

New Hampshire Department of Energy (NH DOE)

**NH Weatherization Assistance Program (WAP), Annual Allocation
Program Year 2024 (PY24)**

July 1, 2024, through June 30, 2025

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

DRAFT @ 040924 for PAC meeting and Public Hearing

Text in brown font is from PY23: re-**DRAFTING for PY24 IS NOT COMPLETE.**

Text in green font is new or revised for PY24 and not yet fully reviewed and accepted. Please review and comment.

Text in black font is completed for PY24, BUT changes/revisions are absolutely still possible. Please feel free to add comments.

Introductory comments for the reader:

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 PY24, but collaboration between the Programs is high.

The allocated budget amount for Annual WAP work in NH in PY24 will be almost exactly the same as the PY23 amount. But at this writing (040924), we have not yet received the actual figure from the US Department of Energy (US DOE). So, as instructed by US DOE, we are preparing the PY24 budget using PY23 numbers in order to have a complete State Plan to submit on May 3. That budget is in preparation, but because the amounts are likely to be so similar, it is reasonable to assume that the PY24 budget will differ only slightly from last year. The NH WAP allocation formula is changed a small amount by the use of new county population numbers and new totals for approved Fuel Assistance Program (FAP) applications, but the overall impact of these changes will be small. A proper PY24 budget will be prepared as soon as we have the actual allocation numbers from US DOE.

BEGINNING OF THE “ANNUAL FILE” SECTION

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 for PY24 and the US DOE-prescribed average cost per unit of \$8,497, the following number of job completions is anticipated at each of the Subgrantees by the end of PY24, on June 30, 2025:

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 -	?

[The above numbers will be filled in as soon as we have the budget completed.]

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 PY24 federal funds to the state will contribute to completing weatherization work in X? 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 \$8,497 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 PY24, New Hampshire will not be devoting any DOE funds to seeking out additional leveraged funding sources.

IV.5 [Lists the Policy Advisory Council members]

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

IV.7 Miscellaneous

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NH WAP: 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 PY24 NH DOE is using the same formula to allocate funds among the five NH WAP 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, the amount for

health and safety and other “optional budget category” spending, and the amount of “readiness” funding for each of the Subgrantees. “Readiness” funding is intended to reduce the number of job deferrals by supporting home improvement work that is not eligible for regular WAP funding; “readiness” funding is used to remove a dwelling from deferral status and make it “weatherization ready.”

The allocation formula includes these three variables:

- Each county’s percentage of the total number of statewide certified Fuel Assistance Program (FAP) applications in the prior FAP program year.
- Each county’s percentage of the state’s population with incomes no greater than 200% FPG.
- Each county’s percentage of the state’s average heating degree days (HDD) from 2018 to 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 or below 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 PY24, NH DOE will distribute the PY24 annual WAP funds to our Subgrantees using the number of certified FAP applications in NH from LIHEAP program year 2023, the county population numbers from calendar year 2022, and last year’s HDD numbers.

This results in the following PY24 allocations to NH WAP’s Subgrantees:

CAP Belknap-Merrimack Counties, Inc.	17.7%
Community Action Partnership of Strafford County	9.7%
Southern New Hampshire Services, Inc.	35.0%
Southwestern Community Services, Inc.	16.1%
Tri-County Community Action Program, Inc.	21.5%
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, deny requested reimbursements, and/or reduce or eliminate funding available to a Subgrantee as a result of:
 - a. Failure to meet, without adequate explanation, monthly production and budget goals for three (3) consecutive months when compared to approved production schedules and budgets.
 - i. In accordance with NH DOE's commitment to efficient and effective program management, no reimbursements will be made for more than two consecutive months without documented completions.
 - b. Failure to maintain the average cost per unit (ACPU) below the maximum prescribed each year by the US DOE.
 - c. Failure to comply with reporting requirements.
 - d. Discrepancies or inconsistencies in reporting which may be revealed through the monitoring of Subgrantee records.
 - e. Program operations or expenditures which are not in compliance with provisions of the contract.
 - f. Late and/or inaccurate costs supplied after payment deadlines.
 - g. Failure to comply with or respond to monitoring report corrective actions or other significant findings.
2. Additionally, Subgrantee contracts include clauses that give NH DOE the right to withhold payments and to re-allocate funding due to underperformance, such as:
 - a. Significant and/or repeated deficiencies discovered during field inspections or Subgrantee on-site monitoring.
 - b. Repeated poor quality and/or ineffective workmanship documented but not corrected as directed.
 - c. 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
 - d. 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.
3. 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 the Subgrantee's capacity to perform, or NH DOE's required budget necessary to manage the program, at its discretion but within Program regulations, after the initial allocation has been made.
4. 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.
5. In the event of a reduction in New Hampshire's PY24 federal funding, NH Energy may, after

- calculating Subgrantee allocations, further negotiate final funding allocations with all Subgrantees.
6. If a Subgrantee is not funded for any portion of PY24, 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.

NH WAP: Three major collaborations:

- Home Energy Assistance (HEA) program of the NH regulated utilities
- NH LIHEAP
- NH BIL WAP funding

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 this 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 WAP 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 WAP.

The Average Cost per Unit, however, does reflect how the program works on the ground. More than 90 percent of Annual WAP projects have blended funding streams (Annual WAP, HEA, and often other sources, including locally donated funds, CDBG funds, and some LIHEAP funds transferred into weatherization work). In PY24, NH WAP is using \$8,497 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 Annual WAP funds. We estimate that by the end of PY24, using that \$8,497 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 Annual 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. PY24 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 DOE 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 PY24 NH DOE 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 back to US DOE on program implementation at all levels.

