent issues, the Sub-grantees must send workers to training that will address the issues.

Arizona WAP provides Sub-grantees with T&TA funding to support attendance and participation at weatherization training events such as the HPC National and Energy OutWest weatherization conferences. It is **expected** that essential program personnel and **Sub-grantee staff holding BPI certifications** attend these conferences to stay current with new regulations, processes and technologies and obtain necessary CEU's to retain the required certifications. Arizona WAP is aware that some Sub-grantees might have travel restrictions due to budget constraints and/or the COVID Pandemic. It should be noted that funds to pay for Sub-grantee travel are provided as part of the Weatherization grant award and proper usage of these funds will be closely monitored by Arizona WAP. Sponsorships to/for these conferences may be provided to allow additional personal to attend at reduced registration rates or at no cost. ADOH may also allow for the continued success of the AZ WAP, funding of future

conferences/classes which align with the DOE training and certification requirements to ensure program sustainability in years to come and encourage an increased knowledgeable workforce.

Attendance at state-sponsored training may be required based on the importance of the topic and information to help correct program deficiencies or to ensure competence in specific areas. In such cases, Sub-grantee and delegate attendance will be required as a matter of program compliance.

### **Contractor Training**

Training of contractors is an allowable cost through T&TA funds, though any costs associated with training contractors shall be preceded with a retention agreement in exchange for the training as well as an approved T&TA Request from ADOH (when applicable). Reimbursement of labor, mileage, meals and lodging costs for contractors attending trainings is **allowable and shall follow the guidelines below:**

- As applicable, Contractor must be selected in accordance with 2 CFR 200 compliant procurement policies and procedures.
- Sub-grantees must clearly communicate how training will be paid for during procurement process so contractors know what costs to exclude and include in the bid. Training must either be included in the contractor overhead or reimbursed per the approved T&TA Plan, not both.
- Sub-grantees must clearly communicate the T&TA reimbursement policies and procedures in a binding agreement with the contractor.
- All funds used for contractor reimbursements must be from T&TA budget line item.
- Reimbursement for the time to attend training must be reasonable and based on Sub-grantee specific labor rates or other available data.
- Travel reimbursements must be based on actual costs, the GSA Per Diem Rates, or equivalent Grantee or Sub-grantee-specific policy.
- The plan should set limits and thresholds for contractor reimbursements, for example:
  - A fixed dollar amount per day of training or per training course.
  - Total dollars to a contractor firm.
  - Course or exam fees per trainee.
  - Limits on the number of exam retakes that will be reimbursed. Apply an exam retake policy consistently to Sub-grantee employees and contractors.
- All applicable pre-requisites are required to challenge the Energy Auditor and Quality Control Inspector exams.

Sub-grantees shall consider whether the term of the retention agreement aligns with the cost of training provided. Sub-grantees will be responsible to ensure their contractors are meeting the requirements for Comprehensive and Specific training. On an annual basis, Sub-grantees must provide a completed WAP Sub-grantee/Contractor Certification Verification Form to the Grantee for desk monitoring purposes to assist with determining if DOE training requirements per WPN 22-4 are being met.

Whenever possible, the term of a retention agreement shall coincide with the one-year contract (between the Agency and the Contractor) or one-year renewal period. Otherwise, the retention agreement shall be for the duration of the contract from the time the training is provided, not to exceed one year. Training, but not certification as a Lead or Asbestos Company or maintenance of any certifications, may be provided to subcontractors meeting retention requirements. Note that the retention agreement requirement does not apply to Grantee or contractor orientation sessions or when grantees provide instruction to contractors on improving technique as needed.

### **Certified Quality Control Inspectors**

Arizona Department of Housing (ADOH) Weatherization Policies and Procedures require each Sub-grantee to have a Certified Quality Control Inspector on staff or have a contractual agreement with a third party Certified QCI Inspector. There are currently two (2) third party QCI inspectors working with six (6) out of 10 of the Sub-grantees serving rural Arizona. Four (4) metropolitan Sub-grantees have a

designated service provider with QCI staff. Arizona has not experienced a reported delay in obtaining a QCI for completed DOE units. However, through a contractual agreement, ADOH has the ability to make the three Certified QCI inspectors from Foundation for Senior Living available to the Sub-grantee network should there become a backlog. This makes up to four (4) third party Certified QCI available to the Sub-grantee network.

### **Client Education**

Client education activities are highly encouraged. Sub-grantees have received technical assistance regarding client education techniques and opportunities. This is reinforced during field monitoring visits as the monitor is trained to speak with clients about various energy saving (and some non-energy savings) steps they can take such as; changing filters once a month, using CFLs or LEDs, responsible management of their thermostats, water heater temperature usage and settings, combustion appliance safety, moisture control, and lead safety. Sub-grantees are required to distribute the lead booklet, "Renovate Right" (when potential for hazard exists), and mold and moisture awareness, pamphlet "A Brief Guide to Mold, Moisture, and Your Home" to clients prior to weatherization. Client education can occur at different times throughout the process and can include distribution of client educational material at the time of application as well as one-on-one during and post weatherization work by the energy auditor and/or field crew staff. Each Sub-grantee must determine the best method of ensuring energy education is performed. Sub-grantees must have the client sign the Hazard Disclosure Form acknowledging receipt of the lead, mold and radon materials. Additionally, Sub-grantees should complete the Household Action Plan Form, have the client sign and provide a copy to the client. The Original signed form should be retained in the Client's file. The Household Action Plan Form is available from the ADOH WAP website at: <https://housing.az.gov/documents-links/forms/weatherization>.

Additionally, Arizona Utilities (APS, SRP, SWG, TEP and Unisource Energy) all use the same brochure available in English and Spanish called "Home Energy Saving Checklist". This brochure is free and available to any community partner from <https://energyassistaz.com/secure/ContactForm.aspx> and lists no cost and low cost ways to save energy and reduce utility bills.

## **V.9 Energy crisis & Disaster Plan**

The use of weatherization funds to address disaster relief activities are allowed under the following conditions:

1. The dwelling receiving services has an income eligible client/s for weatherization services
2. Dwelling must be in sound and safe condition for the occupant and workers to perform services
3. All work must meet weatherization standards
4. Scope of work must be developed from the energy audit performed on the home.
5. All policies for weatherization must be followed, i.e. client priority, income verification, testing procedures, etc.
6. Health and safety hazard eliminations are allowed only if needed to perform weatherization work
7. Usage of personnel to secure weatherization materials, tools, equipment, weatherization vehicles, or protection of weatherization files during the initial phase of the disaster response

Weatherization vehicles and/or equipment may be used for disaster relief purposes other than weatherization services, as long as WAP is reimbursed according to the 2 CFR 200.

Weatherization funds cannot be used for any activities that will not meet WAP policies and regulations, which would include but are not limited to:



1. Providing WAP personnel to assist with disaster relief recovery activities using WAP funds other than weatherization services
2. Removal of debris from dwellings that will not receive weatherization work

The average cost for disaster relief of the dwelling units cannot exceed \$6,500. Further guidance is available from WAPTAC.org website: reference: Weatherization Program Notice 12-7. Sub-grantees may also contact the Grantee with questions.