

New Hampshire Department of Energy (NH Energy)

NH Weatherization Assistance Program (WAP)

Program Year 2023 (PY23)

July 1, 2023, through June 30, 2024

**State Plan / Application for Funding from
the US Department of Energy (DOE)**

REVISING TOWARD COMPLETION, DUE AT US DOE 05/03/23

Text in brown font indicates that PY23 re-**DRAFTING IS NOT COMPLETE.**

Text in black font is completed for PY23, ready to share with PAC (and ultimately to put into PAGE).

[In reading this draft, please remember that “annual WAP” in this document refers to the annual allocation of federal Weatherization Assistance Program dollars to NH for a one-year time period; it does not include dollars received in NH from the federal “Bi-partisan infrastructure law” (“BIL”) which are also in use in NH for WAP work and is referred to as “BIL WAP.” This NH State Plan document deals only with the “annual WAP” work for PY23.]

IV.1 [Provides a list of the Subgrantees and the planned number of job completions for each during the program year]

Using the WAP funding allocation to New Hampshire and the average cost per unit of \$8,250, the following number of job completions is anticipated at each of the Subgrantees by the end of PY23 on June 30, 2024:

Community Action Program Belknap-Merrimack Counties, Inc.	?
Community Action Partnership of Strafford County	?
Southwestern Community Services, Inc.	?
Southern New Hampshire Services, Inc.	?
Tri-County Community Action Program, Inc.	?

Total completions for the program year: **Estimated - 160**

[The above numbers will be filled in as soon as we have the budget completed – should happen prior to our PAC meeting time on Friday.]

IV.2 [Provides the estimated overall number of job completions in the state for the program year]

As stated in IV.1, New Hampshire estimates that the annual WAP allocation of PY23 federal funds to the state will contribute to completing weatherization work in 160 dwellings over the course of the program year. This is the number of dwelling units on which at least some annual WAP money is expected to be spent. Almost every job completed with annual WAP money includes funding from other sources as well, most commonly the Home Energy Assistance (HEA) program managed by New Hampshire's regulated electric and gas utilities for the NH Public Utilities Commission. Exceptions may occur when a client's dwelling unit is located in the service territory of a municipal electric company where no "system benefit charge" is collected from customers and, therefore, those customers have no access to HEA support. In these cases, the entire cost of the weatherization work on that dwelling may get charged to annual WAP due to a lack of other resources.

IV.3 Energy Savings

The method used to estimate energy savings is the DOE WAP algorithm, which is based upon national Weatherization Assistance Program evaluations to estimate energy savings per dwelling unit. This method estimates 29.3 MMBTU for total annual energy savings for each weatherized dwelling unit.

The actual total estimated savings, based on an average cost per unit of \$8,250 and a total of 160 weatherized dwelling units completed over the course of the program year is 4482.9 MMBTU.

IV.4 Funded Leveraging Activities

In PY23, New Hampshire will not be devoting any DOE funds to seeking out additional leveraged funding sources.

IV.5 [Lists the Policy Advisory Council members]

Michele is doing this.

IV.6 [Is a place for listing Hearings and Transcripts]

Brittany is doing this.

IV.7 Miscellaneous

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Allocation Formula for Distribution of Funds to Subgrantees

The establishment of a process for allocating annual WAP dollars to Subgrantees is done at the Grantee level and communicated in the State Plan. In PY23 NH Energy is using the same formula to allocate funds among the five NH Subgrantees that we have used for many years. The formula determines the base grant amount for production, the T&TA amount, the amount for administrative expenses, and the amount of “readiness” funding for the Subgrantees. “Readiness” funding was new in PY22 and is intended to reduce the number of job deferrals by covering expenses related to home improvements that cannot be supported with regular annual WAP funds.

The allocation formula includes these three variables:

- The number of certified Fuel Assistance Program (FAP, funded by LIHEAP) applications, by county, in the prior year.
- Each county’s percentage of the state’s population with incomes below 200% of the Federal Poverty Guideline (using the most recent American Community Survey estimates of individuals below the poverty line); and
- Each county’s percentage of the state’s average heating degree days (HDD) from 1981-2020

Data weights:

County percentage of total number of statewide certified FAP applications: 60%
 County poverty percentage of total state poverty population: 20%
 County average HDD percentage of the HDD average total for all counties: 20%

Example, using actual statewide data for a previous year:

Total prior year certified FAP applications:	29,791
Total population at or below 200% of designated FPG:	260,257
Total average heating degree days:	77,026

Hypothetical Subgrantee:

		Weighted average
Number of certified FAP applications: 4,500	$4,500/29,791=.15$	$.15 \times .6=.090$
Population at designated FPG: 34,000	$34,000/260,257=.13$	$.13 \times .2=.026$
County average HDD: 8,500	$8,500/77,026=.11$	$.11 \times .2=.022$

Example Total Subgrantee allocation**13.8%**

For PY23, NH Energy has chosen to distribute the PY23 annual WAP funds to our Subgrantees using last year's allocation percentages (which are the same percentages used to distribute the BIL funds, as well). We feel that the changes that would result from incorporating the updated FAP client numbers, as well as the changes to the heating degree day information, would be so slight as to be nearly unnoticeable and that proceeding with last year's allocation percentages will not appreciably benefit or impair any of the Subgrantees.

Our decision to proceed using last year's percentages results in the following PY23 allocations to NH WAP's Subgrantees:

CAP Belknap-Merrimack Counties, Inc.	16.5%
Community Action Partnership of Strafford County	8.6%
Southern New Hampshire Services, Inc.	38.7%
Southwestern Community Services, Inc.	14.9%
Tri-County Community Action Program, Inc.	21.3%
TOTAL:	100.0%

Allocation Formula Update

The numbers in the allocation formula are generally updated annually. NH Energy uses the most recent prior year's certified FAP application data, along with updated FPG population data using the most recent 5-year data from the American Community Survey. NH Energy updates Heating Degree Day data after each decennial census.

Miscellaneous Rules Regarding Allocation Management

1. After the initial allocation, NH Energy may, at any time during the program year, reduce or eliminate funding available to a Subgrantee as a result of:
 - a). Failure to meet, without adequate explanation, quarterly goals for two (2) consecutive quarters when compared to approved production schedules and budgets (specifically variances in excess of 20%).

- b). Significant and/or repeated deficiencies discovered during field inspections or Subgrantee on-site monitoring.
 - c). Repeated poor quality and/or ineffective workmanship documented but not corrected as directed.
 - d). Evidence suggesting that a Subgrantee may be operating the program without adequate safeguards to minimize the risk of inefficiencies, waste, fraud, or abuse of DOE funds; or
 - e). Failure to comply with federal or state program requirements including 10 CFR 440, 2 CFR 200 and other relevant federal, state, or program rules and regulations.
2. NH Energy may redistribute grant funds that have been retracted from a Subgrantee, and/or funds which have been determined to be in excess of NH Energy's required budget necessary to manage the program, at its discretion but within Program regulations, after the initial allocation has been made.
 3. A Subgrantee that has been fully defunded within a program year as a result of documented actions or activities that are contrary to the Program requirements may lose eligibility for future funding. In this circumstance, NH Energy may seek an alternate Subgrantee(s) to provide weatherization services in the affected areas or solicit bids from qualified contractors.
 4. In the event of a reduction in New Hampshire's PY23 federal funding, NH Energy may, after calculating Subgrantee allocations, further negotiate final funding allocations with all Subgrantees.
 5. If a Subgrantee is not funded for any portion of PY23, that Subgrantee will be considered for funding in the next program year if deficiencies have been addressed and NH Energy is satisfied that remedial measures have been implemented.

WAP "Readiness Fund" (WRF) – Guidelines, Rules, and Expectations for Management

This section of the NH WAP PY23 State Plan sets out the NH Department of Energy's expectations and rules regarding the use of money from the "Weatherization Readiness Fund" (WRF) to prepare a candidate dwelling for the installation of WAP energy conservation measures.

The purpose of WRF funds is to minimize the number of deferrals of weatherization work by addressing structural and health and safety issues in homes that are currently in the queue to be weatherized but are at risk of deferral.

WRF money was new to WAP work in PY22 and the following presentation revises and updates the guidelines and requirements under which WRF money may be used in New Hampshire, to reduce the number of dwellings for which weatherization work must be deferred, while creating a path for swift reimbursement of Subgrantees for properly implemented WRF work.

WRF dollars may be used in NH weatherization work under the following circumstances:

- When weatherization cannot take place in the subject dwelling due to the presence of one or more major structural or other deficiencies which, if fixed, would make it possible for WAP-qualified energy conservation measures to be installed safely and effectively in that home.
- When the amount of money in the Subgrantee’s WRF budget, perhaps in concert with other available non-WAP resources, is sufficient to cover the costs of properly addressing the structural or other deficiencies which, if not addressed, would require that the weatherization work be deferred at that dwelling. Subgrantees must remember that WAP dollars (both “annual” and “BIL”) and BWP dollars are not available for expenses outside of the usual WAP and BWP energy conservation measures in client homes.
- When the required follow-on WAP-supported weatherization ECM installations in that dwelling will be paid for, at least partially, with either annual WAP funding or BIL WAP funding – but both weatherization funding sources cannot be used together on the same dwelling. Either funding source may be used in conjunction with another source, such as utility program money, but the finished work must be sufficiently funded with WAP dollars, from either source, to qualify as a completed WAP job (see next bullet point).
- When units receiving WRF support are slated to result in a DOE WAP completion (either annual WAP or BIL WAP), which is defined as “A dwelling on which a DOE-approved energy audit or priority list has been applied and weatherization work has been completed,” including a final inspection by a BPI-certified Quality Control Inspector.

Distribution of WRF dollars in New Hampshire will be based on the existing WAP allocation formula and the PY23 allocation percentages.

Priority selection of jobs to receive WRF support is to be made using the existing Priority Score Sheet which determines WAP priority clients. If a priority client is living in a home requiring the use of WRF dollars before weatherization can occur, then that client’s home is eligible for the expenditure of WRF dollars.

Weatherization Readiness Funds are allocated to each subgrantee for allowable use at their discretion. The funds may be used in combination with either the annual or BIL grant programs (but never in combination with both on the same dwelling). It is the responsibility of the subgrantee to accurately track the expenditure of WRFs across the two programs, which are then reported separately to NHDOE.

Subgrantees must track their expenditure of WRF dollars on a monthly basis and will be expected to prepare an annual summary of the PY23 use of WRF by July 31, 2024, in time for the NH WAP office to include that tracking data in the annual “T&TA, Monitoring, and Leveraging Report” which must be submitted to US DOE.

Monitoring Subgrantee use of WRF dollars will occur as part of the annual WAP monitoring process conducted by the NH Department of Energy’s WAP Office. Monitoring will seek to ensure that the funds are expended in accordance the NH WAP State Plan, and for the purposes approved by US DOE in that State Plan, resulting in completed DOE units.

In these early years of WRF availability and use, the NH WAP office is not imposing a limit on WRF expenditure at any one eligible dwelling. However, Subgrantees will be held to a limit of \$15,000 as an average of WRF expenditures in jobs over the course of the program year. The range of possible expenses necessary to bring a particular dwelling into readiness for weatherization is so large, and the

availability of WRF dollars is so limited, that the NH WAP office will continue to track WRF use as part of its regular data collection practices and will expand on the database of WRF expenses begun in PY22. The database will inform the possible revision of expenditure limitations in the future.