One of the more important ways in which the low-income weatherization work in NH is affected by the ongoing collaboration between NH WAP and the utilities’ HEA program is in the annual establishing of price lists for the purchase and installation of energy conservation measures (ECMs).

The following describes the process which establishes the price lists used by the NH Community Action Programs (CAPs) when they:

- 1) Seek payment from their funders for the costs of installing energy conservation measures (ECMs) in client homes.
- 2) Pay subcontractor and vendor invoices for labor and materials involved in the ECM installation process.

Each CAP works from two price lists:

- **Price List #1** is updated in the fall of each year by the utilities (in consultation with stakeholders) to establish the maximum amount the utilities will reimburse for ECMs installed in successfully weatherized client homes. Each CAP agency uses Price List #1 to invoice each ECM to the utility low-income weatherization programs (HEA) for work completed. In some cases, Price List #1 may be used to invoice each ECM to the NH DOE Weatherization Assistance Program (WAP).
- **Price List #2** is a small percentage lower than Price List #1. Price List #2 is created annually by each CAP (in consultation with its subcontractors) and with approval from NH DOE. Price List #2 accomplishes two things:
 - In most cases, it establishes the cost the CAPs will pay their subcontractors for each successfully installed ECM in a completed weatherization unit.
 - In most cases, it establishes the cost that the CAPs may invoice NH DOE for each federally funded WAP and BWP ECM installed in a completed weatherized unit.

As can be seen from the above, subcontractors and vendors completing HEA-related work for CAPs might receive a payment that is less than the amount that the utilities pay the CAPs for completing that work. This slight HEA-allowed markup provides payment to the CAPs for the administrative and other indirect costs – the “general contractor” costs – of running a weatherization program. These are expenses that the HEA does not otherwise reimburse but which WAP and BWP do cover in our contracts with the CAPs by providing separate budget amounts for administrative and project management costs in the annual CAP allocations of the federal dollars.

But when federal funding is used (WAP or BWP), there is no difference between what the CAPs pay their subcontractors and vendors and what they are reimbursed by NH DOE because with federal funding the CAPs function essentially as pass-through entities.

There may be minor ECM payment differences from one CAP territory to another. Each CAP, in consultation with local subcontractors and vendors, may create its own “Price List #2,” based on area prevailing wages and the local cost of materials. Both labor and materials costs can vary geographically within the state, and Price List #2 at each CAP reflects these variables. A subcontractor working in more than one CAP service territory may experience slight differences in payment for similar ECMs. Still, the process is transparent, and subcontractors agree to the pricing structure in advance.

The NH Policy & Procedures Manual (P&PM) Section 5.3.1 contains the following Procedures for Annual Procurement of Pre-Qualified Contractors and Establishing a Measure Unit Price List.

Some Subgrantees may choose to assemble a pre-qualified list of contractors from which they can select contractors to use on an ongoing rotating basis. In these cases, section 5.2 applies. The bid package should be updated annually to incorporate new program guidance, contractor requirements, and updated measures. To ensure the efficient operation of the New Hampshire Weatherization Assistance Program, this policy outlines the procedures for the establishment of a measure unit price list by the Community Action Agencies.

- *Guidance for Price Lists:* The HEA energy conservation measure price list (Price List #1) is updated annually by the utilities. This list serves as a guideline for CAAs when generating their own price list (Price List #2), which is slightly lower than Price List #1. Price List #2 is developed by each Subgrantee in consultation with its subcontractors and vendors, with the approval of NH DOE, to ensure it reflects local market conditions, area prevailing wages, and the local costs of materials.
- *Subgrantee Flexibility with Internal Crews:* For Subgrantees that operate with an internal weatherization crew and perform weatherization using HEA and WAP or BWP funds, it is recognized that these Subgrantees face unique operational and financial dynamics. Therefore, it is permissible for these Subgrantees to apply Price List #1 for billing WAP projects completed by internal or external crews.
- *On no project shall a Subgrantee bill NH DOE more than the amount paid to a subcontractor for any WAP work completed on that project.*

This policy aims to grant flexibility to Subgrantees, allowing for adaptation to local market conditions and their business model while ensuring cost-effectiveness and adherence to USDOE regulations.

If any prices are re-negotiated during the program year, a proposed new ECM price list shall be forwarded to NHDOE for review and approval.

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 PY24, NH DOE will allocate BWP funds to NH WAP Subgrantees using the same allocation formula that determines the distribution of Annual WAP funds. NH DOE anticipates moving at least \$550,000 in FAP money into BWP work in PY24.

NH DOE's LIHEAP 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 DOE 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 PY24, 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 Administrator 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 BIL WAP funding: NH's WAP work has been significantly augmented by the arrival and use of additional WAP funding coming from the federal Bi-Partisan Infrastructure Law (BIL). While the two WAP funding streams cannot be used together on the same dwelling, the NH WAP staff, now four people, is collaborating at every opportunity, working to see that high quality weatherization assistance is provided uniformly across all ten counties of the state. Policy and programming upgrades are being implemented jointly for both funding streams, T&TA planning and activities are being designed to benefit our common Subgrantee implementers and their clients for whom the funding source for home upgrades is essentially immaterial, and in-common activities such as Subgrantee monitoring and risk assessment are being planned and completed in strong and regular communication with each other. The quality of WAP administration and management, as well as on-the-ground performance, is markedly improved by the arrival of BIL WAP money and the additional program reach and thoroughness that it is making possible.

