

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM**  
**STATE PLAN MASTER FILE**

**(Grant Number: \_\_\_\_\_, State: ME, Program Year: 2020)**

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## V.1 Eligibility

### V.1.1 Approach to Determining Client Eligibility

#### 1. *Definition of Income Eligibility*

Maine has chosen to use the definition of household income, as described in the Home Energy Assistance Program Rule. Incomes calculated using this definition are adjusted as needed to align with WPN 19-3: 2020 *Poverty Income Guidelines and Definition of Income*, and any related DOE guidance thereafter, to determine household energy burden and eligibility.

#### 2. *Household Eligibility Basis*

Maine has chosen the following definition of low income for the basis of eligibility for the Weatherization Assistance Program (WAP): Low income means that income in relation to household/family size 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.

#### 3. *Income Verification*

Subgrantees obtain required income documentation and verify income eligibility as part of the intake process to certify households eligible to receive fuel assistance benefits from the Department of Health and Human Services' Low-Income Home Energy Assistance Program (HEAP). Only those households whose income has been verified within the previous 12 months to be at or below 200 percent poverty level are considered for weatherization services. Subgrantees will re-verify income eligibility prior to commencing an energy audit for households whose application eligibility certification has expired.

#### 4. *Qualified Aliens*

A household may include (a) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 210 of the Immigration and Nationality Act by approval of an application and are categorized as Special Agricultural Workers (SAWS) who perform seasonal agricultural work during a specified period of time; or (b) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 245A and 210A of the Immigration and Nationality Act by approval of an application and who is aged, blind and/or disabled as defined in Section 1414 (a)(1) of the Social Security Act (Public Law 74271); or (c) Cuban or Haitian aliens as defined in Public Law 96422, Section 50I(e). Clients are considered eligible if they have a "Green Card" or show permanent residence (I-551 Alien Registration Card, Passport, I-688 Employment Authorization Card, I-766 Employment Authorization Document, I-94 with R-1 or R-2 status designation).

### V.1.2 Approach to Determining Building Eligibility

#### 1. *Eligibility/Documentation*

In order for weatherization to be completed on a unit, household members must meet one (1) of the following eligibility criteria to assure compliance with the requirements of 10 CFR 440.22:

A dwelling unit shall be eligible for weatherization assistance if it is occupied by a household that meets the eligibility for assistance under the Low Income Home Energy Assistance Act of 1981 as determined in accordance with criteria established by the Director of the Office of Management and Budget.

Prior to weatherizing entire Multi-Family housing units, a specific eligibility test will be applied. Not less than 66 percent (or 50 percent in the case of Multi-Family units of two (2) or four (4) dwelling units), must be eligible or must become eligible dwelling units within 180 days under a federal, state or local program for rehabilitating the building or making similar improvements to the building.

Subgrantee files and records contain authorized HEAP applications with income verification, *Consent Form, Proof of Ownership* and *Landlord/Tenant Agreement* (if applicable). All documents are available for review by state or federal staff as needed.

## **2. Re-weatherization Compliance**

Maine allows units previously weatherized under this part or under other federal programs prior to September 30, 1994 to receive further financial assistance for weatherization under Maine WAP. Maine requires that these units be reported separately. Each dwelling unit served must receive a completely new energy audit that takes into account any previous energy conservation improvements to the dwelling. Subgrantees are allowed to count these homes as completions for the purposes of compliance with the per-home expenditure limit in 10 CFR 440.18

The Maine State Housing Authority (Grantee) maintains available data of previously weatherized homes and assists Community Action Agencies (Subgrantees) in determining compliance with the re-weatherization requirements as requested throughout the year. For weatherization jobs completed 1994-1997 Grantee and Subgrantee rely primarily on records maintained by the Subgrantees. Weatherization jobs completed between 1998-2008 are tracked in Grantee's Central Heating Improvement Program and Weatherization Jobs SIR database. Weatherization jobs completed 2009-September 2016 are tracked Grantee's ECOS database. Weatherization jobs completed October 2016 to present are tracked in Hancock Software's HEAT Enterprise system.

## **3. Eligible Structures**

Maine defines an eligible structure as a dwelling unit, including a stationary manufactured home, stick built house, and buildings with up to four rental units. An eligible dwelling does not include a camper, or other structures designed and constructed to provide temporary living quarters.

Maine WAP, includes the following components: an individual audit for each dwelling unit; energy savings calculations based on the American Society of Heating and Refrigerating and Air Conditioning Engineers (ASHRAE) fundamentals; and a comprehensive health and safety protocol. Prior to initiating any weatherization activities, Subgrantees are required to evaluate:

- a. the physical condition of the home,
- b. the mechanical systems, and
- c. building tightness.

If homes fail to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. *See* V.1.2 Deferral Process: Maine's Deferral of Services Policy and V.5.2 Energy Audit Procedures.

## **4. Rental Units/2-4 Unit Buildings**

Maine's goal for the weatherization of single-family 2-4 unit buildings is for the low income tenants to receive a direct benefit. For the purpose of this policy, single-family properties are those with four (4) or less units, and three (3) stories or less. Grantee does not intend to weatherize multi-family properties of five (5) and more units and/or more than three (3) stories. One of the units may be occupied by the owner. Grantee, consistent with Department of Energy guidance, requires the weatherization of the entire building not just the low income units. The amount available to weatherize the entire building is equal to the maximum dollar amount that may be spent weatherizing the low income units. There are many positive outcomes that result from weatherization; tenant comfort, preservation of affordable housing, and carbon reductions to name a few. However, there is so little money compared with the need that the focus must remain on properties where the low income tenants see a direct financial benefit. 2-4 unit buildings will be prioritized similar to single unit buildings: tenants with the highest energy use and highest energy burden (as a percentage of income) will receive priority. WAP funding may be used to weatherize 2-4 unit buildings provided at least 66 percent of residents in a three (3) unit property and 50 percent in a two (2) or four (4) unit property (determined on a building-by-building basis in a multi-building property) meet WAP income guidelines.

Grantee will calculate the Multi-Family cap using the housing tenure indicated in the most recent HEAP or Comprehensive Housing Affordability Strategy data available (whichever is more favorable). For properties with more than one (1) building and a common owner, each building will be considered separately in determining whether the structure will or will not count towards the Multi-Family caps. Weatherization of building structures with one (1) unit (including single-family attached homes such as townhouses, even if part of a larger Multi-Family property, which are separated by a full ground-to-roof wall) and building structures with 2-4 units (including stacked duplexes and triple deckers) do not count towards the Multi-Family caps.

Prior to conducting the energy audit, the Subgrantee must verify the ownership of the unit/building and secure confirmation of the following:

- a. Written Permission. Secure landlord's/owner's and tenant's consent, in writing, to proceed with weatherization measures. Additionally, the landlord and tenant are required to sign a *Weatherization Rental Agreement* before the Subgrantee can proceed with weatherization. The provisions of this Agreement include:
  - i. Rent Increases: Secure landlord's/owner's and tenant's signature on a *Weatherization Rental Agreement* that prohibits an increase for twelve (12) months because of any increase in the value of the property due solely to the weatherization work.
  - ii. Sale of Property: If the property is sold within one (1) year of the completion of weatherization work, the owner may be required to reimburse the Grantee for the cost of the weatherization material installed.
- b. Tenant complaints. Customer survey cards, client phone calls, and client comments during site monitoring are tracked by Grantee. Grantee technicians, program and management staff engage with clients and Subgrantees as needed to address issues. Closure is documented in applicable Grantee databases.
- c. Undue enhancements. Grantee conducts desk reviews on weatherization jobs to confirm that no undue or excessive enhancements occurred to the value of the dwelling unit. If costs are questionable, an "Open Item Report" is issued to the Subgrantee. Dialog and documentation determines whether the cost is allowable. If not, it is removed from the DOE billing and the Grantee uses non-WAP funding.