Subgrantees will record and track the following data points for each dwelling which benefits from the use of WRF dollars:

- Year built
- Housing type (site-built single family, manufactured, multi-family)
- Nature of repairs needed which, if not addressed, prohibit weatherization. Where applicable, identify multiple repairs or necessary remediation tasks for any single building. The following is not an exhaustive list; additional repairs may be added as needed:
 - Roof repair
 - Wall repair (interior and/or exterior)
 - Ceiling repair
 - Floor repair
 - Foundation or subspace repair
 - Exterior drainage repairs (e.g., landscaping, gutters)
 - Plumbing repairs
 - Electrical repairs
 - Clean-up or remediation beyond the typical scope of WAP:
 - Lead paint
 - Asbestos (confirmed or suspected, including vermiculite)
 - Mold and moisture
 - Other – to be specified by the Subgrantee or the Grantee
- DOE WRF expenditure per unit and building
- Leveraged fund expenditure per unit and building (i.e., funds such as LIHEAP, HUD, non-federal, etc., braided with DOE WRF to make a building weatherization ready).

As a suggestion, as Subgrantees become familiar with using WRF in NH, targeted repairs should usually be those which are as uncomplicated and efficient to complete as possible. The NH WAP office is encouraging its NH Subgrantees to consider focusing readiness funding on homes which need attention on dwelling unit elements which can be addressed by contractors already approved for, and familiar with, the special requirements of weatherization work. These might include electricians or those doing plumbing and heating work – contractors for whom no special procurement activities would be required and who could step right into a job with knowledge of the place that the work they will do has in the whole scheme of the weatherization work scope to follow. The usual WAP Quality Work Plan processes and outcomes will be expected, with the flow-down from the Field Guide and the SWS, etc., so new contractors may have some catch-up to do in order to produce acceptable results.

Use of the US DOE’s “Deferrals Classification Guide and Tracker” template is required of each NH WAP Subgrantee for the tracking of all deferrals in PY23 and to ensure that data collected aligns with anticipated reporting requirements. The NH Weatherization Technical Committee will be addressing the issue of deferrals over the course of PY23, attempting to identify and clarify the circumstances under which deferrals may be required as opposed to optional. Subgrantees are reminded that a weatherization job is to move ahead only when both the client household and the dwelling qualify.

Dwelling audits must be done thoroughly and objectively, resulting in a fact-based assessment of the dwelling's needs – needs which the auditor now knows can be addressed because of the availability of WRF support, thus reducing the occasions when reasons for deferrals are overlooked or minimized, rather than identified and presented for correction prior to weatherization.

NH WAP: Three major collaborations:

- **Home Energy Assistance (HEA) program of the NH regulated utilities**
- **NH LIHEAP**
- **Lead Hazard Control and Healthy Homes Program of the NH Housing Finance Authority**

Collaboration with utility funding: The NH Weatherization Assistance Program works in parallel with the larger low-income weatherization program managed by the state's electric and gas utilities under the supervision of the New Hampshire Public Utilities Commission. The budget for the ratepayer-funded Home Energy Assistance (HEA) program has recently been five to seven times larger than the WAP program budget and continues to grow each year. Both programs rely on New Hampshire's Community Action Agencies (our Subgrantees) for service delivery, and the Subgrantees have become expert at combining these two funding sources, and others, to maximize the number of low-income households served across the state. The two programs rely on each other; WAP funding alone would reach far fewer households than is possible by collaboration and leveraging. When a WAP-approved energy audit has been conducted on a home, and when that home has received at least one energy conservation measure paid for at least partially with WAP dollars (meaning that the energy conservation measure has met the savings to investment ratio test), then the entire job (using HEA or other dollars to complement the WAP dollars), once it has been inspected and declared complete by a BPI-certified QCI, may be considered a WAP completion.

Because NH Energy does not manage the utility-administered program or have any jurisdiction over the ratepayer funds, these leveraged funds are part of a budget entirely separate from NH Energy.

The Average Cost per Unit, however, does reflect how the program works on the ground. More than 90 percent of WAP projects have blended funding streams (WAP, HEA, and often other sources, including local funds, CDBG funds, and some LIHEAP funds transferred into weatherization work). In PY23, NH Energy is using \$8,250 as the ACPU for determining the number of homes that each of the Subgrantees will be expected to complete over the course of the year using at least some DOE funds. We estimate that by the end of PY23, using that \$8,250 average WAP cost per unit, the total number of units that will have been completed with at least some annual WAP money over the one-year period of this State Plan will be **160**. A very few of these will be projects entirely funded by WAP, typically in communities with municipal utilities which do not participate in the Home Energy Assistance program. Completing these homes with only WAP funds tends to raise the ACPU. And there are, of course, many more homes completed by the CAPs using only HEA funding.

The collaboration between annual WAP and other programs works remarkably well and ensures that the US Department of Energy's exacting quality control measures apply to far more jobs than would

be the case if Subgrantees did not combine funding streams when possible.

The collaboration between annual WAP and HEA also ensures that the spending of training and technical assistance (T&TA) money, which is available through both programs, is planned for and coordinated together as much as possible, for the benefit of Subgrantee personnel and their crews and contractors. PY23 will see a ramping up of cooperative training activities across the state and among all of the Subgrantees. HEA and WAP T&TA dollars complement each other well: HEA money is particularly valuable for training that needs to take place on relatively short notice, due to a need in the field, or to the availability of an instructor, or to some other reason that may not have been known about in time for DOE money to become involved; the spending approvals required at NH Energy tend to take longer to acquire than those sought from the utilities.

Some minor challenges arise from this collaboration, however, including “counting” the number of units completed and administering what amounts to two separate inspection and reporting structures. In PY23 NH Energy anticipates continuing the work toward obtaining a state-wide WAP management software system to address some of the coordination challenges faced in our work with the state’s utility programs, while also improving our ability to track and report on program implementation at all levels.

Collaboration with LIHEAP funding: The New Hampshire Weatherization Assistance Program also benefits from an important collaboration and leveraging of resources with the New Hampshire Fuel Assistance Program (FAP). FAP receives its funding through the Low-Income Home Energy Assistance Program (LIHEAP) which is managed nationally by the US Department of Health and Human Services (HHS). NH FAP has, for many years, annually provided funds to WAP Subgrantees for weatherization purposes. These funds were traditionally targeted at repair or replacement of residential heating systems, reducing the need to use WAP funds for those purposes. Starting in PY19, however, the uses to which LIHEAP funds transferred to WAP could be put was expanded so that heating repairs and replacements were still addressed, but the funding – called the Building Weatherization Program (BWP) – also became available to support broader, whole house, weatherization measures. Continuing in PY23, NH Energy will allocate BWP funds to NH WAP Subgrantees using the same allocation formula that determines the WAP funds distribution. NH Energy anticipates moving at least \$550,000 in FAP money into BWP work in PY23.

NH Energy’s FAP allocation for New Hampshire from the federal Department of Health and Human Services has always been needed and used almost entirely for low-income fuel assistance benefits across New Hampshire. However, NH Energy annually evaluates the possibility of using more of New Hampshire’s LIHEAP allocation to augment the Weatherization Assistance Program and its long-term improvements to low-income housing stock. DHHS rules allow states to move up to 15% of LIHEAP funding into weatherization work. For PY23, the three most likely ways in which NH WAP may benefit from NH LIHEAP dollars are:

- 1). The transfer of a standard base amount of funds from LIHEAP use to the WAP-managed Building Weatherization Program (BWP) for addressing deficiencies in all areas of low-income home energy efficiency, including especially space and water heating systems.

2). The possible additional transfer of unspent LIHEAP dollars into BWP work if the NH LIHEAP Manager determines that those dollars will be unable to be spent as FAP benefits before the close of the LIHEAP funding period.

3). WAP client eligibility screening is accomplished at the same time as FAP eligibility is assessed, so any one client is not required to undergo two screenings. WAP is entirely dependent upon FAP (LIHEAP) eligibility screening for the discovery of eligible WAP clients, which amounts to a sizable personnel and financial savings for the Subgrantee WAP budgets.

Collaboration with the Lead Hazard Control and Healthy Homes Program of the NH Housing Finance Authority (NHHFA): Midway through PY19, the NH Weatherization Assistance Program began a collaboration with the NH Housing Finance Authority’s Lead Hazard Control and Healthy Homes Program to identify dwellings which may qualify for lead hazard mitigation and removal attention. That collaboration will continue in PY22. WAP rules define and limit the type and scope of weatherization-related work which may be done on homes which contain lead hazards. The collaboration with the Lead Hazard Control and Healthy Homes Program will provide two important benefits. 1) Training support will be available for weatherization installers to ensure that they have the knowledge and certifications to safely accomplish weatherization work when lead paint is present; 2) A direct line of communication will be established between workers in the field, who may encounter buildings containing significant lead hazards, and the Agency in the state responsible for evaluating lead risk in buildings where children under 6 years of age and pregnant women reside and then informing the owner where to get information regarding mitigation and abatement services.

In addition, collaboration with NHHFA may provide access to unoccupied homes in the state where weatherization training and certification testing could be done. Currently, New Hampshire-based training for some weatherization positions is limited or unavailable due to the lack of appropriate in-state housing in which to provide the necessary training and testing to certification standards. NHHFA has offered to help with the search for appropriate homes for these purposes.

BEGINNING OF THE MASTER FILE:

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

For the purpose of determining client eligibility in the NH Weatherization Assistance Program, the definition of “low income” is as follows:

The NH Weatherization Program determines income eligibility under the Low-Income Home Energy Assistance Act of 1981 and uses the NH Fuel Assistance application to determine eligibility. Eligibility takes into consideration income and family size in accordance with criteria established by the Director of the Office of Management and Budget (OMB).

Income eligibility for the WAP program is set at a maximum of 60% of the state median income (SMI). This is a change made in NH during PY21 to make the WAP and FAP eligibility guidelines the same. 60% of SMI is higher than 200% FPG (the old NH WAP eligibility standard) and makes the administration of WAP at the local Subgrantee level easier. Other important low-income programs in New Hampshire, such as the utilities' HEA, and the Public Utilities Commission's Electric Assistance Program (EAP), also serve clients with incomes no greater than 60% SMI. The difference between these programs and WAP when the income ceiling was 200% FPG, meant that there were FAP and HEA and EAP-eligible clients served by our Subgrantees who were not eligible for WAP services because their incomes were too great. This discrepancy has now been fixed and NH WAP enters PY23 with a WAP eligibility ceiling that conforms with the other key low-income energy programs managed by our Subgrantees.

Household Eligibility:

The current WAP income guidelines are available at: [Assistance Programs Eligibility | NH Department of Energy](#)

Eligibility to receive weatherization services through the WAP is based on five (5) requirements:

1. The household's primary residence must be in New Hampshire.
2. The household income level must not exceed 60% SMI.
3. The household size must be reported accurately.
4. The physical dwelling must not have benefited from weatherization services more recently than 15 years prior to the anticipated start date for additional services.
5. The housing structure's eligibility must be evaluated and found acceptable (see section 2.5 of the NH Policies and Procedures Manual, and Section V.1.2 in this Plan).

Final determination of eligibility for the WAP does not take place until either: 1) a home energy audit has been completed by a properly credentialed Weatherization Program Energy Auditor or a Building Analyst); or 2) the home energy auditor determines from visual inspection and/or interaction with the client that a home energy audit need not be done because the house cannot be weatherized until significant improvements, beyond the scope of WAP funding, are completed, or other causes for a deferral decision are addressed (see section on deferral process below).