NH WAP: Subgrantee Notices/Memos

NHDOE will issue Subgrantee Notices or Subgrantee Memorandums to the appropriate members of the New Hampshire Weatherization Network in response to issued US DOE Weatherization Program Notices (WPN) or Memorandums (WPM), and/or additional changes or updates to Wxn policies and procedures.

Subgrantee Notices (SN) will be issued to the network when the US DOE issues a WPN or WPM that requires a change to NHDOE's current policies and procedures. An SN will also be issued in response to a training, discussion, or research, where it is determined that the current NH WAP network practices do not comply with US DOE standards and/or requirements. The SN will require a change in current policy within 30 days or less. The SN will outline who the policy change applies to, what the changes are, and when exactly those changes take effect. The SN will supersede the outdated NH Policy & Procedure Manual (P&PM) guidance until the next P&PM update, where the new guidance can be added to the manual.

Subgrantee Memorandums (SM) will be issued to the network when the US DOE issues a WPN or WPM that provides additional or clarifying information for how a policy or procedure is to be conducted but does not change the actual policy or procedure itself. An SM will also be issued in response to a WPN or WPM, training, discussion, or research that requires a general update to the network, with little to no required action. SMs will not require an update to the P&PM but may be added to the next P&PM update if it helps clarify the policy or procedure.

BEGINNING OF THE “MASTER FILE” SECTION:

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

The NH Weatherization Assistance 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 PY24 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 Assistance Program Energy Auditor or a Building Analyst-Professional); 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 Fuel Assistance Program (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 2022 (the most recent complete year available), NH's population by county was the following:

Total population by county:

Coos County	29,624
Grafton County	84,938
Carroll County	51,400
Sullivan County	43,391
Cheshire County	74,259
Belknap County	64,005
Merrimack County	149,643
Hillsborough County	419,581
Rockingham County	317,164
Strafford County	125,889

Statewide total 1,359,894

Total population living at or below 200% FPG:

For 2022, the American Community Survey identified approximately 247,325 people in New Hampshire, or approximately 18 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, the client priority scorecard, electronic audit report, auditor's project notes, work orders, and final inspection notes and report. NH WAP'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 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.

Reweatherization Compliance

Generally, WAP services are provided only once for each dwelling unit. However, US 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 US 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” re-weatherization availability date.

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 DOE 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.

Addressing Rental Units/Multifamily Buildings

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 DOE 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 DOE a completed TREAT ".tpg" file, a narrative, and a Multi-Family Project checklist form. NH DOE 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 DOE'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 DOE 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 is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative resources are found. Subgrantees should strive to work with applicants to resolve conditions where a deferral has been issued. Subgrantees are expected to pursue reasonable options and referrals on behalf of the dwelling owner and to use good judgment in dealing with difficult situations. Subgrantees should not defer service simply because of 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.”

Deferral Situations

The following is a list of the more common conditions and situations a Subgrantee may encounter while considering weatherization services. This list is not intended to be inclusive of all instances in which a Subgrantee may choose not to weatherize a unit. In some instances, corrective measures by the client/owner may allow program services to proceed.

- 1) The dwelling unit is vacant.
- 2) The dwelling unit is uninhabitable.
- 3) The dwelling unit is for sale or the client moves. If work is being performed on a unit and the unit is placed on the market for sale or the client moves, the Subgrantee should complete the repair and/or the particular energy conservation measure work in progress along with any health and safety measures necessary to secure the well-being of future

occupants. However, additional energy conservation measures or repair work should not be started. The dwelling will be left with the weatherization work not completed (and therefore not to be reported to NHDOE as a completion), but the Subgrantee may seek reimbursement for work accomplished.

- 4) The dwelling unit is scheduled for demolition.
- 5) The conditions at the dwelling unit are deemed by the auditor to pose a threat to the health and safety of the crew.
- 6) Extended periods with standing water, exposed dirt basements/crawl spaces, mold, friable asbestos, deteriorated lead-based paint surfaces, or other hazardous materials that cannot be addressed by the weatherization work (also see Chapter 9, Health and Safety).
- 7) Evidence of infestation of rodents, insects, and/or other vermin that cannot be addressed through weatherization.
- 8) Un-vented space heaters that do not meet ANSI Z21.11.2 rating.
- 9) Unsecured pets that may prevent workers from safely completing their work.
- 10) The presence of sewage or animal feces in or around the home. ~~30~~
- 11) Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- 12) Maintenance or housekeeping practices that limit the access of workers to the dwelling or create an unhealthy work environment.
- 13) Major remodeling is in progress, which limits the proper completion of major weatherization measures.
- 14) Electrical or plumbing hazards or structural failures that cannot be addressed as a part of weatherization services.
- 15) Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- 16) Lack of cooperation from the client.
- 17) The illegal presence or use of any controlled substance in the home during the weatherization process.
- 18) Occupant has known health conditions that prohibit the installation of insulation or other weatherization materials.
- 19) The eligible household moves from the dwelling unit where weatherization activities and services are in progress. In such a case, the Subgrantee must decide whether to complete the work, and the circumstances must be documented in the client file. Reimbursement for incomplete work may be sought from NHDOE with proper documentation. See #3 above.
- 20) When there are minor children in the dwelling but no adult client or adult agent of the client at a time when sub-grantee personnel or subcontractors must enter the dwelling.

Deferral After Client and Dwelling are Determined Eligible

The need for deferral after both the client and the dwelling have been determined eligible for WAP services may be the result of misunderstandings or unintentional misinformation. Subgrantees must report the issue to the NHDOE WAP Manager for review. NHDOE will investigate and refer to additional authorities if necessary.