## **5. Deferral Process**

Deferral of Services Policy: Some dwelling conditions or client circumstances may require deferral of weatherization until the issues are resolved. Documentation of all activities in the client's file is required. "Deferral" does not necessarily mean that the home will not receive weatherization services but that until the conditions are rectified, the weatherization services are temporarily postponed.

An agency or contractor may postpone weatherization services under the following conditions:

- a. A dwelling unit is vacant.
- b. A dwelling unit is for sale.
- c. A dwelling unit is scheduled for demolition.
- d. A dwelling unit is found to have serious structural problems that would make weatherization impossible or impractical.
- e. A dwelling unit is deemed by the auditor to pose a threat to the health or safety of weatherization personnel.
- f. A manufactured home is improperly installed (*for example*, with inadequate supports).
- g. A dwelling unit is uninhabitable (*for example*, a burned-out apartment).
- h. The client is uncooperative with the weatherization agency or its contracted agent, either in demanding that certain work be done and refusing higher priority work which is needed, or by being abusive to the work crew or contractor, or by being

unreasonable in allowing access to the unit. Every attempt should be made to explain the program and the benefits of the work. If this fails, work should be suspended and Grantee should be consulted.

- i. Obvious discrepancies are found between the information supplied by the client on the application and observed conditions at the time of weatherization. The agency or contractor must resolve these discrepancies before audit/weatherization work can continue.
- j. If, at any time prior to the beginning of work (work officially begins when the audit is performed), the agency or contractor determines that the client is no longer eligible, or personnel believe that circumstances may have changed, the unit shall not be weatherized until eligibility is confirmed.
- k. There are health or safety hazards that must be corrected before weatherization services may begin. In such cases, [DOE Weatherization Program Notice \(WPN\) 17-7](#), Weatherization Health and Safety Guidance, will serve as guidance in the deferral process.
- l. There are illegal drugs or illegal activities occurring on the premises.
- m. The client or owner is physically or verbally abusive to any personnel.
- n. The dwelling unit or parts thereof are being remodeled and could impact the effectiveness of the weatherization work and is not coordinated with a housing rehabilitation program.
- o. The eligible household moves from the dwelling unit where weatherization activities and services are in progress. In such a case, the agency or contractor must determine whether to complete the work, and the circumstances must be documented in the client file.
- p. One or more occupants in a dwelling have been diagnosed with a contagious disease or disease that is life-threatening to weatherization personnel.

The list above is not intended to be inclusive of all instances in which an agency or contractor may choose not to weatherize a unit.

The client will be notified in writing of the reason for deferral and corrective action needed to proceed. In such cases, the use of other existing resources such as Grantee's Home Repair Program or other non-WAP funding available through the Subgrantee will be explored. Work on a deferred unit will not commence until conditions causing deferral have been corrected. Unfortunately, there may be extreme cases where the problem is beyond the scope of the available funding and/or a case where the client/owner is not willing to cooperate. In either case the Subgrantee must determine what is in the best interest of all concerned and proceed accordingly, ensuring appropriate documentation is in the client file.

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

Definition of children: younger than six (6) years of age.

### **V.1.4 Approach to Tribal Organizations**

Maine has five federally recognized Indian Tribes and each of them participate in the HEAP and WAP: Penobscot Indian Nation; Houlton Band of Maliseets; Aroostook Band of Mic Macs; Passamaquoddy Tribe, Pleasant Point; and Passamaquoddy Tribe, Indian Township. Grantee and the Indian Tribes maintain annual Memorandums of Understanding that outline the disbursement terms of WAP funds for these Tribal Entities.

The low-income members of an Indian tribe shall receive benefits equivalent to the assistance provided to other low-income persons within Maine. Maine allocates funds to five (5) tribal organizations based upon the number of eligible HEAP clients. This has resulted in three percent of Maine's DOE grant award being allocated to the five (5) tribes. Actual administration of the weatherization programs within tribal

organizations' land is provided by Subgrantees that service areas include Counties in which Indian Tribes are located.

## V.2 Selection of Areas to Be Served

1. In the case of areas currently served by a Subgrantee established under Section 222(a)(12) of the Economic Opportunity Act of 1964, as amended, funds available under this program will be granted to that Subgrantee for the same geographic area. Any new or additional Subgrantees shall be selected at a hearing in accordance with 10 CFR Section 440.14(a), as amended, and upon the basis of the criteria set forth in 10 CFR 440.15(a), as amended.

Maine's WAP serves all counties statewide through nine (9) Subgrantees. Each Subgrantee is, in fact, a Community Action Agency or other public or non-profit entity.

The Grantee ensures that each Subgrantee is selected on the basis of public comment received during a public hearing conducted pursuant to 440.14(a) and other appropriate findings regarding:

- a. The Subgrantee's experience and performance in weatherization or housing renovation activities;
  - b. The Subgrantee's experience in assisting low-income persons in the area to be served; and
  - c. The Subgrantee's capacity to undertake a timely and effective weatherization program.
2. In selecting a Subgrantee, 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 this part or under Title II of the Economic Opportunity Act of 1964. Program effectiveness is evaluated by consideration of factors including, but not necessarily 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 work performed by the Subgrantee;
    - c. The number, qualifications, and experience of the staff members of the Subgrantee; and
    - d. The ability of the Subgrantee to secure volunteers, training participants, public service employment workers, and other federal or state training programs.
  3. In the event that a Subgrantee is unable to complete the terms of its contract, or if Grantee determines that the Subgrantee cannot fulfill its obligations under the WAP contract, Grantee will reach out to other Subgrantees to fulfill the terms of their contract and work with the Subgrantees to extend their WAP services into the territory needing service coverage. Contracts would be amended as needed to accommodate the change in service area. This process ensures that WAP services are delivered with minimal interruption to clients if this type of situation was encountered.

## V.3 Priorities for Service Delivery

Priority for weatherization services will be identified through the use of Grantee's high energy use/energy burden list, which lists HEAP eligible households and their annual energy consumption usage for heat. Households that include elderly, disabled and/or a child younger than six (6) years of age are identified from the list. This information becomes the basis for determining production targets and wait lists.

## V.4 Climatic Conditions

Maine's heating requirements vary from south to north based on the District Heating Factors for the United States. Maine's 7500 to 9800 degree day environment mandates consideration of heating needs. In order to meet the additional heating needs of those in the northern and western portions of Maine, the Grantee uses a sliding scale of allocation based on recorded Heating Degree Days (HDD).