So, determining eligibility for weatherization takes place in two steps: first, eligibility of the client household based on the FAP application, and second, eligibility of the dwelling structure following an assessment by the Energy Auditor.

NH Population numbers: Total and those at or below 200% FPG

Based on the American Community Survey data for 2019, NH's population by county was the following:

Total population by county:

Coos County:	29,467 people
Grafton County:	83,815 people
Carroll County:	48,386 people
Sullivan County:	42,539 people
Cheshire County:	71,554 people
Belknap County:	60,639 people
Merrimack County:	144,948 people
Hillsborough County:	408,711 people
Rockingham County:	305,969 people
Strafford County:	<u>120,467 people</u>

State-wide total: 1,316,495 people

Total population living at or below the Federal poverty guideline:

For 2019, the American Community Survey identified approximately 247,658 people in New Hampshire, or approximately 19 percent of the population, who live at or below 200% of the Federal Poverty Guideline.

Ensuring Qualified Aliens are eligible for weatherization

NH Fuel Assistance applications are used for determining client eligibility for WAP. The Fuel Assistance Program (FAP) has procedures in place to ensure that Non-Qualified Aliens do not receive benefits, which ensures that WAP also complies with these requirements.

An individual with Qualified Alien status is counted as a household member when determining FAP eligibility. Income from a Non-Qualified Alien household member must be documented and included as household income, but the Non-Qualified Alien is not counted as a household member. All information must be documented in the client file by the Subgrantee.

V.1.2 Approach to Determining Building Eligibility

The Subgrantee determines when a unit is eligible for weatherization and documents that determination process in the client file.

The NH Policies and Procedures Manual (NH PPM) includes a list of the information and documents that must be maintained in the client file. This includes, but is not limited to, the client's initial application, client priority scorecard, electronic audit report, auditor's project notes, work orders, and final inspection notes and report. NH Energy's monitoring inspection of Subgrantee performance always includes a review of these client files to ensure that Subgrantees are properly determining and documenting unit eligibility.

A qualified dwelling is eligible for weatherization services if it:

- 1) Is occupied by an eligible household or will become an eligible dwelling unit within one hundred eighty (180) days under a federal, state, or local government program for rehabilitating the building or making similar improvements to the building (the 180-day rule only applies to rentals, not to owner-occupied units); and
- 2) Has not received weatherization services more recently than 15 years prior to the anticipated start date for additional work; and
- 3) Does not require deferral (deferral does not necessarily prevent the building from receiving WAP services in the future if all deferral conditions are satisfied prior to receiving WAP services).

Structures eligible for weatherization

A dwelling must be a structure, which may include a stationary manufactured home, an apartment, a group of rooms, or a single room occupied as separate living quarters, a single-family or multi-family building (including historic properties), and qualified shelters or other group facilities. The dwelling must have a physical address in New Hampshire.

Government institutions, halfway houses, nursing homes, recreational vehicles (RVs), cars, trucks, or tents are not eligible dwellings and are not eligible for weatherization services. Properties having only a commercial use are also not eligible for weatherization.

Reweathering Compliance

Generally, WAP services are provided only once for each dwelling unit. However, DOE regulations allow that units may be reweatherized under certain conditions. To be re-weatherized, a unit must meet all the criteria for “normal” weatherization: both the client and the building must be found to be eligible, a new audit must be conducted using the DOE-approved audit tool, the work plan must be implemented properly, and a final inspection by a BPI-certified Quality Control Inspector must declare the project complete. Units that are reweatherized will be counted toward the per-unit average cost but must be tracked separately from newly weatherized units.

The Consolidated Appropriations Act of 2021 amended 42 U.S. Code § 6865(c)(2) and removed the former reweatherization date, September 30, 1994, to create a “rolling” option.

Dwelling units weatherized (including dwelling units partially weatherized) under the Weatherization Assistance Program, or under other Federal programs (such as LIHEAP, HUD, or USDA), must not receive further financial assistance for weatherization until arrival of the date that is 15 years after the date on which such previous weatherization work was completed.

Previously weatherized dwelling units are not precluded from receiving some WAP assistance and services, including the provision of information and education services to assist with energy

management and evaluation of the effectiveness of installed weatherization materials, but additional weatherization energy conservation measures may not be installed in these dwellings using WAP or other federal funds until the 15-year waiting period has elapsed. Use of non-federal funds is not precluded.

In New Hampshire, the responsibility for tracking previously weatherized dwellings belongs to the Subgrantee in whose service territory the previously weatherized dwellings are located. Each Subgrantee's tracking system is slightly different, and each will need to be modified if the new requirement to also track the spending of LIHEAP, HUD, and USDA money on dwellings in those territories persists in federal law. NH Energy supports all efforts to revise the language in the federal legislation so that only WAP dollars need to be tracked by entities managing WAP allocations.

It is important to keep in mind that it is possible for a particular homeowner/renter to receive WAP services more than once inside the 15-year time frame if those services are delivered at different dwelling sites.

New Hampshire allows no more than 10% of a Subgrantee's annual production quota to include reweatherized units.

How Rental Units/Multifamily Buildings will be addressed

Subgrantees that identify multi-family buildings for weatherization should refer as many tenants as possible to the Fuel Assistance Program and encourage them to complete a FAP application. This can increase the number of eligible units in the building and maximize available funding for the weatherization work in the building.

Within the constraints of the program, a Subgrantee shall provide services to buildings that have rental dwelling units occupied by eligible program participants, or which have dwelling units that are expected to be occupied by eligible program participants within one hundred eighty (180) days of completion of the weatherization work. A Subgrantee shall weatherize the entire multi-family building when the building is eligible; individual units are not eligible for weatherization.

The owner/agent's permission to perform weatherization services must be obtained through the use of the New Hampshire WAP Landlord-Tenant Agreement prior to the start of any weatherization work (including the energy audit) on all rental property. The New Hampshire WAP Landlord-Tenant Agreement must be signed by the appropriate parties including all tenants, and copies must be retained in Subgrantee client files. The benefits of weatherization are intended for and expected to accrue primarily to the low-income tenants residing in such units. This Agreement contains a one-year rent protection feature that prohibits landlords from raising rent based on weatherization-related improvements/costs. Tenants are encouraged to contact the appropriate Subgrantee if they believe that the provision has been violated.

No undue enhancement shall occur to the value of the rental unit.

Project Approval Required for Some Multi-family Projects

Project approval from NH Energy is required when a Subgrantee intends to use DOE money to weatherize any single building that contains five or more units.

Subgrantees must submit to NH Energy a completed TREAT “.tpg” file, a narrative, and a Multi-Family Project checklist form. NH Energy will work with US DOE to determine whether weatherization services may proceed on multi-family buildings of 5 units or more. Subgrantees must receive NH Energy’s written project approval, which will be passed along from US DOE, prior to starting any weatherization work, other than the initial audit, on a multi-family project consisting of five units or more.

Mixed Eligibility

Production credit will be provided for all units weatherized within an eligible multi-family building. Units in a building with five units or more should be reported as multi-family units. Units in buildings of fewer than five units are also considered to be multi-family units but should be separately identified when reported as complete.

Weatherization eligibility is dependent upon applicant eligibility and the building structure. Whole buildings qualify for weatherization when the following occurs:

- 1) 66% or more (50% or more for two to four-unit buildings) of the dwelling units in the building are occupied by eligible applicants; or
- 2) 66% or more of the dwelling units will be occupied by eligible households within one hundred eighty (180) days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building. Subgrantees must contact NH Energy to request permission to utilize this qualification process.

Due to the building-as-a-system principle, multi-family buildings which do not submit easily to the weatherizing of individual units, due to building structure or configuration, shall not have weatherization work undertaken on individual units. Weatherization shall not occur on any multi-family building or portion of a building, including individual eligible units, if minimum building eligibility requirements are not met.

Deferral Process

The decision to defer work in a dwelling unit is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be deferred until the problem(s) creating the need for deferral are resolved and/or alternative resources are found to address the problem(s). Subgrantees should strive to work with applicants to resolve conditions where a deferral is necessary. Subgrantees should not defer service due to the presence of a hazard without pursuing reasonable options to identify other resources to address the identified hazard(s). Whenever appropriate,

educational information on how to address the hazard should be shared with the occupant. An example of educational materials is the EPA booklet “Renovate Right.”

When service is deferred, the owner or occupant must be notified in writing and should be given a reasonable timeframe to correct the problem. Examples of reasonable timeframes would be thirty (30) days for housekeeping concerns or ninety (90) days for major remodeling work, but the final determination regarding the length of time available is up to the Subgrantee in negotiation with the client. All correspondence relating to the decision to defer must be kept in the client file. On a deferred unit, pictures documenting the reason for deferral are required and must be maintained in the client file.

If a Subgrantee cannot or chooses not to weatherize a dwelling unit, the Subgrantee must, within 5 working days of this determination, notify the client and/or owner/authorized agent in writing using a descriptive letter, setting out the reason(s) for the deferral and the circumstances under which that deferral will be lifted.

Notification must be sent by certified mail. The notification must include the following information at a minimum:

- 1) The reason for the deferral and how the reason relates to the determination to not weatherize the unit.
- 2) Any corrective action required before weatherization services can be re-instated. The requirements for rectifying the deferral must be reasonable and appropriate to the severity of the situation being addressed.
- 3) A time limit for correcting problems so that weatherization services may be rescheduled. The expiration of the client’s FAP eligibility must be kept in mind when setting deadlines.
- 4) A copy of the Subgrantee’s dispute resolution procedure.

Any eligible applicant who complies fully with the requirements set out in the deferral letter shall be reinstated in the Subgrantee’s work system so weatherization work can progress as soon as reasonably possible. There is no time extension on the client’s eligibility period due to a deferral.

For PY23, New Hampshire WAP will continue to use, and will seek to improve the use of, the deferral guidance and tracking template developed by the US DOE and will maintain current tracking at each Subgrantee as well as an aggregated number at NH Energy. NH Energy will report to US DOE on the status of this deferral tracking process using whatever schedule is preferred by US DOE. A copy of the deferrals tracking template to be used in New Hampshire is attached to the SF-424.

NH Energy will identify deferral situations using the tracking template’s guidance, but generally weatherization services are likely to be deferred when:

- 1) There is a question about the reported household size.
- 2) There is a question about the reported income.
- 3) There are health and safety issues or other barriers to serving a unit which are beyond the scope of the WAP to address and which prevent or impede the proper and complete installation of weatherization measures. In rare cases, Subgrantees may complete partial

weatherization of structures where residents suffer with underlying health and safety problems, provided the work results in cost-effective energy efficiency gains.

- 4) The structural integrity of the dwelling is in a condition that prevents weatherization materials from being effectively installed.
- 5) The customer refuses to allow the installation of one or more energy conservation measures. Normally, in such instances, the auditor is able to explain the value of the measure to the customer's satisfaction and then proceed. If the customer still refuses, however, *and* the auditor determines that the customer's objections are legitimate, the auditor may direct the installation crew to skip the declined measure(s) and continue to complete the weatherization. In all such cases, the auditor must prepare a thorough summary of the reasons for the "measure skipping" and place that summary in the client file. The rationale and process must be consistent with the process defined in WPN 19-4, Attachment 8.
- 6) A building cannot be adequately weatherized with available funds. "Adequately" means all necessary and appropriate measures to make the weatherization successful without causing harm to occupants, workers, the building or other installed measures.