Deferral Policy

When service is deferred, the owner or occupant must be notified in writing and should be given a reasonable time frame to correct the problem. Examples of reasonable time frames would be thirty (30) days for housekeeping concerns or ninety (90) days for major remodeling work.

Deferral Notification Requirements

If a Subgrantee chooses not to weatherize a dwelling unit, the Subgrantee must, within five (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. If the use of Weatherization Readiness Funds (WRF) is an option for this client, the client must be informed of the option and of the extent to which WRF support will address the reason(s) for deferral. The “Consent to Perform Work” form must be annotated in such a way as to adequately describe the WRF-supported work to be completed at the home and to emphasize the obligation the client then has to proceed with the full weatherization retrofit once the WRF-supported work is completed. This annotated “Consent to Perform Work” form must be signed and dated by both the client and the Subgrantee representative responsible for the arrangements.
- 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 (see section 2.12).

Eligible applicants who comply 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 FAP eligibility period due to a deferral.

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 (mold or other problems) are required and must be maintained in the client file.

Deferral Tracking

Any dwelling that is deferred for any reason, whether the dwelling receives Weatherization Readiness Funds (WRF) or not, must be tracked on the agency's deferral tracker. The agency must record the following data points for each dwelling on the tracker:

- WAP intake date
- Date the dwelling was deferred
- Date the dwelling became Weatherization ready (if applicable)
- Date the dwelling was weatherized (if applicable)
- Funding source used for the full home weatherization (only applicable if the dwelling became weatherization ready)
- Street address
- City
- State
- County
- Zip Code
- Dwelling occupancy type
- Building type
- Year built
- Fuel Type
- Stage the dwelling was deferred in
- The total number of reasons the dwelling was deferred
- The issue or action needed for each individual deferral reason
- The WRF category for each individual deferral reason
- Total remediation cost for each individual deferral reason (if applicable)
- Amount of non-WAP funding used for each individual deferral reason (if applicable)
- Amount of WRF applied to each individual deferral reason (if applicable)

*Please note: the last 5 bullets must be repeated separately for each deferral reason.

A completed deferral tracker must be submitted to NHDOE via SWAP with each monthly reimbursement request. If the agency does not have any deferrals to report, they must note it in the "WRF and Deferral Updates" section of the Program Status Report tab of their reimbursement sheet. Similarly, progress updates on in-process dwellings listed on the deferral tracker should also be recorded in the same section of the Program Status Report.

Example: 123 Generic Ave: contacted a plumber to fix leak in pipes. Work to begin next week. Once a dwelling has moved from the deferred stage and an agency has completed full weatherization work, the agency must submit an updated entry for the dwelling on their next monthly tracker submission. The updated entry should now include:

- Date the dwelling became Weatherization ready.
- Date the dwelling was weatherized.
- The total remediation cost for each individual deferral reason.
- Amount of non-WAP funding used for each individual deferral reason (if applicable).
- Amount of WRF applied to each individual deferral reason (if applicable).

- Please note that the amount listed here should correspond with the submitted reimbursement request.

“Weatherization Readiness Fund” (WRF) – Guidelines, Rules, and Expectations for Management in NH

This section of the NH WAP PY24 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 reduce the number of deferrals of weatherization work by addressing the structural and health and safety issues that may cause deferral, thereby allowing those homes to move forward with a subsequent whole house weatherization retrofit.

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 on 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, because they cannot be addressed with WAP dollars, are preventing weatherization work in 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.
- When the required follow-on WAP-supported weatherization ECMs for that dwelling can be installed, and a WAP completion declared, within one year of the completion of the WRF work.

Distribution of WRF dollars in New Hampshire will be based on the existing WAP allocation formula and the PY24 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 WRF dollars 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 PY24 use of WRF by July 31, 2025, 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.

Reimbursement of WRF expenditures to Subgrantees from NH DOE will be made upon receipt by NH DOE of a properly completed monthly reimbursement request form showing the completion of WRF work. Reimbursement of WRF expenses need not wait for the subsequent weatherization retrofit to be completed. Subgrantees are reminded that WRF reimbursements come from the Annual WAP budget and must be submitted on the Annual WAP reimbursement request form, even if the WRF work was completed on a dwelling which will subsequently be weatherized using BIL WAP funds.

Monitoring of 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; a photographic record of these data points must be in the client file whenever appropriate to support the documentation being sought, including photos of the completed WRF work:

- Year built.
- Housing type (site-built single family, manufactured, multi-family).
- Nature of repairs needed which, if not addressed, prohibit weatherization. Where applicable, and when adequate funding is available, 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
- WRF expenditure per Annual WAP unit and building
- WRF expenditure per BIL WAP unit and building
- Leveraged fund expenditure per unit and building in this pre-weatherization phase (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 PY24 and to ensure that the data collected aligns with anticipated reporting requirements. **The NH Weatherization Technical Committee will be addressing the issue of deferrals over the course of PY24, 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 ignored, rather than identified and presented for correction prior to weatherization.

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 DOE) 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 DOE 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 PY24 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 PY24 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 US 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

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 \(nh.gov\)](https://www.nh.gov/energy/weatherization/policies-procedures-manual)

NH DOE is working at this writing, in PY23, to revise the NH WAP P&PM. It is expected that this revised edition, to be known as the 2024 edition, will become available at about the same time as the start of PY24, on July 1, 2024. NH DOE will provide that revised NH WAP P&PM to the US DOE as soon as it is available.

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.

At this writing, in PY23, minor pagination problems with the 2021 Field Guide are being corrected and NH DOE expects to do a second printing of the 2021 Field Guide prior to the start of PY24.