Maine's Hancock Software Energy Audit Tool (HEAT Enterprise) accounts for localized climatic variances by using climate data from the National Oceanic and Atmospheric Administration (NOAA). Heating degree hours are calculated using state climate data associated with each Maine zip code

## V.5 Type of Weatherization Work to Be Done

### V.5.1 Technical Guides and Materials

Standards for the proper installation of materials and procedures are described in the *Maine Weatherization Standards*, the *Maine Weatherization Single-Family Field Guide* and/or the *Maine Weatherization Manufactured Housing Field Guide* (collectively referred to as Field Guides) which are located on the Grantee's website <https://www.mainehousing.org/partners/partner-type/community-agencies/maine-weatherization-programs>; printed copies are available to Subgrantees.

Measures to be performed will be prioritized in accordance with the Maine energy audit system, implemented in accordance with the standard work specifications (SWS) contained in the Field Guides and will be compliant with [WPN 15-4](#).

The *Maine Weatherization Standards* is aligned with the companion Field Guides, which embodies SWS applicable to the Maine weatherization program. While the *Maine Weatherization Standards* and the Field Guides are fully aligned, the documents are distinct. The *Maine Weatherization Standards* provides more overview and detail on overarching goals and guidance for delivery of weatherization services. The Field Guides' format provides clear quality standards for specific measures and test procedures using concise SWS language and photographs, and is well suited for direct use in the field.

Grantee has created and maintains a dedicated web portal for Subgrantees which provides electronic access to current versions to weatherization field guides, program updates, procedures manuals, standards documents, relevant client education brochures, and a link to all WAP Program Notices and Memoranda. See <http://www.mainehousing.org/partners/partner-type/community-agencies>.

Notifications of updates to program manuals or guidance are posted to the Hancock HEAT Enterprise energy audit software Home/News page. This page is maintained as a "Bulletin Board" and includes highlights of updates, implementation dates and directions to guidance as applicable. Since all users view the Home/News page on log-in, this ensures that Subgrantee field staff are apprised of and directed to the details of important updates as they are implemented.

Program updates are also introduced at monthly Subgrantee Building Technical Committee meetings and notifications are emailed to Subgrantee Housing Directors.

All Subgrantee Agreements contain the following language: "Subgrantee agrees to ensure that the standard work specifications for work quality outlined in WPN 15-4, Section 2, will be met and that all contracts with vendors will contain the same requirement." The Subgrantee's signature on the Agreement confirms that all expectations contained in the Subgrantee Agreement, Work Plan, and Budget are understood. The Subgrantee must deliver the executed Agreement, with Work Plan and Budget to the Grantee for approval before WAP funds will be disseminated.

All weatherization work is performed in accordance to DOE approved energy audit procedures and 10 CFR 440 Appendix A.

### V.5.2 Energy Audit Procedures

1. Audit Procedures and Dates Most Recently Approved by DOE
  - a. Maine Weatherization Single-Family Field Guide approved November 15, 2018
  - b. Maine Weatherization Manufactured Housing Field Guide approved January 14, 2020
  - c. Supplemental DOE Approval for Spray Foam as an Air Sealing (Infiltration) Material as well as Insulation Material – November 27, 2018
2. Maine's energy audits consists of the following components:
  - a. an individual audit for each dwelling unit,
  - b. energy savings calculations based on ASHRAE fundamentals, and
  - c. a comprehensive health and safety protocol.



3. Prior to initiating any weatherization activities, Subgrantees are required to evaluate:
  - a. the physical condition of the home,
  - b. the mechanical systems, and
  - c. building tightness.

Evaluation of the physical condition of the home and its mechanical systems is accomplished through the use of blower door tests, combustion efficiency analysis, ventilation assessment, fossil fuel appliance combustion safety testing, and moisture level evaluation. Results determine the necessity for various remedial actions, which must be accomplished prior to weatherization, as well as whether investing program dollars in the structure is appropriate.

4. Maine's health and safety procedures, as described in the *Maine Weatherization Standards* require a total assessment of the home. Briefly, and not all inclusive, the auditor is required to assess the home from basement to attic using HEAT Enterprise:
  - a. list possible pollutant sources;
  - b. record any observable pollutant indicators;
  - c. interview the client as to health problems and lifestyle;
  - d. test all combustion appliances to the degree allowed by law as to efficiency and safe operation;
  - e. perform zone pressure diagnostic testing if applicable;
  - f. determine combustion air requirements and assess the adequacy of the existing combustion air supply;
  - g. test for spillage, back-drafting, and venting capability of all combustion exhaust vents; and
  - h. check CO production of all combustion appliances.
5. Homes which fail combustion safety tests must be deferred until corrective action is taken. Homes with unvented fossil fuel heaters cannot be weatherized until such heaters are removed, except when ANSI approved and used as secondary heat only. Also, no weatherization activity which will affect the drying capability of the home may be undertaken until all necessary moisture control activities have been completed. After the weatherization measures are completed, the home must be checked again to ascertain that all combustion appliances are operating safely.

If homes fail to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. Once a deferred home becomes eligible for weatherization, any applicable energy audit assessments, such as blower door testing and combustion safety testing, must be redone to establish a new baseline for the building conditions. Documentation of all activities in the client file is required.
6. Maine standard work specifications are embodied in the Field Guides and is posted on the Grantee's website. This measures selection system applies to all types of dwelling units and is based on instrumented audits interacted with ASHRAE 62.2-2016 based calculations for energy use, actual installation and energy costs and material lifetimes to produce a savings investment ratio (SIR)-driven work order. These calculations will be conducted using HEAT Enterprise.
7. Grantee requires Subgrantees to utilize, to the degree allowed by law, diagnostic equipment including: blower doors, combustion analyzers, hygrometers, CO analyzers, digital manometers and infrared cameras. Mandated tests include blower door tests, combustion efficiency analysis, minimal ventilation assessment, fossil fuel appliance CO testing, and moisture level evaluation.

8. Maine's HEAT Enterprise uses the basic heat loss equation for conductive heat loss, (BTU/hr times area times degrees Fahrenheit over "R") taken from the *ASHRAE 62.2-2016 Fundamentals Handbook*, for pre and post weatherization energy use. Included in the calculations are heating degree day correction factors and a blower door "N" factor when necessary. The results are checked against actual consumption whenever possible (HEAP vendors are required to provide consumption data; clients are asked to provide fuel bills during the audit). As the database grows any necessary adjustments to correction factors will be made. Maine's energy audit calculates SIRs for each contemplated weatherization measure, which reflect local heating degree day figures and a heating degree day correction factor.
9. In HEAT Enterprise, material lifetimes were updated based on DOE input and are the most conservative generally accepted by the industry. Installation costs are established by using actual subcontractor and supplier bids as well as crew installation costs at each Subgrantee.
10. A SIR is calculated for each contemplated energy conservation measure (ECM). Measures are arranged in descending order of payback by HEAT Enterprise with any individual measure with a SIR of less than 1 being considered "unallowable" unless paid for with another funding source (non-DOE). It is possible for the Subgrantee to elect to do fewer measures than proposed on any given job as long as measures are accomplished in the order established by HEAT Enterprise. However, this is not the preferred practice considering that a home may only be weatherized with DOE funds once in a lifetime, unless weatherized prior to September 30, 1994.
11. Projected incidental repair costs are also calculated and added to the total cost. Incidental repair costs are capped at 15 percent of the total cost of weatherization tasks being completed (conductive + air infiltration + mechanical tasks) in a contract period. Overall calculated SIR for activities excluding health and safety must be equal to or greater than 1. Maine's audit system assigns an energy savings to air infiltration reduction as determined by reduction of the CFM50 figure from blower door testing. As there is no way to accurately predict a post weatherization CFM50 figure, Grantee may waive the SIR requirement for the aggregate of air infiltration reduction measures on a case-by-case basis if the overall payback requirement is not met by the post blower door test.
12. All weatherization work is performed in accordance to DOE approved energy audit procedures and 10 CFR 440 Appendix A.