Deferral of Weatherization services may be appealed by the affected client using the process set out in the State of New Hampshire Weatherization Assistance Program *Policies and Procedures Manual* (Section 2.12). The appeal process is an opportunity for the client whose home has been deferred to appeal that determination, first to the Weatherization Director of the Subgrantee which deferred the weatherization services and, if unresolved at that level, the client may ask to have the decision reviewed at the NH Department of Energy level as well.

V.1.3 Definition of Children

For New Hampshire WAP work, a child is defined as anyone who has not reached his or her 19th birthday.

V.1.4 Approach to Tribal Organizations

There are no federally recognized Native American Tribes in New Hampshire. The New Hampshire Weatherization Assistance Program prohibits discrimination based on race, color, religion, sex, age, national origin, marital or familial status, sexual orientation, or physical or mental disability. Therefore, low-income members of a Native American Tribe will receive Weatherization benefits equivalent to those benefits provided to other eligible low-income persons.

V.2 Selection of areas of New Hampshire to be served

There are five Subgrantees (all are Community Action Agencies) which, together, provide weatherization and many other services to residents of all 10 counties in New Hampshire. By contracting with NH's Community Action Agencies, the New Hampshire Department of Energy (NH Energy) is able to ensure that eligible residents throughout the state are served by the Weatherization Assistance Program. The following Subgrantees cover the following counties:

- Community Action Program Belknap-Merrimack Counties, Inc. – Belknap and Merrimack Counties
- Community Action Partnership of Strafford County – Strafford County
- Southern New Hampshire Services, Inc. – Hillsborough and Rockingham Counties
- Southwestern Community Services, Inc. – Cheshire and Sullivan Counties
- Tri-County Community Action Program, Inc. – Coos, Grafton, and Carroll Counties

If a New Hampshire WAP Subgrantee is completely defunded during a Program Year, or if a Subgrantee is determined to be unqualified or is otherwise unable to continue operating the Program, NH Energy may solicit bids from eligible contractors or seek assistance from an adjacent Subgrantee to provide services to the affected service territory.

The NH CAP agencies have all been NH WAP Subgrantees for more than ten years and all are continuing into PY23 as NH WAP Subgrantees. The NH Department of Energy is pleased to have five productive and effective and experienced Subgrantees managing this Program in the field.

V.3 Priorities for Client Selection / Service Delivery

Every region in New Hampshire has a waiting list for weatherization services. And in addition to clients who have already applied for services, the number of homes and households eligible for services far exceeds even the combined funding available through the Weatherization Assistance Program and the utility-administered Home Energy Assistance (HEA) program. It is, therefore, necessary to establish defensible criteria for selecting clients who will receive weatherization services. This New Hampshire WAP State Plan continues the system of priority-setting among eligible households which has worked well for the last 9 years in New Hampshire. The PY23 Plan continues the modifications adopted in PY15 which slightly altered how Subgrantees establish priorities. These changes have been incorporated into the 2020 (the current) edition of the NH Weatherization Policies & Procedures Manual.

Subgrantees are required to use the Client Priority Scorecard – for which a point-based scoring system has been developed in compliance with federal law and DOE guidance – to determine the order in which services are delivered and to ensure that the most vulnerable households are served in a timely way. Using the Client Priority Scorecard without other biases aligns Subgrantees with the Justice40 priorities in many cases and provides diverse, equal, and inclusive access to weatherization services for all income-eligible clients.

As outlined in 10 CFR 440.16, prioritizing weatherization jobs in New Hampshire relies on the

following:

1. **Priority for Households with a High Energy Cost Burden:** The energy burden is determined by dividing the calculated heating cost shown on the FAP eligibility form by the annual income, also shown on the FAP form; if a value equal to or greater than 6% is not obtained, then recalculate including electrical utility expenses. Two (2) priority points are given when the total household energy expenditures are equal to or exceed 6% of the annual household income.
2. **Priority for Elderly:** One (1) priority point is given to households with elderly residents. Elderly is defined as age 60 or older.
3. **Priority for Persons with Disabilities:** One (1) priority point is given to households where persons with disabilities (as defined on the FAP eligibility form) reside.
4. **Priority for Children:** One (1) priority point is given to households where children under 19 years old reside.
5. **Priority for High Energy Usage:** 10 CFR 440.16 also requires that a household with high energy usage be awarded a priority point. However, based on the federal definition of a high energy user found in 10 CFR 440.3 (“*High residential energy user* means a low-income household whose residential energy *expenditure* [emphasis added] exceeds the median level of residential expenditures for all low-income households in the State”) NH Energy is not able to implement this requirement as directed. NH data which could help determine the median level of energy expenditure for all low-income households in the state are not available.

Subgrantees will generally serve households with the highest scores first. Exceptions to this priority system may occur:

- The widely cited encouragements which WAP Subgrantees receive from US DOE, both in guidance and in 10 CFR 440, to engage in leveraging of WAP funds whenever possible, can mean that the opportunity to do that leveraging is sometimes of greater importance than strictly following the scoring results provided by the priority scorecard. When NH Subgrantees are presented with the opportunity to partner WAP money cooperatively with low-income utility program money – in New Hampshire called Home Energy Assistance (HEA) – NH Energy allows its Subgrantees the flexibility to set aside the usual priority sequencing of jobs so that weatherization services can be coordinated efficiently and productively with HEA.
- The rural nature of the Subgrantees’ territories and the high cost of travel between potential job sites mean that Subgrantees may schedule production within close proximity to other WAP projects in order to achieve cost-effective scheduling of those projects, regardless of the clients’ priority score.
- An eligible household in crisis may require immediate attention making it necessary for the Subgrantee to ignore the priority job list on a temporary basis.
- When all else is equal, Subgrantees may look to additional distinguishing characteristics, such as length of time on the waiting list, as a way to determine job priority.

Subgrantees may *not* use housing type as a factor in setting priorities for service.

Several New Hampshire communities are served by municipally owned electricity utilities that do not participate in the statewide ratepayer-funded energy efficiency programs. In these areas, utility funds are not available so leveraging with utility partners is not possible. Subgrantees report that they are reluctant to place eligible homes in these communities at a scoring disadvantage simply because HEA dollars can't be used as leverage. In situations such as these, in which WAP money alone must be used without utility or other leveraging, the Subgrantee is empowered to use its judgment about exact placement of the job on the priority list.

V.4 Climatic Conditions

Climate conditions vary considerably from north to south across the state of New Hampshire. Annual Heating Degree Days (HDD) can vary from 8,300+/- in northern NH to 5,800 +/- in southern NH. HDDs are measured using a base of 65 degrees F. Climate data representing all counties was obtained at www.degreedays.net/ for the period 2018-2020. Average HDD by county is as follows:

Belknap	6981
Carroll	7518
Cheshire	6813
Coos	8362
Grafton	7046
Hillsborough	5864
Merrimack	6739
Rockingham	6169
Strafford	6508
Sullivan	7255

This results in an average of 6926 HDDs per county for New Hampshire.

The approved TREAT energy audit tool provides for thirty-year average data on climatic conditions for every hour in the calendar year for the building location chosen; or the closest weather station to the building location chosen in the audit tool.

V.5 Type of Weatherization Work to be Done

V.5.1 Technical Guides and Materials

The Weatherization Assistance Program in New Hampshire welcomed a new, 2020, edition of the New Hampshire WAP *Policies and Procedures Manual* (NH P&PM) on February 12, 2020. It remains the applicable guide for NH WAP work, generally focusing on administrative questions, and may be found here:

[Weatherization Policies and Procedures Manual \(nh.gov\)](http://www.nh.gov)

The New Hampshire *Weatherization Field Guide*, 2021 edition, was put into use in November of 2021, and will continue to govern the technical aspects of weatherization work in NH through November of 2026. Hard copies of the new Field Guide were printed and in use in the field by mid-January of 2022. Work to produce the new 2021 Edition of New Hampshire's *Weatherization Field Guide* began in PY20. NH's *Field Guide* is fully aligned with the US DOE's Standard Work Specifications (SWS). The *Field Guide* is distributed in both digital format and hard copies to all Subgrantees in quantities sufficient to meet their needs. In addition, the utilities' Home Energy Assistance (HEA) program has endorsed use of the NH *Weatherization Field Guide*, primarily for distribution to subcontractors doing work for Subgrantees in New Hampshire. Adherence to the SWS and the NH Field Guide is not as strict when utilizing HEA funding, but HEA engages the same set of Community Action Programs and their weatherization contractors to complete HEA's weatherization work as does WAP, and the Field Guide is a key element in guiding the installation of energy conservation measures.

As was begun in PY15, NH Energy's PY23 contracts with Subgrantees will specify that they must direct their contractors to use the current *Weatherization Field Guide* as instruction and guidance for field installation of energy conservation measures, and Appendix A to determine acceptable weatherization materials for work completed in New Hampshire. Our BPI-certified Quality Control Inspectors (QCI) all use the *Field Guide* as the basis for evaluating completed jobs. NH Energy will ensure compliance with the new *Field Guide* as part of its monitoring of each Subgrantee.

All Subgrantees receive DOE Weatherization Program Notices (WPNs) by direct subscription and/or distribution through NH Energy via e-mail. NH Energy also issues, on an as-needed basis, "Subgrantee Notices" to provide local guidance, and "Subgrantee Memoranda" to inform and educate, share best practices, etc.

All weatherization work is performed in accordance with the DOE-approved energy audit procedures (in NH that is TREAT) and 10 CFR 440 Appendix A. Approval has been received from DOE for using TREAT for single family homes, manufactured housing, and multi-family homes of no more than four units. That authority will expire in September of 2027. See next section, V.5.2, for discussion of the coming NH transition from using TREAT as the audit analysis tool to using its successor software, called Surveyor.

V.5.2 Energy Audit Procedures

Weatherization services for New Hampshire's low-income residents are provided and supported by essentially two programs: Home Energy Assistance (HEA) from the state's regulated utilities, and WAP, whose funding comes from the US DOE and is supplemented each year by a contribution from the state's Low Income Home Energy Assistance Program (LIHEAP) resources. HEA and WAP together utilize the same five NH Community Action Programs (CAPs) as Subgrantees to manage Program implementation in the field.

By agreement many years ago, to accommodate investment by both Programs in any single project home, and to prevent the possibility of the Subgrantees having to use two different software analysis

and modeling tools on the same dwelling, the Programs adopted use of the same audit software. HEA generously buys the licenses necessary for each CAP to operate the software for use in both Programs.

NH uses the Targeted Retrofit Energy Analysis Tool (TREAT), an electronic software program for aggregating energy audit data from single family, manufactured, and multi-family residential buildings. Once the audit data is entered in the software, the subject building can be modeled (recreated electronically) and then tested to find the most cost-effective set of energy conservation measures (ECMs) to be installed there. The result is then turned into a work plan, or scope of work, and passed along to the subcontractor or installation crew for implementation.

Approval for a WAP Grantee to use any particular electronic modeling and analysis software must be obtained by each Grantee from US DOE every five years. NH was last approved to use TREAT in 2022, so will need to submit for another review in time to have approval in-hand by September of 2027.