As was begun in PY15, NH Energy's PY24 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 of 10 CFR 440 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 DOE ensures compliance with the *Field Guide* as part of its monitoring of each Subgrantee.

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

All weatherization work is performed in accordance with the US DOE-approved energy audit procedures (in NH that is TREAT) and 10 CFR 440 Appendix A. Approval has been received from US 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.

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 and modeling software tool in NH for many years and is becoming dated, difficult to use, and lacking in support from the developer, PSD. Management personnel at the utility Home Energy Assistance (HEA) programs have, for a number of years, been considering a move to a newer modeling software, but no clear path has emerged. TREAT continues to be the modeling software of choice for both the HEA and the WAP weatherization work in NH for the foreseeable future. NH DOE will remain in close communication with HEA leadership, and we will plan to move together to a new modeling software when that is possible. We do not intend to put our Subgrantees in a situation, when collaborating with our utility program partners, that would require the use of two separate modeling software programs on the same project.

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 DOE as complete until a satisfactory final inspection has been performed. All final inspections in PY24 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 PY24. NH DOE is budgeting PY24 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 DOE's effort to ensure that all weatherization work completed in the state meets the standards and requirements of the SWS, NH DOE will continue the use of the following language in our PY24 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 PY24 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 DOE's monitoring of Subgrantees in PY24 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 WAP 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 PY24, 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 DOE 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 DOE 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 DOE's Weatherization Technical Specialist or his/her designee. In cases where deficiencies are noted, NH DOE 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 DOE will continue in PY24 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 DOE's staff or NH DOE'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 DOE has incorporated the standards and requirements of the Quality Work Plan into the way weatherization work is implemented and evaluated in New Hampshire.

NH DOE reviews Subgrantee job completion effectiveness during Quality Assurance Inspections (QAI) of dwelling unit weatherization projects, both in-progress and final. In PY24 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 DOE 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 DOE repeatedly identifies issues, then provides corrective on-site training, and subsequently observes further and continued ineffective work, NH DOE 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 DOE also requires formal contractor installation training, though no specific certification for installers is currently required. In PY24 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).

The New Hampshire Weatherization Assistance Program (WAP) has historically sought inclusivity and openness in its workforce recruitment and management practices. It has been active in seeking out enthusiastic and committed applicants, offering equal professional opportunities to individuals across a broad array of backgrounds, genders, sexual orientations, skin color, ages, and more. Recent years, however, have seen a significant shift. The emphasis on diversity, equity, inclusion, and accessibility (DEIA) has become more pronounced, drawing heightened awareness among leadership at both Grantee and Subgrantee levels in New Hampshire to the imperative of embracing an even wider array of diversity, achieving greater equity, and ensuring broader inclusion throughout the hiring spectrum. That embrace opens the doors for qualified people – who might not have felt welcome in the past – to join the workforce, thereby enlarging and strengthening the provider network while also improving that network’s ability to successfully address the mission of the Weatherization Assistance Program.

This evolving focus has not only deepened appreciation for the need to diversify the workforce but has also catalyzed an intensive effort to identify and engage qualified job candidates across all levels of employment within the WAP. This initiative is part of a broader movement to

scrutinize and evolve the NH WAP “culture,” aiming to further enrich the program’s commitment to DEIA.

Despite a history peppered with efforts to recruit and retain staff from diverse backgrounds, the continued prevalence of traditionally homogeneous workforce composition has underscored the urgent need for action. Now, more than ever, there is a push toward opening the program to a more diverse candidate pool. This means making equity and inclusion not just principles but core pillars of hiring and retention strategies for all roles.

As part of this commitment, the NH WAP has begun integrating DEIA into the monitoring process of its Subgrantees, encouraging them to develop and implement their own DEIA policies and plans at the agency level. This proactive approach has been met with positive responses as the Subgrantees work towards creating more inclusive work environments that reflect these values. Furthermore, NH Energy has played a pivotal role in supporting the Subgrantees’ submissions of two substantial WAP grants that incorporate DEIA commitments within a broader Community Benefits Plan. This demonstrates a tangible effort to weave these principles into the fabric of its operations.

This comprehensive approach to embedding DEIA with the WAP’s operational ethos signifies a new chapter for the program. It not only acknowledges the value of a diverse workforce but actively pursues it as a fundamental aspect of its mission to weatherize homes, reduce energy costs, and improve the quality of life for New Hampshire’s most vulnerable populations.

NH DOE 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 DOE 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 DOE 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 DOE is moving to improve program effectiveness in PY24:

- 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 recent staff expansion 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.

- Expanding and improving our Subgrantee monitoring effort, working to better connect monitoring outcomes with T&TA activities.
- Encouraging and supporting the two NH WAP Subgrantees which were each awarded a SERC grant in PY23; both proposals included planned time and resources for monitoring “realized savings” from the work installed.

V.7 Health and Safety Plan

The PY24 New Hampshire Annual WAP Health and Safety Plan is attached to the SF-424 as a separate document. 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 DOE therefore feels entirely comfortable in piggybacking on that utility program. NH DOE 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 DOE) 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 has moved 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 DOE 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 DOE undertakes a number of programs and activities. Financial support for these programs comes from federal grants and from the State's General Fund.