### **V.5.3 Final Inspection**

1. Every DOE WAP unit reported as a completed unit receives a final inspection by the Subgrantee's BPI certified Quality Control Inspector (QCI), to ensure that all work meets the minimum standard work specifications as outlined in the *Maine Weatherization Field Guide* in accordance with 10 CFR 440. The QCI must complete and provide an *Inspection Completion Form* to Grantee for every completed unit, certifying that the weatherization materials and measures were properly installed in accordance with the Maine WAP standards.
2. Grantee monitors conduct desk reviews on up to 100 percent of completed jobs, based on Subgrantee performance. Grantee will only authorize payment to the Subgrantee when satisfied that all work is completed in accordance with the work quality requirements outlined in WPN 15-4, Section 1. The Subgrantee is notified of any jobs not in compliance and is required to take the steps necessary to complete the job. In addition, the Grantee will perform quality assurance reviews of at least 5 percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.
3. Subgrantee Agreements outline disciplinary action for inadequate inspection practices and as well as other duties not performed in accordance with expectations contained in the Agreement. To wit: Grantee shall notify the Subgrantee of the respects in which the Subgrantee's performance is deficient and the time period Subgrantee has to conform its performance. In the event the Subgrantee fails to correct deficiencies in its performance

within the specified time, Grantee may withhold Subgrantee's funding under the Agreement until Subgrantee is in compliance.

4. If a Subgrantee weatherizes without approved clearance and Grantee subsequently determines the project is financed/owned by a Subgrantee, or sufficient reserves are in place for the project to incur these costs, Grantee has the right to refuse to reimburse for weatherization costs incurred.

## V.6 Weatherization Analysis of Effectiveness

1. HEAT Enterprise system reports are used as tools by the Grantee to monitor Subgrantee WAP production. Additionally, the HEAT Enterprise system calculates an Energy Savings Report for each job that includes pre-R, post-R as well as annual and lifetime BTU savings for the dwelling. Grantee plans to implement the following procedures to analyze the effectiveness of weatherization projects:
  - a. Grantee reviews estimated energy savings calculations and reports produced by HEAT Enterprise, which also prioritizes all activities in all types of housing addressed by WAP.
  - b. Grantee surveys recipients of weatherization services and results are shared with Subgrantees performing the work.
  - c. Grantee's Energy and Housing Services team (EHS) communicates regularly with Subgrantee weatherization technicians through telephone, email and onsite visits.
  - d. Grantee's EHS staff participates in monthly Housing Council meetings and Building Technician Committee (BTC) meetings hosted and attended by Subgrantees directors, managers and technical staff. These meetings provide a platform to receive and solicit feedback from Subgrantees regarding technical concerns, training and other areas that may need improvement. Grantee will implement training based on need.
2. Grantee conducts up to 100 percent desk review of all jobs and provides timely feedback to Subgrantees. Grantee's State Monitor Technical Review Checklist and State Monitor Compliance Review Checklist classifies common or problematic areas of work identified during desk audits of each weatherized unit. This checklist includes specific areas of the building model which prompts the monitor to require that the audit be restated if housing characteristics were not accurately entered into the initial audit. Grantee maintains a database which tracks jobs that have issues, follows-up with the Subgrantee, and documents resolutions.

## V.7 Health and Safety

1. The primary goals for Maine WAP are to implement cost effective weatherization procedures to conserve energy and to assess and correct related health and safety hazards. Materials used for the abatement of such hazards not listed in Appendix A of 10 CFR 440 must meet all standards incorporated by reference and made a part of Part 440.
2. Subgrantees will be allowed to expend program funds for the abatement of energy related health and safety hazards up to an average of \$1,200 per unit. Grantee health and safety related costs will be charged to either the administrative or training and technical assistance cost category. It is the responsibility of Subgrantees to manage health and safety expenditures, which Subgrantees report as part of the billing process. The health and safety costs excluded from the cost effective calculations are tracked separately.
3. The cost of eliminating health and safety hazards, which is necessary before or because of installation of weatherization materials, is an allowable expense. Definitions of "minor" or allowable Health & Safety related repairs, and at what point repairs are considered beyond the scope of weatherization are included in the applicable sections of Grantee's 2020 Health and Safety Plan Template, (4.0, 7.6, 7.9, 7.14, 7.16), and are aligned with the *Maine Weatherization Standards*.
4. Maine WAP has set parameters by defining allowable minor repairs versus unallowable major repairs for potentially out-of-scope repairs such as roof, structure, moisture, electrical, and worker/client safety. This has greatly reduced the call for case-by-case considerations. However, rigors will be applied to any case-by-case consideration, including cost, Health and Safety risk, SIRs, pursuit of

- non-WAP resources, and the extent of benefits to especially vulnerable low-income households and individuals per 10 CFR 440.
5. Subgrantees are encouraged to leverage other funds whenever possible when addressing non-cost effective tested items. Problems with the dwelling unit that have no connection with weatherization activities can only be addressed with other funding sources, such as Grantee's *Lead Hazard Reduction Demonstration Grant*, or its *Home Repair Program*. Potential funding sources include, but are not limited to:
- a. Central Heating Improvement Program (CHIP)
  - b. Community Development Block Grant (CDBG)
  - c. Maine State Housing Authority programs
  - d. City or Town assistance
  - e. USDA Rural Economic Development (formerly FHA)
  - f. Housing and Urban Development (HUD)
  - g. Local church and community groups
  - h. Building Materials Bank
  - i. Habitat for Humanity
  - j. Donations from local businesses
  - k. Landlords

#### **V.7.1 Intake Procedures**

Per the *Maine Weatherization Standards*, the auditor's duties include an evaluation of available information starting with viewing the client application, interviewing the client, and assessing the dwelling. A series of tests as outlined in the *Maine Weatherization Standards Manual* and the Field Guides are performed in order to identify potential health and safety hazards as well as energy conservation opportunities. The clients sign a *WAP Consent Form* which specifies that "In consideration of any WAP services received, I have received a copy of the EPA publication [The Lead-Safe Certified Guide to Renovate Right](#) and have also been educated on weatherization and health and safety topics pertinent to my home."

#### **V.7.2 Client Education and Training**

As outlined in WPN 17-7, the auditor makes the client aware of potential hazards and provides them with appropriate instructions and educational materials. The client also receives guidance and information on energy conservation tips, both verbally and through educational materials relating to the subject(s). In addition to various brochures and manuals available to clients, education is provided as the home is being weatherized. Crews, contractors, inspectors and other qualified personnel explain various related concepts as the work progresses. Clients are encouraged to contact appropriate agencies after weatherization if they have any questions, concerns, or wish to report feedback on the conservation efforts.