TREAT has been the audit software tool in NH for many years and is becoming dated and more difficult to use than its successor from the same software developer. That successor is called Surveyor and the HEA management has begun the steps necessary to move all NH Subgrantees toward the use of Surveyor over a schedule encompassing approximately the next year. Because NH WAP is eager to make the same transition at the same time, PY23 will include work with US DOE on becoming approved to use Surveyor as our energy audit tool, and work with HEA to provide training to all Subgrantees in the use of Surveyor. We intend to be ready to transition to a full use of Surveyor at the same time as HEA so that Subgrantee field work will not be complicated by the presence of two modeling software tools in use at the same time and audit work can proceed synchronized in both Programs.

NH will present US DOE with our proposed transition to Surveyor as our energy auditing and modeling software for WAP work here in the state while retaining approval to continue the use of TREAT until the utility programs are also ready to move to Surveyor (and to Surveyor's necessary tracking and reporting companion tool, called Compass). NH WAP intends to try to be ready to move to Surveyor before the utility schedule needs us to be ready, and we will seek to retain our approved use of TREAT until that time. This transition from TREAT to Surveyor has been delayed by problems with the companion software called Compass but is now thought to be coming during the second half of calendar 2023. NH WAP will move to request authority to utilize Surveyor on a schedule that will allow us to remain aligned with the utility weatherization programs.

V.5.3 Final Inspection

All weatherized units in New Hampshire must receive a final inspection by the Subgrantee. Units shall not be reported to NH Energy as complete until a satisfactory final inspection has been performed. All final inspections in PY23 must be performed by a BPI-certified Quality Control Inspector in accordance with US DOE's WPN 15-4 and its successor, WPN 20-4. As of March 15, 2016, all five NH Subgrantees had certified QCIs either on staff or among their contractors. All five Subgrantees will have access to BPI-certified QCIs for their final inspections in PY23. NH Energy is

budgeting PY23 T&TA funds to support the process of training and testing and maintaining a corps of BPI-certified QC inspectors to work in every region of the state. Additional details are in the section of this Plan on Training and Technical Assistance.

The purpose of the final inspection is to ensure that the weatherization work has been completed in a workmanlike manner, that it meets the requirements of the SWS, and that it has been done in accordance with the TREAT energy audit and the resulting work order for that particular building. A successful QC inspection is the essential next-to-final step in declaring a dwelling unit “completed” for payment purposes; in NH, the final step is a sign-off by the Subgrantee’s Weatherization Director (or equivalent title).

The final inspection must confirm the Subgrantee’s documentation of the materials installed and that those materials were installed in a professional workmanlike manner in accordance with the New Hampshire WAP standards. The Satisfaction section of the Consent to Perform Work form must be signed and dated by both the client and the Quality Control Inspector who completes the final inspection. That form then becomes a permanent part of that client’s file.

The US DOE’s Quality Work Plan (QWP) requires that Subgrantees perform final quality control inspections, using BPI-certified Quality Control Inspectors, on 100% of completed jobs and on all accessible installed measures at each job. Those inspections must ensure that all work meets the minimum specifications outlined in the SWS in accordance with 10 CFR 440. As part of NH Energy’s effort to ensure that all weatherization work completed in the state meets the standards and requirements of the SWS, NH Energy will continue the use of the following language in our PY23 Subgrantee contracts:

“Effective April 1, 2015, all work performed under the Weatherization Assistance Program (WAP) in New Hampshire, using federal money from any WAP program year, must meet the minimum specifications defined in the US Department of Energy’s “Quality Work Plan” (QWP) and the associated Standard Work Specifications (SWS). Details are presented in the Standard Work Specifications (SWS) for Home Energy Upgrades referred to in US DOE Weatherization Program Notice 15-4 and updated in Weatherization Program Notice 22-4, as well as in the New Hampshire Weatherization Assistance Program’s Field Guide, which governs how WAP energy conservation measures (ECMs) are to be implemented. The Subgrantee must ensure, and be able to document, that all staff and contractors who perform Weatherization work in PY23 are properly trained and certified for that work and have been informed that their work must meet the requirements of the SWS, or dwelling units will not be considered complete and reimbursement will not occur.”

NH Energy’s monitoring of Subgrantees in PY23 will include confirmation that this flow-down of responsibility is occurring in each Subgrantee’s territory.

In PY15 New Hampshire put in place protocols for clearly communicating to Subgrantees the expectations against which they will be measured in regard to the implementation of technical requirements for field work. Those expectations have been updated in the US DOE’s Weatherization Program Notice 22-4 and NH WAP procedures require confirmation that Subgrantees have received and are committed to implementing all technical requirements and all specifications for work which will be inspected, as set out in the New Hampshire Weatherization Field Guide, which is fully aligned

with the DOE's Standard Work Specifications (SWS), and the NH Policies and Procedures Manual. All agreements/contracts with Subgrantees, and all vendor contracts, must contain language which clearly identifies the specifications which must be met for acceptable weatherization work, and all contracts and agreements must include signatures acknowledging receipt and understanding of the expectations which must be consistently met in regard to weatherization work quality.

For PY23, the final inspection process in NH will continue to benefit from PY21 improvements in the following ways:

- Improved documentation is required of Quality Control (final) Inspectors using the revised Building Test Data Information Sheet (BTDIS), and the accompanying Narrative Assessment Form. The QC Inspector is to use the Narrative Assessment Form to provide comment on a project's more subjective expectations and attributes, as a complement to the more objective data collection placed in the BTDIS.
- The Quality Assurance Inspection (QAI), performed by a third-party contractor under the supervision of NH Energy and undertaken on 10% of all WAP completions during the program year, provides an opportunity to assess the work of the Subgrantees' Quality Control Inspectors who are required to declare when each job is actually complete. The QA inspection provides an opportunity to either confirm that the QCI performed a rigorous final inspection, or to point out areas in which the QCI could improve final inspection assessments and reporting.
- The NH WAP Policies and Procedures Manual provides an outline of the disciplinary steps to be taken when an individual Quality Control Inspector does not meet the expectations placed on him/her by the Quality Work Plan and associated guidance.
- The review and assessment of the original audit done on the dwelling is a significant part of a final quality control inspection. The review includes looking at the TREAT modeling runs that the audit produces, in order to confirm that the measures called for in the work order were appropriate and were chosen in accordance with NH audit procedures and protocols approved by US DOE. This focus on reviewing the initial audit has the added benefit of ensuring that the QC Inspector conducts the final inspection in a way that produces, in effect, a post-weatherization "audit" of what was done in the home.
- The sign-off, "job completed," procedure, required of all final QC Inspectors, is clearly set out for easy implementation on the BTDIS.

Improved procedures also cover the requirement that the client file associated with every completed weatherized dwelling unit must contain proof that the unit had a final inspection by a BPI-certified QC Inspector, and that the inspection confirmed that all installed measures met required standards and expectations for quality weatherization work. A properly filled out and annotated BTDIS, along with an accompanying Narrative Assessment Form, provides that assurance.

NH Energy Technical Field Inspections (Quality Assurance Inspections, or QAI)

Federal rules require that no less than five percent (5%) of all completed units in the state must be reviewed by NH Energy's Weatherization Technical Specialist or his/her designee. In cases where deficiencies are noted, NH Energy or its designee may, as funding allows, perform more inspections of work performed by that Subgrantee.

Starting in PY15 US DOE encouraged Subgrantees to use different individuals to conduct the home energy audit and the final inspection. Because of staffing constraints in New Hampshire, our Subgrantees must continue, in part, the practice of using the same person to complete the initial energy audit and the final inspection on any one job. As a result, NH Energy will continue in PY23 to conduct technical field inspections (Quality Assurance Inspections, or QAI) on no fewer than ten percent (10%) of all dwelling units completed in the state which meet the definition of a “WAP job” – that is, the audit and work plan were completed using the DOE-approved electronic energy auditing tool, at least one energy conservation measure passed the necessary savings-to-investment ratio (SIR) test and was installed using at least some DOE money, and the final inspection was completed by a BPI-certified Quality Control Inspector (QCI).

NH WAP technical field inspections, or Quality Assurance Inspections (QAI), include: reviewing the client file kept by the Subgrantee; reviewing the energy audit for thoroughness to be sure that all cost-effective measures were identified and properly installed; reviewing health and safety procedures; assessing cost-effectiveness of all installed measures; checking for compliance with the technical requirements of the program; and assuring adherence to New Hampshire’s weatherization standards. NH Energy’s staff or NH Energy’s QAI contractors are expected to utilize blower door testing, infrared scanning equipment, combustion efficiency and combustion safety testing equipment, digital cameras, and other equipment deemed necessary to provide comprehensive monitoring and inspection of completed units.

V.6 Weatherization Analysis of Effectiveness

The DOE Quality Work Plan (QWP) provides a means for supporting and verifying quality work in the Weatherization Assistance Program (WAP). It defines what constitutes a quality installation of weatherization measures, outlines how those measures are to be inspected and validated, and defines acceptable training and credentialing of workers. NH Energy has incorporated the standards and requirements of the Quality Work Plan into the way weatherization work is implemented and evaluated in New Hampshire.

NH Energy reviews Subgrantee job completion effectiveness during Quality Assurance Inspections (QAI) of dwelling unit weatherization projects, both in-progress and final. In PY23 NH Energy will conduct Quality Assurance Inspections on at least 10% of all annual WAP production completed in the state. Quality Assurance Inspections consider air sealing activities and the effectiveness of installed materials, paying particular attention to building air infiltration reduction through pre- and post-weatherization blower door evaluations. Verification of work, using visual inspection, blower door testing, CAZ safety testing, and the use of other technological inspection protocols and equipment, provides an important means for judging the effectiveness of on-the-job weatherization work. NH Energy utilizes the Quality Assurance Inspection process as a springboard for identifying shortcomings and deficiencies in weatherization work and then designing direct training and technical assistance activities to address those needs that are uncovered. The QAI reporting form used in New Hampshire is attached to the SF-424.

In cases where NH Energy repeatedly identifies issues, then provides corrective on-site training, and subsequently observes further and continued ineffective work, NH Energy may require more formal training for contractors, for Subgrantees, and/or for QCIs who may be overlooking deficiencies in their final inspections.

Subgrantee productivity is measured individually by comparing approved budgets and production schedules with actual expenditures and production throughout the program year.

Requiring certification and training for auditors and other weatherization team personnel ensures continued improvement of the program as individuals are required to fulfill continuing education requirements to maintain their certifications. The continuing education component of WAP work facilitates the incorporation of best practices from across the industry, providing continued improvement and upgrades for the benefit of WAP clients. NH Energy also requires formal contractor installation training, though no specific certification for installers is currently required. In PY23 and subsequent years, as WAP personnel positions turn over or people are motivated to seek improvements in weatherization knowledge, skills, and abilities, the New Hampshire program will encourage staff and contractors to undertake training in the Home Energy Professionals credential categories (see the section on Training and Technical Assistance).