NH DOE 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 PY24, the allowable percentage of the NH WAP federal allocation which may be devoted to administrative expenditures is 15%. In accordance with 10 CFR 440.18(e), NH DOE retains no more than 7.5% of annual DOE WAP grant funds for administrative purposes. The administrative budget for NH DOE'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 DOE will distribute at least 7.5% of the PY24 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 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 DOE allows for the use of up to an additional 5% of that Subgrantee's budget (excluding carryover) to cover administrative costs. NH DOE uses the following procedure to allocate the additional administrative funding:

1. NH DOE subtracts 15% from the total new DOE PY24 grant to cover administrative expenses (7.5% for NH DOE and 7.5% for Subgrantees). NH DOE 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 PY24, as in prior years, NH DOE 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. PY24 will be the third and final year in the usual US DOE WAP award cycle and, therefore, unspent dollars from PY23 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 DOE determines that additional funds will be distributed due to changes in the NH DOE budget, those funds will be issued to the Subgrantees as Program funds and will not be combined with administrative funds except when NH DOE 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 PY23 (at this writing) are being completed using a combination of remote and on-site visit tools. A significant feature of the New Hampshire Subgrantee monitoring process is an electronic NH WAP Subgrantee monitoring questionnaire that is now in its fourth year of use, adapted specifically for NH WAP Subgrantees, and modified and revised over the years from experience. This questionnaire covers monitoring topics identified in both the US DOE's WPN 20-4 and WPN 22-4, and it forms the base from which other monitoring activities are conducted. The questionnaire and associated elements have been incorporated into the NH monitoring scheme for PY24 along with guidance from the "WAP Onsite Monitoring Checklist." The questionnaire includes two distinct sections, on program issues, and on technical issues. Fiscal issues are dealt with separately by the NH DOE Business Office and the agency's compliance staff. For PY24 we anticipate that the questionnaire will be sent to Subgrantees by early fall of 2024, with a return deadline prior to the Thanksgiving holiday. A sample questionnaire is attached to the SF-424 accompanying this PY24 WAP State Plan. PY24 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 PY24, 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 services 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.

PY21 saw us return to on-site monitoring visits to each Subgrantee, where activities include a thorough fiscal review, client file review, and scrutiny of final inspection reports and third-party Quality Assurance Inspection reports. 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 PY24 Subgrantee monitoring, NH Energy will further solidify and build upon the materials and processes developed since PY20 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 PY24, NH WAP will continue to partner with the NH DOE Business Office and the Department Compliance Officer to complete our WAP Subgrantee fiscal monitoring.

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.

The Subgrantee monitoring process is 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 must be used 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 DOE's) program management can be improved, such as by writing clearer policies and procedures.

NH DOE's program, technical, and financial monitoring of WAP Subgrantees is performed by NH DOE staff with outside assistance and input as needed. All monitoring activity is funded with WAP T&TA funds.

Beginning in Annual WAP23, with the advent of BIL funding for low-income weatherization work, NH DOE is monitoring Subgrantee management and oversight of both weatherization funding sources at the same time. We utilize both the Annual WAP staff and the BIL WAP staff, and both funding sources have now contracted with a program and monitoring specialist who is working under two contracts to provide monitoring services to NH DOE.

NH DOE has, for a number of years, also used a contractor to perform the US DOE-required technical "Quality Assurance Inspections" (QAI) of at least 10% of all completed annual WAP units in the state. For PY24, NH DOE will be working in the third year of a 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 DOE 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 DOE 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 DOE, 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 DOE 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 serving important quality management roles. Both the BTDIS and the Narrative Assessment Form are attached to the SF-424 associated with this PY24 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

The New Hampshire WAP T&TA activities are pivotal in enhancing the efficiency, quality, and effectiveness of the Weatherization Assistance Program at all tiers. These initiatives are formulated to boost energy savings, minimize production costs, refine program management, elevate installer work quality, and mitigate the risk of waste, fraud, abuse, and mismanagement. The primary beneficiaries of T&TA funds are the Subgrantees, who are directly allocated funds at the outset of the program year and benefit from the diligent monitoring and technical assistance provided by NH DOE. Moreover, NH DOE capitalizes on T&TA funds to augment the technical capabilities of the NH DOE WAP staff via contracting, supporting the monitoring of Subgrantee performance, and honing the program for optimized management and efficiency. The NH WAP PY24 T&TA Plan is devised to use limited discretionary funds to bridge the gaps in the broader BIL WAP T&TA framework, given the latter's approximately 50% increased funding per program year, facilitating additional training opportunities. The NH WAP PY24 T&TA complementary activities include:

- A Grantee provided course on Building Science Principles.
- Training on Heat Pump installation and inspection.

- TREAT energy modeling software training at three levels – beginner, intermediate, & advanced.
- Modules on health and safety are delivered via monthly WAP Network meetings.
- Modules on client education are delivered via monthly WAP Network meetings.

The NH WAP PY24 T&TA plan is designed to align seamlessly with the BIL WAP T&TA plan. This comprehensive approach ensures that both grant funds are utilized effectively, engaging the same Subgrantees and virtually identical subcontractors. The plan is engineered to provide training and technical assistance to personnel across all program levels and funding resources, ensuring a cohesive and efficient training delivery that maximizes the benefits for all participants.

This approach will provide Grantee-sponsored specific (Tier 2) T&TA opportunities and Subgrantee-sponsored comprehensive (Tier 1) T&TA opportunities with Annual Formula funds. In addition to similar Grantee-sponsored specific training, BIL WAP T&TA incorporates more comprehensive training with an emphasis on the NREL JTAs for each of the four Home Energy Professionals career positions. The training and assistance are tailored to keep WAP participants updated with the knowledge, skills, and abilities required to perform their tasks effectively. It also presents opportunities for improvement, job upgrades, and recognition as professionals over a recurring three-year rotation of training emphases.