#### **V.7.3 Deferral of Services Policy**

See *Deferral of Services Notice* section of this document. V.1.2

#### **V.7.4 Grantee Health and Safety Program**

Grantee health and safety related costs will be charged to either the administrative or training and technical assistance cost category. Grantee must follow all Occupational Safety and Health Administration (OSHA) safety regulations, and national, state and local codes as further described under the Agency/Contractor Safety section below.

### **V.7.5 Agency/Contractor Safety**

1. Subgrantees must comply with OSHA requirements in all weatherization activities. When contractors are employed by local agencies those contractors are expected to comply with OSHA requirements as well. The contractors' costs to comply with OSHA, as applicable, are part of their bid price. Related costs for Subgrantees to comply with OSHA requirements may be charged under section 440.18 as health and safety, tools and equipment, incidental repairs, etc.
2. Maine WAP expects the crews, contractors, and other field personnel to be able to work under conditions that do not jeopardize their own health and safety.
3. Weatherization personnel shall be properly trained in workplace safety and will be provided with necessary protective equipment by their employer. All weatherization workers must comply with EPA's Renovation, Repair and Painting Rule (RRP) and at least one (1) person on each weatherization crew (includes both subcontractor crews and Subgrantee direct hires) must be trained in Renovation, Repair and Painting (RRP).
4. Subgrantees and contractors are expected to follow the requirements of Construction Industry OSHA Safety and Health Standards (29 CFR 1926/1910).
5. Subgrantees must comply with the OSHA Hazard Communication "Right to Know Program." The program requires chemical manufacturers or importers to assess the hazards of chemicals which they produce or import. It also requires that all employers provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training. Subgrantees must follow the record keeping requirements for Occupational Injuries and Illnesses.
6. Subgrantees are responsible for maintaining agency vehicles so that they are in safe and proper operating condition.
7. Subgrantees are responsible for ensuring all work performed in client homes abides by federal, state, and local codes and regulations.
8. Grantee verifies contractor and Subgrantee compliance with OSHA 10, Safety Data Sheets (SDS), and RRP requirements as follows:
9. As part of the annual bid process, contractors are required to submit RRP certifications. Grantee reviews this documentation to ensure compliance.
10. Grantee conducts in-progress monitoring inspections to verify compliance with OSHA 1910 and 1926, RRP, and reviews/compares SDS information to actual products being installed.
11. Grantee conducts client interviews to confirm that they received SDS information prior to the installation of WAP measures.

### **V.7.6. Client Health and Safety**

1. Client health and safety is a priority for Maine WAP. Through DOE trainings, related trainings at Maine Safety Works, and field training, Maine has developed a comprehensive plan to ensure safety in energy related areas. Subgrantees are required to have the proper equipment to perform the necessary weatherization tests. Agency personnel are required to attend trainings as determined necessary. Homes constructed prior to 1978 are presumed to contain lead paint. All weatherization clients residing in homes constructed prior to 1978 will receive the EPA publication *The Lead-Safe Certified Guide to Renovate Right* prior to the commencement of any weatherization activities.
2. Maine's Community Action Agency Building Technology Committee (BTC) meets on a monthly basis to discuss all aspects of the weatherization program. The committee consists of a technical representative from each Subgrantee. Through this venue Subgrantees are continually updated with information and techniques regarding energy conservation and

health and safety issues. This system ensures that all Subgrantees are receiving the same information and creates consistency for a quality program statewide.

3. The Weatherization and CHIP programs work in unison to guarantee "A House as a System" approach when conducting an audit.
4. All Subgrantees have blower doors, digital manometers, CO testers, heating system efficiency testers, and hygrometers, as well as other test equipment. All weatherization personnel are required to be trained in energy related health and safety issues and indoor air quality problems. Testing and corrective procedures requiring special licensing on a state level will be referred to the appropriate authority.

#### **V.7.7. Health and Safety Guidance**

1. Maine uses the [Table of Issues](#) (adopted in [DOE WPN 17-7](#)) as a reference of a majority of conditions that Maine regards as hazardous. In all cases these conditions will determine the course that weatherization will take. The chart outlines the hazard, the importance of correction, if postponement of weatherization services is necessary, types of testing, and corrective procedures for each hazard. The following will be assessed and addressed, as applicable, in accordance with [WPN 17-7](#) Table of Issues:
  - a. [Air Conditioning and Heating Systems](#) - Because of Maine's high heating degree day environment, cooling needs are considered to be insignificant for Maine dwellings. Therefore, Maine climate conditions do not warrant defining at-risk occupants or the repair or replacement of air conditioning systems under DOE WAP.
  - b. [Asbestos](#) - According to the EPA's *Building Air Quality Guide*, the mere presence of asbestos in a building does not mean that the health of a building occupant is endangered. Asbestos-containing material in good condition, not damaged or disturbed, is not likely to release asbestos into the air.
  - c. [Biologicals/Mold](#)
  - d. [Building Structure and Roofing](#)
  - e. [Code Compliance](#)
  - f. [Combustion Appliances and Combustion Gases](#) - Grantee recognizes that combustion gases in homes pose the most serious hazard. As a result, Grantee has adopted a comprehensive plan to ensure safe operation of combustion appliances and to make sure that weatherization procedures do not contribute to a problem.
    - i. Per the SWS, (2.02 Combustion Safety) CO in the appliance vent, ambient CO and spillage testing must occur as part of a weatherization job. If the mandatory testing results are outside of the allowable limits, a clean, tune & evaluate (CTE) of the heating system must occur as part of a weatherization job.
    - ii. Energy auditors must comply with the rules of the Maine Fuel Board: Prior to performing a combustion safety and efficiency test, a limited energy auditor technician shall obtain the manufacturer's installation and operating instructions for the specific equipment to be tested. Energy auditors must make every effort to obtain an equipment manual on site or on line. When a manual is not obtainable the energy auditor must order a CTE by a licensed Heating Technician. This CTE must be performed prior to invoicing the job. A visual inspection, CAZ pressure test, spillage test, and ambient CO measurement must still be conducted as part of the energy audit.
2. In addition, CTEs should also be conducted as part of routine maintenance and safety practices. Subgrantees must provide in their Work Plan established internal policies that describe how CTEs will be addressed for clients of the weatherization program. Of all the by-products of fuel combustion, carbon monoxide (CO) is deadly. Maine views any ambient level of CO as potentially dangerous and will be considered a warning signal that a problem

exists. According to ASHRAE standards, the maximum allowable concentration for short term exposure is 9 ppm in residential settings.

Corrective procedures requiring special licensing will be referred to the appropriate authority.