New Hampshire WAP workforce recruitment and management can historically be characterized as a welcoming and open process, seeking excited and dedicated applicants, and providing professional opportunities for all participants, no matter their background, sex, sexual orientation, skin color, age, etc. But it is also true that the current emphasis on workforce diversity, equity, and inclusion has heightened the awareness of leadership at both the Grantee and Subgrantee levels in New Hampshire regarding the essential importance of being fully open to wider diversity, greater equity, and broader inclusion up and down the hiring spectrum. The increasingly intense and necessary focus on finding qualified job applicants, at all employment platform levels in the WAP, has provided an additional impetus to examine the NH WAP “culture” and to find ways to continue to enhance program diversity, equity, and inclusion. There are many examples of gender and color and age diversity in NH WAP history, but the continuing dominance of the traditional workforce composition speaks loudly about the effort that must be made now to open the program to a much more diverse array of candidates, making equity and inclusion key watchwords in hiring and retention practices of all kinds and for all positions. As with all annual WAP Grantees, the work in New Hampshire already targets 100% of annual WAP dollars at low-income disadvantaged residents, and some portion of those residents will undoubtedly live in communities designated as disadvantaged by the US DOE. But as the annual WAP funding is not directly subject to the Executive Order regarding Justice40, the annual WAP work in NH during PY23 will not be making a special effort to be sure that at least 40% of our weatherization expenditures are in those disadvantaged communities. The NH WAP work using BIL funding *will* be doing that targeting of expenditures.

NH Energy tracks Subgrantee improvement through the monitoring and inspection process. Results from current inspections and monitoring activities are compared against past reports to determine if areas of concern previously identified have been corrected. NH Energy or its designee may also review portions of the electronic audit files of particular jobs as part of either the field inspection, the on-site Subgrantee monitoring, or by desk monitoring, to assess whether auditors are accurately modeling buildings, measures, and costs. NH Energy may target monitoring and inspections and training based on prior findings.

Subgrantees not using in-house crews to perform specific work activities are to put the list of approved energy conservation measures out to public bid at least annually to provide for free and open competition among contractors seeking to provide installation services for those measures. This process may be done in conjunction with the utilities' HEA program so that contractors are assured of a consistent and equitable payment process across the statewide low-income weatherization field.

Subgrantees previously identified as having challenges in complying with program goals, requirements, and/or regulations may receive training during the program year in an effort to correct areas of deficiency. A Subgrantee identified as having deficiencies will have those areas specifically reviewed in the monitoring process to determine the effectiveness of the training received.

Other ways in which NH Energy is moving to improve program effectiveness in PY23:

- Adding two new WAP staffers using BIL funding, which will make the NH WAP office far more effective than in previous years.
- Creating a comprehensive strategic T&TA plan for the state, to benefit all Subgrantees, all contractors, and office operations at the Grantee level.
- Taking advantage of some of that newly acquired people-power to move quickly and forcefully to procure a data management computer system that will bring the management of the NH WAP work into the 21st century at both the Grantee and the Subgrantee levels.
- Seeking approval for two SERC grants in both of which we have built in some time and funding support for monitoring "realized savings" from the work installed.

V.7 Health and Safety Plan

The PY23 New Hampshire annual WAP Health and Safety Plan is attached to the SF-424 as a separate document. In PY21, we sought and received approval from US DOE to add spray foam as an insulation material to Appendix A, and our PY23 Health and Safety Plan has a section to guide safe handling and use of spray foam as an insulating material. Spray foam was previously approved for use in New Hampshire as an air sealing material.

In addition, the H&S Plan includes upgrades and re-writes of certain sections to come into compliance with the H&S requirements set out in WPN 22-7, which has now superseded WPN 17-7 on which our NH H&S Plan is largely based.

New Hampshire has not added a section to the Health and Safety Plan having to do with addressing pandemic conditions. Our Subgrantees are closely tied to the low-income Home Energy Assistance (HEA) program of the New Hampshire regulated utilities, and those utilities have developed and implemented a thorough and effective program for managing weatherization work in a pandemic setting; NH Energy therefore feels entirely comfortable in piggybacking on that utility program. NH Energy is, as well, part of the executive branch of state government in New Hampshire and has fully adopted and supports the State's regimen for addressing pandemic conditions, something which the

utility's programs have also done. We and the utilities and our Subgrantees, which are common to both programs, are all working from essentially the same guidance and with the same respect for and adherence to strong public health measures.

V.8 Program Management

V.8.1 Overview and Organization

The NH Department of Energy (NH Energy) is a part of the Executive Branch of state government. The Department was created by the State Legislature and began operations on July 1, 2021, and is moving expeditiously to unify and coordinate the activities of a number of smaller agencies and programs. NH WAP, which had been housed in the now former Office of Strategic Initiatives (OSI), became part of the NH Department of Energy when OSI disappeared on July 1, 2021.

NH Energy is responsible for:

- Promoting energy efficiency and reducing energy costs by supporting programs for low-income and other households, state government buildings, businesses, industry, non-profit organizations, and schools and municipalities.
- Administering sustainable energy programs to expand the use of renewable, domestic energy resources such as biomass, wind, and solar energy.
- Offering community services such as electric assistance, heating fuel aid and weatherization services, as well as providing consumer assistance to constituents dealing with utility issues.
- Advocating New Hampshire's position in front of State and Federal regulatory bodies.
- Helping to enforce Federal and State statutes and rules related to energy and utilities.

In managing these duties and responsibilities, NH Energy undertakes a number of programs and activities. Financial support for these programs comes from federal grants and from the State's General Fund.

NH Energy delivers an integrated array of federal programs including the State Energy Program (SEP) and the Weatherization Assistance Program (WAP), both supported by the US Department of Energy (US DOE), and the Low-Income Home Energy Assistance Program (LIHEAP) which is supported by the US Department of Health and Human Services (HHS). The WAP and LIHEAP work in NH is 100% federally funded.

V.8.2 Administrative Expenditure Limits

For PY23, as a result of recent federal action, the allowable percentage of the NH WAP federal allocation which may be devoted to administrative expenditures has risen from 10% to 15%. In accordance with 10 CFR 440.18(e), NH Energy retains no more than 7.5% of annual DOE WAP grant funds for administrative purposes. The administrative budget for NH Energy's WAP work will not exceed 7.5% of total funds awarded within an award period, except when allowed within program regulations as described below.

NH Energy will distribute at least 7.5% of the PY23 WAP grant allocation to Subgrantees for administrative purposes using the same allocation formula used for the base Program. Within a single budgeted program year, Subgrantees are allowed to re-class unused, or anticipated unused, administrative funds into their Program operations budget with prior NH Energy approval, to weatherize additional homes. But the transfer cannot move the other direction: once money has been budgeted for production, it may not be transferred to any administrative expense line.

As provided in 10 CFR 440.18(e), for any Subgrantee whose WAP allocation is \$350,000 or less, NH Energy allows for the use of up to an additional 5% of that Subgrantee's budget (excluding carryover) to cover administrative costs. NH Energy uses the following procedure to allocate the additional administrative funding:

1. NH Energy subtracts 15% from the total new DOE PY23 grant to cover administrative expenses (7.5% for NH Energy and 7.5% for Subgrantees). NH Energy then also reduces the award by the allowed allocation for T&TA. The resulting figure represents the minimum funding to be used for program expenditures.
2. The Subgrantee Program and Administrative allocations are calculated based on the NH allocation formula.
3. Subgrantees receiving less than \$350,000 in new PY allocated funds (including T&TA) may then use up to an additional 5% of their new sub-grant amount as additional administrative funds. In PY23, as in prior years, NH Energy will work with Subgrantees whose allocations come short of \$350,000 to assess the need for the additional 5% in administrative funds and, if necessary, build that amount into those budgets.

Unexpended administrative funds may be carried over from a prior PY within the award period, with US DOE approval, but the funds will be converted to program work, not expendable on administrative activities in the new program year. PY23 will be the second year in an award period and, therefore, unspent dollars from PY22 will be aggregated from the state's Subgrantees and then re-allocated to the Subgrantees using the same formula as is used to distribute the initial annual WAP allocation from US DOE.

If during a Program Year NH Energy determines that additional funds will be distributed due to changes in the NH Energy budget, those funds will be issued to the Subgrantees as Program funds and will not be combined with administrative funds except when NH Energy determines that additional administrative funds are available without exceeding 10 CFR 440.18(e) limitations.

V.8.3 Monitoring Activities

NH Energy redesigned its Subgrantee monitoring scheme in response to the COVID-19 pandemic and the need for remote and virtual monitoring protocols and activities, and we have made this an opportunity to create a more efficient and thorough and supportive annual monitoring and reporting process with our Subgrantees.

NH Energy's monitoring activities in PY22 (at this writing) are being completed using a combination of remote and on-site visit tools. A questionnaire based on guidance from WPN 20-4 and WPN 22-4 is in its third year of use, modified and revised from experience. This questionnaire, distributed to each of the Subgrantees, provides the base from which other monitoring activities are conducted. PY21 saw us return to on-site monitoring visits to each Subgrantee, where activities include a thorough fiscal review, client file review, scrutiny of final inspection reports and third-party Quality Assurance Inspection reports, and a look at a selection of electronic modeling examples from the Subgrantee's Energy Auditors. A monitoring visit day also includes an "exit meeting" with the weatherization principals at each Subgrantee office, presenting an opportunity to discuss observations made during the day and from the questionnaire. And each visit is followed by at least two one-on-one examinations of electronic auditing and work scope files which take place between NH Energy's technical consultant and the responsible Energy Auditors. For PY23 Subgrantee monitoring, NH Energy will further solidify and build upon the materials and processes developed in PY20, PY21, and PY22 in order to further improve the Subgrantee monitoring experience, to focus more attention on directly connecting monitoring and the provision of targeted T&TA services, and to continue seriously to record and track outcomes year-by-year across the whole breadth of WAP work.

In PY23, NH Energy will continue the process of training a new department-wide compliance officer and fiscal program monitor. As with the previous compliance officer, who retired in the third quarter of PY22, the new compliance officer will be responsible for, among a number of other things, the fiscal monitoring of the annual WAP Subgrantees. Part of the training for this work includes the deployment of NH Energy Business Office staffers to Subgrantee offices to conduct fiscal monitoring with the new compliance officer who will, over time, transition to being fully responsible for this portion of the annual WAP Subgrantee monitoring work in New Hampshire.

Please see the list of attachments to the SF-424 for examples of the NH WAP monitoring questionnaire, a monitoring summary letter to a Subgrantee, and a sample monitoring summary document which is appended to each monitoring letter.

Subgrantee monitoring typically begins with a review of any findings, concerns, or recommendations identified in prior monitoring reports to help determine what actions the Subgrantee has taken to address those issues. Preparation for monitoring also includes a review of the Subgrantee's latest financial audit, to glean information that may inform the WAP monitoring.

In recent program years, the monitoring process has been implemented in New Hampshire as a positive and necessary activity, used to encourage Subgrantee weatherization best practices, rather than as a negative corrective process. In some rare instances, monitoring is needed to correct serious program implementation deficiencies. More often, however, we have found that monitoring helps identify areas where positive encouragement in the form of improved communication, training, or

technical assistance is more appropriate. Monitoring is also being used to commend exemplary practices among the Subgrantees and to identify areas where the Grantee's (NH Energy's) program management can be improved, such as clearer policies and procedures.

So, due to the COVID pandemic, NH Energy switched to a largely virtual monitoring process in PY20. Many of the new features of the monitoring process were refined and improved and continued into PY21 and PY22, and it is on that base that NH Energy is building its monitoring program for PY23 and for subsequent program years as well.