Analysis of Training and Technical Assistance needs in New Hampshire: Training and Technical Assistance (T&TA) needs are determined through a variety of methods including:

- Subgrantee and Grantee ACSI Surveys
- US DOE Grantee monitoring
- US DOE WPNs and WPMs
- Subgrantee monitoring by NH DOE
- Monthly NH WAP meetings and conference calls
- Monthly Subgrantee/Grantee check-ins
- Desktop monitoring - includes reviewing and analyzing reimbursement requests, deferral tracking, WRF expenditures, and Health and Safety issues.
- NH WAP Technical Committee meetings
- Training event evaluations from participants
- Quality assurance (QA) inspection reports, which are completed on 10% of annually completed NH WAP-funded jobs.
- Subgrantee internal quality control inspections (QCIs), performed yearly on 100% of NH WAP-funded jobs.
- Information gained at conferences and collaboration with peers from other states.

The Annual Formula WAP collaborates with all WAP stakeholders to assess training needs and design activities to meet those needs. Our partnerships include:

- A QAI vendor with multiple BPI-certified QCIs is contracted to provide Quality Assurance Inspections and tutoring and mentoring services to subgrantees and subcontractors. This vendor also provides a QCI to chair the NH Weatherization Technical Committee, provides QAI services from which training recommendations

are made, and often conducts that training to improve the quality of observed fieldwork.

- A monitoring vendor with a Ph.D. in Resource Behavior and a subject matter expert on TREAT energy modeling software and energy conservation. This vendor is actively engaged in NH and through the Community College System on topics such as workforce development and contractor training and provides technical expertise to the NH WAP Network regarding Subgrantee monitoring, including workforce and training needs assessments.
- The ratepayer-funded State Utility Low-Income Weatherization Program. NH DOE works closely with the Utility program, which executes its mission primarily through the state community action agencies, which also serve as WAP Subgrantees. This close relationship enhances communication, surfaces mutually beneficial training needs, and provides additional braiding resources to serve clients in need.
- Trade and other associations. NH DOE is a member of NASCSP and the NH Residential Energy Performance Association (REPA). These organizations frequently offer valuable specific training and serve as additional resources to the NH WAP Network.
- The state community action agencies serving as WAP Subgrantees. The experienced and competent staff at the agencies complete our training needs assessment feedback loop. They are the people in the field, interacting with clients, contractors, and vendors. Their insights and observations are sought regularly to improve the program.

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 US 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 training)
- Heating Technicians, Electricians, and other positions without specific JTAs.

Competence in performing the tasks set out in these documents enables staff and contractors to meet the goals and requirements of the Federal WAP grants presented in this State Plan, the Policies and Procedures Manual, and the NH WAP Field Guide. As part of a multiyear T&TA plan, NH DOE leverages the Annual Formula and BIL WAP T&TA to jointly meet training needs and identify the relationships between T&TA needs and the JTA categories.

Workforce development: The opportunity to improve the energy efficiency of NH's housing stock is significant. Weatherization work continues to expand in New Hampshire because of federal (BIL WAP) and State-authorized (low-income utility program) funding increases. One of the most widely recognized and critical needs in the high-performance, energy-efficient

building arena in New Hampshire is the recruitment and training of workers up and down the range of positions necessary to grow a viable and productive weatherization program sustainably. NH DOE is committed to finding, employing, and training people to fill the critical roles required to meet the goals of our low-income weatherization programs.

NH DOE's combined Annual Formula and BIL WAP T&TA includes significant support for:

- Dedicating resources to align the Network T&TA resources available through the various low-income weatherization programs. This strategic approach, coordinated by a contracted BIL WAP vendor, will provide technical assistance and coordination on behalf of NH DOE to all Subgrantees and outreach to the utility WAP and the HER and HOMES programs, designed to integrate and leverage training and workforce development efforts across a broad range of stakeholders. The goal is to gain economies of scale, reduce redundancies, and coordinate a holistic training plan.
- Apprenticeship programs. One of our Subgrantees, the Tri-County Community Action Program, is successfully implementing a nationally approved Department of Labor apprenticeship program for weatherization installers. This program relies heavily on the NREL Badges program for related instruction, and NH DOE has created a T&TA wage subsidy policy for Subgrantee new hires with incentives for apprentices. Additionally, NH DOE is actively exploring a statewide Energy Auditor apprenticeship program, intending to have this in place by Q2 of PY24.
- Contractor training. In compliance with US DOE requirements, NH DOE has developed a Contractor Training and Stipend policy. The policy streamlines requests for contractor training and provides clear language on uses and limits.

These initiatives are designed to support the required training and credentialing of weatherization staff for the Home Energy Professionals positions, to include:

- Building Analyst Technician
- Building Analyst Professional
- Energy Auditor
- Quality Control Inspector
- Crew Chief

In addition to BPI certifications needed for WAP, other training and credentials required by NH DOE include:

- OSHA 10 – for all WAP workers (including contractors).
- OSHA 30 – for all WAP supervisors
- Lead-Safe Certification – for all WAP workers.

Per the NH WAP Policies and Procedures Manual, Subgrantees must train their staff and record the training and certifications in a database that NH DOE examines annually. NH DOE requires all Subgrantees to confirm that subcontractors working in WAP have the proper training and certifications. While staff are in training, NH DOE requires them to receive proper supervision and mentoring until credentials are achieved.

T&TA implementation and delivery: Leveraging the NH WAP PY24 T&TA and BIL WAP T&TA plans is the first step in a coordinated implementation and delivery effort. This first step utilizes funding from both programs to develop a single-year training plan (Annual Formula) that

bridges the gaps in the multi-year training plan (BIL WAP). The following steps will integrate Subgrantee, HERS/HOMES, and Utility WAP training plans with NH DOE training plans. This is detailed in the BIL WAP Request for Proposal for Training and Technical Assistance Coordinator, currently under development.