- a. Electrical
  - b. Formaldehyde and Volatile Organic Compounds (VOCs)
  - c. Fuel Leaks
  - d. Gas Ovens/Stove Tops/Ranges – Gas cooking appliances will be assessed and addressed in accordance with SWS.
  - e. Hazardous Materials Disposal
  - f. Injury Prevention of Occupants and Weatherization Workers
  - g. Lead-based Paint
  - h. Mold and Moisture - A thorough moisture assessment of the home is done during the audit process and conditions are noted in HEAT Enterprise. The assessment process includes a client interview, visual inspection, measuring humidity levels and blower door testing. Corrective procedures include client education, eliminating/reducing source of moisture, and providing mechanical ventilation as prescribed by ASHRAE standards.
  - i. Occupant Pre-existing or Potential Health Conditions
  - j. Pests
  - k. Radon
  - l. Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers
  - m. Ventilation and Indoor Air Quality
  - n. Window and Door Replacement
  - o. Worker Safety
3. Grantee has implemented the following additional guidance:
- a. Diagnostic Equipment - Diagnostic equipment, such as blower doors, will not be used on units where such equipment could exacerbate existing problems (*e.g.*, vermiculite in open floored attics).
  - b. Spray Polyurethane - Maine must follow EPA recommendations (available online at <http://www.epa.gov/saferchoice/spray-polyurethane-foam-spf-insulation-and-how-use-it-more-safely>)

## V.8 Program Management

### V.8.1 Overview and Organization

The Maine State Housing Authority (MaineHousing), created in 1969, is Maine's housing finance agency. MaineHousing houses the State Energy Program. MaineHousing's mission statement reads, "The mission of the Maine State Housing Authority is to assist Maine people to obtain and maintain decent, safe, affordable housing and services suitable to their unique housing needs." In carrying out this mission, MaineHousing provides leadership, maximizes resources, and promotes partnerships to develop and implement sound housing policy.

Since its inception, MaineHousing has provided housing for low and very low income renters and the opportunity for low and moderate income Maine families to purchase their own homes. In the more recent past, MaineHousing has expanded its programs to meet new challenges posed by various housing needs:

people who are homeless; people with special housing needs (such as mental health consumers); the elderly; low income homeowners who cannot afford basic home repairs; and others.

The State of Maine developed the nation's first Weatherization Program in 1973 in response to the energy crisis that gripped the northeast and caused economic hardship across the country. Maine WAP became the model used in developing funding for a program in every state in the nation. The program was originally administered by the Division of Community Services, an executive department agency. It was re-assigned to MaineHousing in 1991.

By its nature, MaineHousing rarely serves its customers directly. It places a heavy reliance on its partners to deliver its programs and services to the households that it serves. These partners include real estate professionals and lenders, non-profit organizations, other government agencies (in particular, Maine Department of Economic and Community Development, and Health and Human Services) municipalities, for-profit corporations, private developers, private landlords, management corporations, and Community Action Agencies. With offices located throughout Maine, 9 of Maine's Community Action Agencies serve as Subgrantees for the DOE Weatherization and Low Income Home Energy Assistance Programs (HEAP).

In addition to WAP, MaineHousing serves as Grantee for HEAP, Central Heating Improvement Program and other home repair programs. Weatherization serves as MaineHousing's cornerstone to providing thousands of Maine homeowners and renters with funds to repair and improve their homes. CDBG and other state and federal sources of funds will be used in conjunction with WAP funds to address this home repair crisis. In addition, MaineHousing consistently designates 15 percent of its HEAP grant to weatherization and heating system repair programs.

### ***1. Review of Subgrantee Work Plans, Budgets, and Reported Results***

Grantee requires Subgrantees to provide a Work Plan and Budget for the 2020 DOE program as part of the Subgrantee Agreement. Grantee will review the Work Plan and Budget and request any updates, if necessary, for the program year. No funds will be advanced to Subgrantees until the Work Plan and Budget is reviewed and approved by Grantee.

Grantee's EHS staff will perform comparisons of Subgrantees monthly billings versus their approved budgets to identify financial or compliance variances. EHS staff will work with Subgrantees to correct/understand variances as they are identified during this process.

### ***2. Allocation of Funding to Subgrantees***

Grantee will allocate program funding to Subgrantees based on the percentage of HEAP applications approved. Grantee reserves the right to re-allocate funding among Subgrantees during the program year based on program performance and need statewide.

WAP is currently operating under a Continuing Resolution for Fiscal Year (FY) 2020. For planning purposes, until a final full year FY 2020 budget is passed and signed by the President, Grantees have been advised to develop their Grantee Plans using the same funding level as the DOE 2019 Appropriated Funds outlined in WPN 19-2. While WPN 19-2 allocations will suffice for FY 2020 planning purposes, DOE will adjust these allocations to Grantees based on final FY 2020 appropriations. Once a FY 2020 budget is passed and signed by the President, DOE will issue WPN 19-2, Program Year 2020 Grantee Allocations.

### ***3. American Consumer Satisfaction Index Survey***

In 2017, DOE WAP utilized the American Customer Satisfaction Index (ACSI) to survey Subgrantees of the WAP. This survey provided Subgrantees the opportunity to provide DOE WAP feedback on several aspects of the Program operation and helped identify opportunities for improvement.

On May 30, 2017, Grantee shared the DOE WAP Subgrantee [State-Level Report for Maine](#) with Subgrantee Housing Directors via email. Maine's highest scores were in the area of Technical Assistance, including responsiveness to technical assistance requests. Survey results also identified several areas of challenge and opportunities for improvement, including Development of the State Plan and Partnerships.



Grantee WAP management staffs attend regularly scheduled monthly meetings with Subgrantee Housing Directors. These meetings provide ongoing opportunities for Subgrantees to provide input regarding WAP implementation, including suggestions for changes and content in the annual WAP State Plan. On October 4, 2019, Grantee management joined Subgrantee Housing Directors at their Housing Council meeting to discuss Subgrantees proposed changes to the 2020 DOE State Plan, including changing the definition of children for prioritization purposes from 2 years of age and younger to younger than 6 years of age. Additionally, Subgrantees shared input concerning training topics they would like to see for Subgrantee WAP staffs and contractors. Input from this meeting has been considered and accommodated as much as possible in developing the 2020 DOE State Plan. Additionally, the Grantee has made adjustments with their monitoring protocol and tool as part of the Grantee's efforts to support Technical Service Specialists being available in-person in the field to assist Subgrantees as much as feasible.

### **V.8.2 Administrative Expenditure Limits**

Allocation of the funds for the current Program Year show all Subgrantees at five percent administration. (See Annual File - Part A) Once all Subgrantee budgets are reviewed and approved, the Grantee will file an amendment to this State Plan, reflecting actual budgeted administrative costs.

Maine WAP may allow up to an additional five percent administrative funding for Subgrantees which qualify based on the following criteria:

1. As required by federal regulations, the Subgrantees must receive less than \$350,000 for their total annual sub-granted amount.
2. Subgrantee budgets must reflect reasonably expected administrative costs for the new grant period which are in excess of the five percent. These expected costs should be based on the best information currently available.
3. The Subgrantees must have no uncorrected audit or monitoring findings regarding the allocation of costs to the DOE sub-grant for the most current period available.

Any Subgrantee meeting criteria defined in 10 CFR 440.18(d) may receive increased administrative funding, not to exceed an additional five percent (10 percent total), based on actual costs incurred. The Grantee will require the Subgrantees to submit a letter of application for additional administrative funding. This letter must address the impact on production and the need for the additional administrative funds as well as the three (3) criteria shown above.

### **V.8.3 Monitoring Activities**

#### ***1. Programmatic/Subgrantee Monitoring***

The monitoring approach under the Maine WAP is to work closely with Subgrantee personnel to ensure continued quality workmanship and to ensure adequate financial systems and procedures. Maine WAP will administer Quality Control Inspections (QCI) in accordance with SWS outlined in the Field Guides and 10 CFR 440 using both the independent QCI and independent auditor/QCI. This will enable Subgrantees with fewer staff to utilize the process. In all cases QCIs will be Subgrantee employees or hired contractors and the Grantee will perform quality assurance reviews of at least 5 percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.