A significant feature of the New Hampshire Subgrantee monitoring process is an electronic NH WAP Subgrantee monitoring questionnaire that covers monitoring topics identified in both the US DOE's WPN 20-4 and WPN 22-4. These elements have been incorporated into the NH monitoring scheme for PY23 along with guidance from the "WAP Onsite Monitoring Checklist." The questionnaire was adapted specifically for NH WAP Subgrantees. The questionnaire includes three distinct sections, on program issues, on fiscal issues, and on technical issues. For PY23 we anticipate that the questionnaire will be sent to Subgrantees by early fall of 2023, with a return deadline prior to the Thanksgiving holiday. A sample questionnaire is attached to the SF-424 accompanying this PY23 WAP State Plan. PY23 will also see continued refinement of the monitoring checklists used for collecting and examining additional data (see list in second paragraph below).

Subgrantee questionnaire responses are examined individually as well as alongside the other four New Hampshire Subgrantees. This process, compared to individual site visits, facilitates identification of exemplary practices that are given a "commendation" label. These Subgrantee best practices become opportunities for Subgrantees to learn from each other. Other questionnaire responses get noted if they need further clarity or a recommendation, or if they suggest the need for some targeted T&TA.

To round out the monitoring process, the self-reported questionnaire responses are combined with other monitoring data, including:

- A sampling of client files which will, in PY23, be inspected in-person during our on-site monitoring visits to each Subgrantee.
- Internal QCI (quality control inspection) reports, as described below
- External QAI (quality assurance inspection) reports, as described below
- TREAT computer energy modeling and work scope files
- Equipment calibration and staff/contractor certification lists
- Contracts with weatherization service providers
- Financial audits and statements
- Financial policies and procedures

The questionnaire responses and the primary data source items listed above all get analyzed in a systematic manner that is both thorough and efficient. Best practices are being commended, satisfactory work is noted, and recommendations for improvement are made. Any concerns and findings, in addition to being noted on the questionnaires or other documents, will be documented in the written monitoring letter for corrective action, as explained below. In future years, the monitoring system will be able to highlight corrective actions and other monitoring areas in need of attention – including guiding planners toward possible T&TA activities to address shortcomings – and the system will allow us to track commendations and best practices as additional possible sources for T&TA to

improve the work of other Program participants across the state network.

NH Energy’s program, technical, and financial monitoring of WAP Subgrantees is performed by NH Energy staff with outside assistance and input as needed. All monitoring activity is funded with WAP T&TA funds. Available funding and staffing will ultimately determine the method that NH Energy utilizes to conduct monitoring.

Beginning in annual WAP23, with the advent of BIL funding for low-income weatherization work, NH Energy will monitor Subgrantee management and oversight of both weatherization funding sources at the same time. We will utilize both the annual WAP staff and the new BIL WAP staff, and NH Energy will be continuing its relationship, on the annual WAP side, with our chosen program and technical monitoring specialist who will be working under a contract with NH Energy.

NH Energy has, for a number of years, used a contractor to perform the DOE-required technical “Quality Assurance Inspections” (QAI) of at least 10% of all completed annual WAP units in the state. For PY23, NH Energy will be working in the second year of a two-year contract with a third-party quality control and quality assurance consulting firm, Horizon Residential Energy Services, NHLLC, which will provide QAI services for the annual WAP work.

Assuming that some NH WAP Subgrantees will continue, at least in part, to use the same person to accomplish the initial home energy audit and the final quality control inspection, NH Energy will, under its contract with the quality assurance consulting firm, continue to inspect a minimum of 10% of each Subgrantee’s completed units using annual WAP money. If funding allows, NH Energy may inspect additional units, particularly if problems are discovered as a result of inspections of other units in the Subgrantee’s territory, or if previous monitoring of the Subgrantee has indicated that additional inspections should be done to test for assurance of compliance.

Subgrantees using contractors for weatherization installation work are expected to perform in-progress safety and compliance inspections, and NH Energy, using its QAI contractor, will perform at least two in-progress safety and compliance inspections on each Subgrantee during the course of the program year. And NH Energy will cooperate with the utility low-income Home Energy Assistance program which is expected to conduct in progress inspections of its work, as well, some of which is completed using at least some WAP funding. And both programs, as a result of utilizing the same CAP agencies to manage weatherization work, use essentially the same contractors, so in-progress inspections, even when not conducted on WAP completions, provide useful information to the managers of those weatherization funds and to the contractors whose work is being observed and assessed. In-progress inspections provide one of the paths to continuous improvement of WAP work in New Hampshire.

The external Quality Assurance Inspection process is also used to monitor the work of the internal BPI-certified Quality Control Inspectors (QCI) who conduct final inspections for Subgrantees. Along with a BTDIS energy audit data collection form (building test data information sheet) which includes spaces for the QCI’s final inspection diagnostic data, an additional NH WAP QCI inspection form – the Narrative Assessment Form – helps document some of the more subjective but equally important observations and assessments required of a professional Quality Control Inspector. The internal QCI, along with the external QAI, help identify training and technical assistance needs, in addition to

servicing important quality management roles. Both the BTDIS and the Narrative Assessment Form are attached to the SF-424 associated with this PY23 NH WAP State Plan.

NH Energy has developed procedures for addressing corrective actions and the process for the discipline and/or possible removal from the program of Subgrantees who are unable to meet WAP standards. In addition to its own monitoring and risk assessment activities, NH Energy reviews all Subgrantees' financial audits as required by 2 CFR 200 Subpart F, and NH Energy follows up on findings or concerns coming from either source by determining a corrective action plan and then monitoring to ensure that the actions proposed in the corrective action plan are completed satisfactorily by the date agreed upon.

NH Energy closely monitors Subgrantee performance and compares monthly performance data to benchmarks for the program, such as the monthly production and overall job average as compared to approved budgets and production schedules.

Each Subgrantee's technical work will be monitored on a regular basis. Additional monitoring visits will be conducted with Subgrantees which are observed to have difficulties in managing the program as required by fiscal, programmatic, and technical rules and regulations, and/or that receive findings or concerns during a monitoring or field inspection. Flexibility in scheduling will be retained to allow additional visits as needed, in order to resolve specific problems, or to facilitate training objectives.

NH Energy measures the performance of Subgrantees against their own goals and previous performance levels – which themselves establish a base from which to compare current performance. If any Subgrantee is performing in a less than optimal manner, NH Energy will attempt to identify and offer or recommend appropriate training and guidance. Progress will be closely monitored by NH Energy's staff and compliance contractors to assure that the Subgrantee resolves the issues in question. If a Subgrantee does not make corrections as recommended or required and NH Energy continues to observe non-compliance, the Subgrantee will be at risk of losing funding.

Subgrantees are subject to removal from the program and will be defunded of all remaining funds if they are identified as being consistently non-compliant with program requirements, including the requirements established in a corrective action plan designed to move the Subgrantee into compliance on any issue. Non-compliance includes but is not limited to situations such as:

- Consistently demonstrating poor work quality with little or no noticeable improvement.
- Consistently displaying inadequate or improper fiscal and/or management control systems, defined as those systems which are required to ensure program compliance and reduce the potential for waste, fraud, and abuse.
- Failure to meet quarterly goals for two consecutive quarters when compared to approved production schedules and budgets (specifically, variances in excess of 20%).
- Failure to comply with federal or state program requirements including 10 CFR 440, 2 CFR 200 and other relevant rules and regulations.

Corrective action plans for these and other identified shortcomings shall establish a time frame for implementation of the corrective action(s) and shall provide for regular interim monitoring and check-in to mark progress toward full compliance.

A Subgrantee that is removed from the program will not be eligible to receive US DOE Weatherization funds until NH Energy has determined that the Subgrantee has corrected its deficiencies and is prepared to manage the program effectively. NH Energy may seek an alternate Subgrantee(s) to provide weatherization services in the affected areas or may solicit bids from qualified contractors.

Units which are inspected by NH Energy as part of the Quality Assurance Inspection process (covering 10% of all completed units in the state) and found not to be in compliance with program requirements must – since they will have already undergone a final inspection and been submitted to NH Energy as completed units – be brought into full compliance with both the original work order and the SWS/NH Field Guide standards and requirements, all at the expense of the responsible Subgrantee, and then be re-evaluated by the QA inspectors. Depending on the nature and severity of the QA findings to be corrected, a QA re-inspection visit may be necessary. Failure to meet the required standards and expectations will result in the unit's removal from the Subgrantee's production completion list.

If deficiencies are found in a unit by the Subgrantee's QCI, prior to the unit's submission to NH Energy for reimbursement as a completion, then the Subgrantee may return to the job and make the necessary corrections and conduct a second QC inspection and the costs associated with those corrections may be included in the completed cost of the job and submitted for reimbursement.

NH Energy has also developed procedures for addressing deficiencies found in the performance of individual WAP personnel. The quality control inspection, for instance, is essential to moving a job from the installation phase to the payment phase; without a properly done final inspection, NH Energy is in jeopardy of paying for work that does not meet standards and does not provide the client with the expected energy efficient, comfortable, and safe whole house outcome that is WAP's mission. If an individual Quality Control Inspector is found to consistently fall short of meeting one or a number of the expectations required of QCIs by the standards and procedures established for final inspections, NH Energy will:

- Work with that QCI to clearly identify the problem(s).
- Recommend or provide appropriate training opportunities to improve work.
- Follow-up as needed to ensure compliance.

QC Inspectors who are unable or unwilling to meet expected standards and practices will not be allowed to provide QCI services in NH until compliance has been demonstrated. NH Energy will work with BPI to ensure that the QCI credential is not misused and to see that the holder of a QCI credential is performing to the standards expected.

Other WAP personnel, from Program Managers to office staff to Crew Chiefs and Retrofit Installer Technicians, are subject to similar review and corrective action when necessary.

Written monitoring letters are provided to the Subgrantee Executive Director, the Weatherization Program Director, and the Fiscal Officer within thirty (30) days of the completion of the monitoring visit. These reports outline specific findings, concerns, recommendations, and corrective actions as deemed necessary, and they identify commendations, and best practices. A response from the Subgrantee, if required, describing the corrective action taken or planned, must be received by NH Energy within thirty (30) days of the date of the report. In the case of technical or fiscal monitoring, when NH Energy receives no response, NH Energy reserves the right to disallow the cost of any discrepancy, or in the case of technical monitoring, the entire cost of the unit may be disallowed. Disallowed costs will be refunded to NH Energy by check or by being deducted from the Subgrantee's next monthly reimbursement request as long as that reimbursement request is for a month that is in the same program year. NH Energy tracks the progress of Subgrantees as they implement responses to monitoring reports.

Annually, under WPN 20-4, NH Energy summarizes the financial reviews, program monitoring reports, and any outstanding issues for all NH Subgrantees. This Monitoring Analysis Overview identifies the needs, strengths, and weaknesses of each Subgrantee and is made a permanent part of the Subgrantee monitoring files.

At the close of the WAP Program Year, NH Energy prepares the annual T&TA, Monitoring, and Leveraging Report and submits it into PAGE.

An analysis of the use of T&TA money for supporting certain NH WAP activities has found that approximately 25% of the T&TA allocation to NH is utilized in monitoring activities.

V.8.4 Training and Technical Assistance

NH WAP T&TA activities are intended to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Assistance Program at all levels. Activities are designed to maximize energy savings, minimize production costs, improve program management and crew/contractor "quality of work," and/or reduce the potential for waste, fraud, abuse, and mismanagement. Subgrantees are the primary beneficiaries of T&TA funds, either through direct allocation at the beginning of the program year, or through the monitoring and training provided by NH Energy. NH Energy also uses T&TA funds to significantly augment, through contracting, the technical capabilities of the small NH Energy WAP staff, to assist broadly with oversight of Subgrantee performance (monitoring), and to refine the program for improved management and efficiency in future years.