To better understand the leveraging that we intend and the gaps that the Annual Formula program is filling, here is a snapshot of the comprehensive training that BIL WAP will provide:

- Comprehensive, occupation-specific training that follows a curriculum aligned with the NREL’s Job Task Analysis (JTA) for:
 - Installer in PY24 and PY26
 - Energy Auditor and QCI in PY25
 - Crew Leader in PY26
 - Contractor Boot Camp in PY25
 - Implementation of the Badges program (budget permitting)

- Correspondingly, NH WAP PY24 T&TA will provide the following to bridge gaps and build out training opportunities:
 - A Grantee provided course on Building Science Principles.
 - Training on Heat Pump installation and inspection.
 - TREAT energy modeling software training at three levels – beginner, intermediate, & advanced.
 - Modules on health and safety are delivered via monthly WAP Network meetings.
 - Modules on client education, delivered via monthly WAP Network meetings.

Proposed training activities: The remaining specifics of the NH WAP PY24 T&TA plan are presented on the planning and tracking template attached to the SF-424. For ease of US DOE review, we have included the frequently mentioned BIL WAP sheet to reflect the close coordination of the two programs.

Procuring a WAP data management system: NH DOE issued an RFP for a data management system in PY23. The RFP proposal period closes on April 16, 2024. NH DOE anticipates having a system vendor by the start of PY24. However, the rollout for such programs is intensive and complex, and we understand that the system may take up to twelve months or more to be WAP functional and in use. This will also require extensive user training from the vendor, and the possibility of conflicts with WAP training cannot be dismissed.

Client education: NH DOE acknowledges that client education materials need improvement. In addition to pamphlets provided by federal agencies (Renovate Right, Radon, etc.), Subgrantees have created an assortment of client education materials, all well intended but need to be more consistent in the message. NH DOE plans to address this with the Network in PY24, aiming to form an ad hoc study committee to make recommendations.

Subgrantee use of T&TA funds: Subgrantees play a crucial role in the implementation and success of the Weatherization Assistance Programs, leveraging T&TA funds to enhance their capabilities, knowledge, and effectiveness. The use of T&TA funds by Subgrantees

encompasses a broad range of specific and comprehensive training opportunities, including educational, certifications, related energy technology training, and monitoring activities. Each is designed to elevate the quality and efficiency of weatherization services provided to low-income households. Below is a general overview of how Subgrantees utilize T&TA funds to achieve these objectives:

1. **Participation in the BPA National Home Performance Conference:** Subgrantees allocate a portion of T&TA funds to attend this premier conference, a pivotal learning and networking opportunity. The conference offers an array of educational sessions, workshops, and presentations on critical weatherization topics such as building science, technical updates, emerging technologies, and programmatic improvements. This engagement supports Subgrantee staff remaining at the forefront of industry developments and best practices.
2. **BPI Certifications.** Subgrantees invest in BPI certifications and continuing education for their energy auditors and QCIs to meet US DOE WAP requirements and improve the quality of the WAP program. These certifications reflect that staff possess the latest knowledge and skills in building analysis and quality assurance within the WAP. The NH WAP Policies and Procedures manual requires these certifications to produce official WAP completions for reimbursement. Certifications, including award and expiration dates, must be recorded and available for NH DOE inspection.
3. **Weatherization Installer Training:** T&TA funds support specialized training for weatherization installers, focusing on hands-on skills and techniques essential for effective and efficient home weatherization. This training covers various topics, from insulation techniques to advanced air sealing, and provides installers with the skills to deliver high-quality services and improve production.
4. **Contractor Training:** Recognizing the need for workforce development and as an enticement to subcontractors considering entry to WAP work, Subgrantees are permitted to use a portion of T&TA funds to provide targeted training for contractors. This training includes technical skills, project management, and customer service, aiming to enhance the overall quality of contracted work and meet the NH Field Guide and NREL SWS requirements. NH DOE allows each Subgrantee to use up to ten percent (10%) of its combined T&TA allocations (Annual Formula WAP and BIL WAP) for contractor training with prior approval from NH DOE. Subgrantees may exceed this amount by submitting a waiver request and receiving approval from NH DOE.
5. **Apprenticeship Training and Support:** To foster the next generation of weatherization professionals, Subgrantees may allocate funds towards apprenticeship programs. These programs require related instruction that combines classroom learning with on-the-job mentoring, offering a pathway for new entrants to gain the necessary skills and experience needed for a career in weatherization.
6. **Monitoring and Support Activities:** A portion of Subgrantee funds is dedicated to monitoring and support activities that gauge program compliance and effectiveness. This includes labor costs associated with:
 - a. Monthly weatherization network calls and monthly check-ins with NH DOE to discuss progress, challenges, and best practices.

- b. Desktop monitoring by NH DOE provides a remote review of Subgrantee activities and documentation.
- c. Monitoring site visits by NH DOE to evaluate fieldwork and provide on-site feedback and guidance.
- d. Attendance at NH DOE-provided training sessions offers additional learning opportunities and supports alignment with program goals and requirements.

Through the diverse use of T&TA funds, Subgrantees enhance their operational capabilities and contribute to the state program's overarching goals: improving home energy efficiency, reducing energy costs for low-income families, and ensuring residents' health and safety. This investment underscores the commitment of US DOE, Grantees, and Subgrantees to deliver high-quality, effective weatherization services across the country.

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 PY24 STATE PLAN.