Comprehensive coverage of all Subgrantee WAP activities is achieved by a combination of regularly scheduled Grantee efforts:

- a. Administrative and fiscal monitoring – annually.
- b. Onsite inspection of completed units – monthly.
- c. Client file review – monthly.
- d. Review of Subgrantee work plans, budgets, and reported results – ongoing.
- e. Review of independent Subgrantee annual audits – annually.

Grantee has developed its own monitoring tool that includes reviews of the Subgrantee Uniform Grant Guidance Audit prescribed by 2 CFR 200. Among other things, Grantee has determined that the DOE monitoring tool duplicates many financial and compliance audit requirements under 2 CFR 200 which all Subgrantees must have their independent auditors perform annually. Subgrantees are required to submit their annual independent audit report to Grantee as soon as the report is available.

## ***2. Financial Monitoring***

EHS staff will perform comprehensive administrative and fiscal monitoring of each WAP Subgrantee on an annual basis using the Compliance Review Administrative Monitoring Tool. During the annual administrative and fiscal audit, Grantee conducts a 10 percent file review of Subgrantee's production. If a significant issue is cited Grantee will expand the sample size.

The EHS Fiscal Compliance Specialist addresses the following areas of performance under DOE Weatherization:

1. Annual Financial Monitoring review
  - a. Financial/Fiscal Accountability
  - b. Uniform Grant Guidance Audit prescribed by 2 CFR 200
  - c. General ledger
  - d. Payroll/Personnel/Timecards
  - e. Vehicles and equipment purchases
  - f. Indirect rate review to make sure it is being calculated correctly
  - g. Invoicing
  - h. Record retention
  - i. Corrective action plans
  - j. Contractor payments
2. Annual Production File Review
  - a. Procurement process
  - b. Energy audits
  - c. Eligibility
  - d. Proof of ownership
  - e. In progress and final inspections
  - f. Contractor invoices
  - g. Release of liens
  - h. Scope of work
3. Each comprehensive monitoring visit includes an exit interview during which the EHS Fiscal Compliance Specialist apprises Subgrantee personnel of pertinent findings and recommended improvements, as applicable. Within 30 days of the administrative/fiscal monitoring visit, the EHS Fiscal Compliance Specialist will prepare and deliver a report to the Subgrantee summarizing these findings and requesting corrective actions. Additionally, the Fiscal Compliance Specialist will perform a six (6) month follow-up review of corrective action plans, if applicable.
4. If significant issues are identified, Grantee requires the Subgrantee to submit a corrective action plan for Grantee's review/approval. Grantee will conduct a six (6) month follow-up review to ensure the plan was executed and effective in addressing the issues.

3. *Maine Housing Monitoring Personnel*

TITLE/GROUP CATEGORY	HRS/YR	TIME %	ADMIN %	T&TA %	DESCRIPTION OF DUTIES
Fiscal Compliance Specialist	624	30.00%	30.00%	0.00%	Performs fiscal reviews of subgrantees to ensure fiscal compliance to federal rules and regulations; provides Programmatic Guidance to Sub-Grantees. Primary responsibility for field inspections and monitoring of completed weatherized units to ensure quality and compliance with program regulations. Assists in technical training and other sub-grantee administrative duties, such as bidding, contract management, and contractor relations, as needed. Provides
Technical Services Specialists #1 & #2	1,456	35.00%	5.00%	30.00 %	Programmatic Guidance to WAP Sub-grantees. Performs initial review and data entry of sub-grantee
Wx Program Officer	520	25.00%	10.00%	15.00 %	WAP program

4. *Independent QCI Monitoring*

1. QCI monitoring has three components: Desk Review, Unit Inspections, and On-site Subgrantee Monitoring Visits.
2. Grantee State Monitors conduct a minimum of 10 percent and up to 100 percent desk/file review of the completed units submitted by each Subgrantee. The percentage of desk review depends on Subgrantees' performance, which is captured on Grantee's internal tracking sheet. This practice allows the Grantee to monitor best practices, identify concerns, and select/prioritize units for onsite inspections for each Subgrantee. *State Monitor Desk Review Checklists* provide Subgrantee with the desk review results for jobs reviewed, including job deficiencies. Deficiencies are tracked by number and level of concern of reviewed jobs on Grantee's internal tracking sheet. *State Monitor Review Checklists* are made available to the Subgrantee in HEAT Enterprise. Any deficiencies identified on the checklists must be addressed in the job file before payment can be issued.
3. EHS Technical Service Specialists will perform onsite unit inspections of completed and in-progress units statewide on a monthly basis. They will inspect a minimum of five percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.
4. If significant issues are identified, the Technical Services Specialists will expand the percentage of inspected units. Technical Guides and Materials (V.5.1) establishes the criteria for inspection procedures.

5. Capture and reporting of inspection data will be accomplished using the *Maine WAP QCI Field Form*, which provides a comprehensive checklist that includes:
  - a. Assessment of auditors' pre-existing R-values and accurate building model
  - b. Evaluation of auditors' approach for each distinct area of the structure, attic, walls, basement, site specifics, etc.
  - c. Verification and evaluation of each installed measure
  - d. Combustion appliance inspection and combustion safety testing data
  - e. Blower door, pressure pan and other applicable building diagnostics data
  - f. Exhaust device cfm measurement and confirmation of correct ASHRAE ventilation requirement
  - g. Confirmation of on-site documentation required by SWS such as Insulation Certificates
  - h. Client comments, concerns and positive remarks
6. Within 30 days of the site inspection, the Grantee monitor submits a Unit Inspection Report to the Subgrantee. These reports include findings and any required corrective actions, communications with the client/owner and contractor, observations and an assessment of the auditor's performance. If a rework is ordered, the Subgrantee will have 30 days to complete the rework and notify EHS, in writing, of its completion. The Subgrantee may also contact the Director of EHS in writing during this 30-day period to appeal a rework finding. The unit will be revisited by the Director of EHS, a representative of the Maine Community Action Agency Housing Council, the Grantee monitor, and a Subgrantee representative to resolve the dispute through actual onsite observations and discussion of discrepancies.
  - a. If the rework ordered is not rescinded following this appeal process, the Subgrantee will have 30 days from the date of the appeal resolution to complete the rework.
  - b. If reworks are not completed within 30 days, and the Subgrantee has not demonstrated reasonable cause for delay, a billing adjustment will be made for the entire dwelling unit. The unit will not be reinstated until the rework has been completed.
  - c. If there are significant deficiencies identified, the Grantee monitor will increase the number of units reviewed and frequency of monitoring visits to the Subgrantee until there are assurances that all deficiencies have been resolved.
7. Subgrantees are required to submit corrective action plans when there are indications that the Subgrantee has significant compliance issues.
8. EHS Technical Service Specialists conduct multi-day focused technical monitoring at each Subgrantee office on an annual basis. This includes face-to-face meetings and interviews with Subgrantee weatherization managers, field staff and contractors to evaluate processes and training needs. A written summary of the site visit is provided to the Subgrantee within 30 days. The Subgrantee must respond to any requests, concerns or findings within 30 days.