Goal: The NH WAP PY23 T&TA Plan is designed to continue a transition started in PY21, moving toward a more comprehensive, multi-year, cyclical program of T&TA guidance and reminders that will provide all NH WAP staff and contractors, at both the Grantee and Subgrantee level, with regular "comprehensive" (Tier 1) as well as "specific" (Tier 2) training and technical assistance. Training and assistance will be designed to keep Program participants current and conversant with the knowledge, skills, and abilities required to properly perform the tasks expected of them, and to present

opportunities for improvement, job upgrades, and recognition as professionals over a recurring three to five-year rotation of training emphases.

In PY23, utilizing newly acquired BIL WAP dollars and newly hired BIL WAP staff, NH Energy is embarking on the long-overdue development of a comprehensive strategic plan for the long-term delivery of training and technical assistance programming in the state. Both annual WAP and BIL WAP work in New Hampshire utilize the same Subgrantees and the same contractors, so this new strategic plan is being designed to provide T&TA to personnel working under both funding resources and at all levels, from Grantee and Subgrantee administrative personnel through program managers to field installation staff and contractors. The aim is to provide guidance for the NH weatherization work over the long haul, seeking to establish a plan that will integrate, on a rolling multi-year cyclical basis, the key elements of workforce development, training and technical assistance for that workforce, field weatherization production work on a ramped up schedule, and monitoring for improvements in a way that serves the weatherization community, and our clients, best.

Analysis of Training and Technical Assistance need in New Hampshire: Training and Technical Assistance (T&TA) needs are determined through a variety of methods including: Subgrantee and Grantee ACSI Surveys, DOE Grantee monitoring, annual Subgrantee monitoring by NH Energy, monthly NH WAP meetings and conference calls and desk-top monitoring, NH WAP Technical Committee meetings, training event evaluations from participants, quality assurance (QA) inspection reports completed on 10% of NH WAP-funded jobs annually, and Subgrantee internal quality control inspections (QCIs) performed on 100% of NH WAP-funded jobs each year.

The annual NH Weatherization Assistance Program has, in addition to Program management staff, access to subcontracted T&TA specialists, all involved in one aspect or another of assessing training needs and providing or designing and arranging training activities to meet those needs. This includes a BPI-certified QCI, who, through NH WAP tutoring and mentoring services, as well as through chairing the NH Weatherization Technical Committee, provides direct input for training planning, and is often involved in providing that training. Another BPI-certified QCI, who is also a local community college workforce development manager, providing technical expertise to NH WAP regarding Subgrantee monitoring, including identifying T&TA needs and doing workforce assessments. Another long-time WAP management and evaluation veteran with additional experience in utility weatherization programs, for both market-based and low-income clients. NH Energy has a contract with a high-performance building and weatherization inspection company to provide the DOE-required Quality Assurance Inspections (QAI) and to, with its QCI credentialed staff, sift through observations of finished work in the field and make recommendations to NH WAP regarding training needs that may be necessary to improve the quality of field work being observed.

Weatherization needs assessment efforts at the national level also help characterize and define overall T&TA training needs in New Hampshire. Necessary knowledge, skills and abilities (KSAs) are outlined in DOE's National Renewable Energy Laboratory's (NREL's) job task analyses (JTAs) for common positions in the NH WAP system. These positions include (with the most recent NREL JTA document # in parentheses):

- Energy Auditor (2018: NREL/TP-7A40-70985)
- Quality Control Inspector (2018: NREL/TP-7A40-70977)
- Weatherization Installer (Domain III in Crew Leader JTA)

- Weatherization Crew Leader (2019: NREL/TP-7A40-73578)
- Weatherization Assistance Program Administrator (JTAs built into NREL's WAP Administrative trainings)
- Heating Technicians, Electricians and other positions for which there are no specific JTAs

Competence in the performance of the tasks set out in these documents enables staff and contractors to meet the goals and requirements of the NH WAP that are presented in this State Plan, in the Policies and Procedures Manual, as well as in the NH WAP *Field Guide*. As part of a multiyear T&TA strategic plan, the NH Weatherization Assistance Program intends to develop more robust mechanisms to analyze the results from this wide range of T&TA needs assessment sources. In the future, T&TA needs and the planned trainings summarized in the template will be characterized according to JTA categories.

As outlined in the Workforce Development section, below, weatherization work is expanding in New Hampshire as a result of both additional federal funding and State-authorized funding increases for the low-income utility program. With additional funding will come a need for significant expansion of the weatherization workforce. While existing workers have important and identifiable T&TA needs, new workers will have even greater T&TA needs. The T&TA strategic plan being developed for New Hampshire weatherization work will bring clarity to job tasks, career pathways, and training ladders, with stacked credentials and increasing compensation frameworks for increasing responsibilities. This career clarity will also help with worker recruitment and retention.

New Hampshire works with new hires in weatherization positions under the guidance set out in Chapter 7 of the NH Weatherization Policies and Procedures Manual (P&PM), 2020 Edition. Please find the P&PM attached to the SF-424 as part of this PY23 State Plan.

The COVID-19 pandemic presented, and continues to present, a set of challenges which will increasingly contribute to what the T&TA needs in New Hampshire look like. Workers laid off or furloughed due to the field work suspension early in the pandemic have not all returned. Finding and training new workers is a considerable task. NH WAP's capacity to train new people, from field installers to Auditors and QCIs to office and program management personnel, will be hard pressed to grow quickly enough, and without compromise of quality, so that the demand can be met. Regional unemployment levels will affect worker recruitment and training. Contractors need to see a solid and economically stable future in order to be confident about the value of investing in new weatherization trucks, more field staffing, and the necessary increase in administrative staffing and equipment. There are many varieties of uncertainties remaining but the need for skilled and committed people is rising rapidly and is at the top of the list of things that WAP T&TA money must be buying – we seek to build a clear career pathway for new people and an attractive opportunity for experienced hands, with the actionable T&TA goals and activities that will provide a consistent flow of skilled and committed people into all weatherization positions.

Work force development: Even before the arrival of the pandemic, one of the most widely recognized and critical needs in the high performance, energy efficient building arena in New Hampshire was the identification and training of workers up and down the range of positions necessary to maintain and sustainably grow a viable and productive weatherization program. Now, funding for weatherization work appears to be expanding annually in New Hampshire, both from the

US Department of Energy for WAP, and, despite a set-back in the fall of 2021, from the NH Public Utilities Commission for the utilities' low-income Home Energy Assistance (HEA) program. The opportunity to significantly improve the energy efficiency of NH's housing stock is large. And the federal government has moved to provide another sizeable infusion of additional WAP money into the PY23 time frame in the form of BIL (bi-partisan infrastructure law) funding. What the legacy of the COVID-19 emergency may do to impact that spending opportunity – also a significant spending challenge – remains to be seen, but as we move toward the start of PY23, the NH weatherization network, including WAP, and HEA, and all the contracting organizations and firms that support that network, remains committed to finding and employing and training people to fill the critical roles necessary to be sure that NH's weatherization work is able to absorb and properly use the increased funding, and to do it by providing top tier quality home energy efficiency upgrades to low income households in every part of the state.

NH Energy's T&TA budget for PY23 includes significant support for:

- Collaboration with HEA to provide timely and targeted training for new hires into weatherization work at all levels.
- Development of a state-wide, multi-year strategic weatherization training plan, to include WAP, HEA, and the nascent and promising work of the Lakes Region Community College with the Tri-County Community Action Program to implement a new weatherization worker apprenticeship program to train new and candidate hires for long-term and sustainable weatherization employment.
- Close and continued focus on providing “on the job site” training for weatherization installation crews, whether those crews work directly for one of NH's Subgrantees, or for a private contracting firm.

T&TA implementation and delivery: The New Hampshire Weatherization Assistance Program is somewhat disadvantaged by the lack of a properly accredited in-state training facility which could provide necessary training services at a more affordable cost and with a greater familiarity with New Hampshire's particular needs. In fact, across all of Maine, New Hampshire, and Vermont there is no accredited Weatherization Training Center. Comprehensive (Tier 1) training in NH must currently include significant travel costs, for either our weatherization personnel to go out of state, or for the trainers/instructors who need to come to us if we are to have the benefit of their “comprehensive” training.

In PY23, NH Energy will both continue to seek out suitable comprehensive and specific training opportunities for at least some portion of the in-state network of weatherization staff and contractors, and we will focus as much attention as possible on the development of a longer-term, cyclical, and strategic T&TA plan for the state weatherization network – which includes the utility-sponsored low-income Home Energy Assistance (HEA) program and its contractors. For PY23, our T&TA Plan leans toward engaging local, less expensive, but still professional and “WAP-savvy” training resources, thereby stretching the use of T&TA dollars and increasing the number of weatherization personnel who will benefit. We have begun the discussions and the research necessary to establish a more strategic and far-reaching T&TA plan, one that takes the job task analyses that describe key weatherization positions into account over a number of years on a recurring basis and supports each of those positions with essential knowledge, skill, and ability training, certifications, and career

advancement opportunities.

A particular emphasis for T&TA implementation in PY23 will be the weatherization installer (the “retrofit installer technician”), the weatherization crew leader, and the Energy Auditor positions and their interconnected job tasks. NH WAP will continue to work on adapting NREL’s Retrofit Installer Badges Toolkit for use in New Hampshire as a way to bring credentialing to weatherization installers and their supervisors. The mini credentials that are associated with these badges fit well with both the job tasks and the learning styles of these workers. In support of this badges program, NH WAP will continue to emphasize on-the-job learning for installers, both internally, from crew leaders and auditors, as well as externally, from trainers who visit job sites. The essential role of the Energy Auditor as the professional responsible for overall job site success will be emphasized. And this program will be supplemented with more formal hands-on installer skills training as needed.

Proposed training activities: The remaining specifics of the PY23 T&TA plan are presented on the planning and tracking template provided by the DOE. That template is attached to the SF-424.

Seeking a WAP management software system: In PY23, NH Energy will continue the effort to resolve one of the challenges facing weatherization work generally in New Hampshire: obsolete, inconsistent, and uncoordinated data collection and management systems in use by the Community Action Agencies and by NH Energy. There is no central program management system for WAP at all, but NH Energy’s Low-Income Home Energy Assistance Program (LIHEAP) is moving to upgrade its management systems in order to develop and track the performance measures required by the U.S. Department of Health and Human Services, its funding source. Our investigation into the software that will enable this work suggests that the same software could be expanded and built upon to serve the data needs of the Weatherization Assistance Program at the same time. Each of the five WAP Subgrantees in NH is also a LIHEAP Subgrantee, overseen and managed at the state level by personnel at NH Energy. NH Energy formed, in late calendar 2021, a department working group to focus on the preparation and release of a Request for Proposals (RFP) to find a suitable vendor of digital management services to provide the necessary program management software. That working group has met throughout PY22 and is planning to release a comprehensive RFP in PY23.

V.9 Energy Crisis Plan

The NH Department of Energy is a member of the State's emergency response team, which is guided by the State of New Hampshire Emergency Operations Plan. US DOE Weatherization funds are not used for either the maintenance of the plan or to respond to a general energy crisis.

NH Energy has reviewed WPN 12-7 and understands what activities are allowed in the event of a crisis and understands that even in the event of a crisis, US DOE does not waive regulatory requirements.

END OF DRAFT NH WAP PY22 STATE PLAN.