### **5. *Independent Subgrantee Audit***

Each Subgrantee will have an audit of their financial statements and a Uniform Grant Guidance Audit prescribed by 2 CFR 200 compliance audit conducted by an independent CPA firm following the close of the Subgrantee fiscal year. These audits will comply with all regulations pertaining to

DOE WAP and will be made available to Grantee management. Grantee's Fiscal Compliance Specialist evaluates/reviews the results of these audits on an annual basis.

Subgrantee must provide written assurance that corrective action has been taken or present a plan to correct any noted deficiencies within 60 days. During and following this 60-day corrective action period, Grantee staff will offer and be available for training and technical assistance as needed by the Subgrantee.

#### **V.8.4 Training and Technical Assistance Approach and Activities**

Grantee will continue to support Subgrantees by providing training opportunities for crews and contractors, as well as providing guidance regarding the allowable use of DOE Training and Technical Assistance (T&TA) funds for training weatherization contractors, as well as Subgrantee technicians and weatherization crews.

Maine uses monitoring methods and tools to evaluate each Subgrantee's performance and develops T&TA activities to address areas in need of improvement. Maine intends to work with the approved energy audit software provider to develop expanded reporting methods to track and compare production and energy savings between Subgrantees. This enhancement of identifying training needs by comparing Subgrantees' performance will be initiated over the coming year, to be implemented when development is completed at a future date.

Grantee's WAP T&TA plan provides a variety of activities to support developing and enhancing skills of personnel at the Grantee and Subgrantee levels. The desired result of all T&TA activities is to maximize energy savings, ensure health and safety of clients and WAP personnel, minimize operating costs, improve management and administrative procedures, and prevent waste, fraud and abuse. New WAP staffs who do not have all required training and certifications needed for their positions receive necessary training as soon as possible and no more than within 6 months of being hired. WAP staffs work under supervision as needed until they have received required training and certifications.

The T&TA plan incorporates results and information made available through EHS field monitoring visits and input from Subgrantees, weatherization contractors, and WPNs. All Comprehensive Training will be conducted by Interstate Renewable Energy Council (IREC) accredited training organizations. Specific trainings will be administered by qualified personnel as needed.

##### ***1. Grantee/Subgrantee Training***

Grantee supports the professional development and training needs of Grantee and Subgrantee weatherization staff and contractors. Subgrantees are provided T&TA funds that allow them flexibility in meeting training needs for their WAP staffs and contractors.

1. **BPI (HEP) Comprehensive Training.** Grantee will coordinate and fund mandatory accredited Building Analyst (BA), Energy Auditor (EA) and Quality Control Inspector (QCI) Comprehensive Training and certification for Grantee and Subgrantee staff as required by Weatherization Program Notices.

In addition, Grantee will coordinate and fund Crew Leader (CL), and Retrofit Installer (RIT) Comprehensive Training and certification for Subgrantee crew workers and weatherization contractors as needed. Grantee makes training opportunities available annually. These Comprehensive Trainings will be provided to Maine's weatherization network to ensure continuity and best practices across the work force for weatherization contractors and Subgrantee crews performing weatherization work. IREC accredited training will align with the NREL Job Task Analysis (JTAs) for the scope of work performed by the WAP professional.

During the 2020 DOE plan year, Grantee anticipates coordinating and funding accredited trainings and testing for Grantee, Subgrantee technicians, Contractors, and Subgrantee Crew workers as detailed on Maine's 2020 DOE T&TA Planning and Reporting Template.

2. Grantee, Subgrantee and Contractor Training. Grantee will coordinate and fund training to address the top training topics/needs identified by Subgrantees including: HEAT Enterprise software, monitoring and technical best practices, WPN guidance, and training needs identified through Grantee monitoring activities. Training topics will be addressed through Comprehensive or Specific training avenues as needed.
3. National and Regional Conferences. Grantee will send Grantee staff, and encourage Subgrantee technical and fiscal personnel and weatherization contractors to attend, NASCSP and DOE approved training conferences, as well as other conferences relating to health and safety, air quality, energy audits and weatherization specific measures.
4. In-House Training. Grantee staff will provide training on-site as needed in technical and fiscal matters and to address acute deficiencies in the field such as combustion safety training, audit training, ASHRAE, etc..
5. Online Training Modules. Grantee intends to develop online training modules geared toward new staff orientations for Subgrantees and/or weatherization contractors, as well as modules focusing on technical, fiscal and overall program management to provide support for weatherization installation and standards on an as needed basis.

In compliance with WPN Notice 09-1B, Grantee requires that contractors receiving DOE T&TA funds for training events sign a retention agreement confirming that the contractor will provide weatherization services for a period of not less than the current weatherization contract period the Contractor has with the Grantee and/or Subgrantee.

All Subgrantees are required to submit a T&TA work plan with their budget for Grantee approval. These work plans will identify and address T&TA needs at Subgrantee agencies. A standard outline is provided to all Subgrantees setting forth the areas required in their work plans.

The Grantee will review the Work Plans and Budgets to determine whether the Subgrantees are complying with the outline as well as the standards stated above. The Grantee will also coordinate and provide all Subgrantees with current developments in technical procedures and DOE guidance on technical issues. Through these procedures, the Grantee will ensure consistency in the Subgrantees' procedures as well as identifying needs of individual Subgrantees. The Grantee will expend every effort, through monitoring and management activities, to ensure that Maine continues to operate a quality WAP.

In addition, Subgrantees submit semi-annual activity reports to Grantee identifying agency staff and/or contractor employees benefiting from the use of DOE T&TA funds for training.

The Housing Director of each Subgrantee will notify the Grantee and the Housing Council of any and all planned training sessions so that common needs are coordinated and duplication is avoided.

The Grantee will continue to conduct surveys of all Subgrantees and solicit input from Grantee staff to identify training needs. This information is utilized to determine which topics the Grantee and Subgrantees will schedule for trainings during this and future grant periods. The results of the survey will be shared with the Housing Council to assist with their employee and subcontractor trainings and meetings.

Maine also relies heavily on information gathered during the monitoring process to determine and prioritize training needs. There will continue to be training such as EPA Certified Lead Renovator training which requires EPA certified trainers and other specialized training as it becomes available (i.e. Maine Indoor Air Quality, Building Performance Association, etc.). Grantee is notified of these external training opportunities and informs Subgrantees/contractors of them.

Grantee tracks applicable Grantee and Subgrantee credentials to ensure maintenance of these credentials.

The effectiveness of T&TA activities is gauged by:

1. review of session evaluation forms;
2. feedback from Building Technical Committee and contractor meetings;
3. comparison of pre & post training on-site results; and
4. analysis of responses to annual Subgrantee training needs surveys.

## **2. *Client Education***

Per the *Maine Weatherization Standards*, energy auditors and inspectors are required to provide the client/owner education during all phases of the weatherization process. This includes, but is not limited to:

1. how the weatherization process will address health and safety issues;
2. explanation of energy-conserving measures that will be installed;
3. recommendations on how the client can conserve energy; and
4. explanation of required maintenance for existing equipment, including equipment calibration requirements, added equipment, or energy-saving measures.

## **V.9 Energy Crisis and Disaster Plan**

In the event that an energy crisis or disaster plan is triggered by state or federal declarations, Grantee will ensure that use of WAP funds adhere to procedures outlined in WPN 12-7.