# State of California

Department of Community Services and Development

# Weatherization Assistance Program for Low-Income Persons



# DRAFT 2025 State Plan and Application to the U.S. Department of Energy

Gavin Newsom Governor State of California Kim Johnson Secretary California Health and Human Services Agency Jason Wimbley
Director
Department of Community
Services and Development

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### **Attachments**

Specific attachments to the State Plan may be requested by submitting a Public Records Act Request. Visit CSD's public website for instructions on how to make the request.

- A. Certification Regarding Lobbying
- B. DOE Nondiscrimination Declaration
- C. Explanation of Indirect Costs
- D. Carryover Explanation
- E. Notices of Public Hearing
- F. Public Hearing Transcript
- G. CSD Eligibility and Verification Guide
- H. CSD Health and Safety Plan
- I. WPN 22-4 Quality Work Plan
- J. State Historic Preservation Officer Declaration
- K. PAC Hearing Transcript
- L. CSD Organizational Chart
- M. State Administrative Manual
- N. CSD Cost Allocation Plan
- O. State of California A-133 Audit
- P. CSD Training and Technical Assistance Plan
- Q. CSD Weatherization Technical Reference Manual
- R. California Energy Commission Climate Zones by County and City
- S. California Energy Commission Climate Zone Map
- T. DOE Weatherization Priority Plan Narrative
- U. PAC Represented Interest
- V. CSD WRF Fact Sheet
- W. CSD WRF Client Consent Form
- X. DOE WAP Measure Matrix
- Y. 2024 Desk Review Questionnaire
- Z. 2024 Monitoring Questionnaire
- AA. Dispute Resolution Process
- AB. Investigating Fraud, Waste and Abuse

OMB Number: 4040-0004 Expiration Date: 11/30/2025

APPLICATION FOR FEDERAL ASSISTANCE SF	-424		Version 02	
Type of Submission:     Preapplication     Application     Changed/Corrected Application	2. Type of Application:     X New     Continuation     Revision			
3. Date Received	-	4. Applicant Identifier:		
5a. Federal Entity Identifier:		5b. Federal Award Identifier: DE-SE0001811		
State Use Only:				
6. Date Received by State:		7. State Application Identifier:		
8. APPLICANT INFORMATION:				
a. Legal Name: State of California				
b. Employer/Taxpayer Identification Number (EIN/TIN): 680283471		c. UEI: F4LGDJEVBFK4		
d. Address:				
Street 1: 2389 Gateway Oaks				
Street 2:				
City: Sacramento				
County: SACRAMENTO County	SACRAMENTO County			
State: CA				
Province:				
Country: U.S.A.	ountry: U.S.A.			
Zip / Postal Code: 958120000				
e. Organizational Unit:				
Department Name:		Division Name:		
Department of Community Services and Development		Energy and Environmental Services		
f. Name and contact information of person to be contacted	on matters involving this	application:		
Prefix: Mr First Na	me: Jason			
Middle Name:				
Last Name: Wimbley				
Suffix:				
Title: Director				
Organizational Affiliation: California Department of Community Services and Development				
Telephone Number: 916-576-7109 Fax Number: 916-263-1406				
Email: jason.wimbley@csd.ca.gov				

OMB Number: 4040-0004 Expiration Date: 11/30/2025

APPLICATION FOR FEDERAL ASSISTANCE SF-424	Version 02
9. Type of Applicant:	
A State Government	
0. Name of Federal Agency:	
U. S. Department of Energy	
1. Catalog of Federal Domestic Assistance Number:	
81.042	
CFDA Title:	
Weatherization Assistance Program for Low-Income Persons	
2. Funding Opportunity Number:	
DE-WAP-0002025	
Title:	
2025 Weatherization Assistance Program (WAP) Funding	
3. Competition Identification Number:	
Title	
Title:	
14. Areas Affected by Project (Cities, Counties, States, etc.):	
State of California	
15. Descriptive Title of Applicant's Project:	
The Weatherization Assistance for Low Income Persons enables low-income families to permanently reduce their energy bills by making their	
homes more energy efficient.	

OMB Number: 4040-0004 Expiration Date: 11/30/2025

APPLICATION FOR FEDERAL ASSISTANCE SF-424			Version 02
16.Congressional District Of:			
a. Applicant:	b. Program/Project:	CA-Statewide	
Attach an additional list of Program/Project Congressional Districts if needed:			
17. Proposed Project: a. Start Date: 07/01/2025	b. End Date:	06/30/2026	
18. Estimated Funding (\$):			
a. Federal 9,909,509.00			
b. Applicant 0.00			
c. State 0.00			
d. Local 0.00			
e. Other 0.00			
f. Program Income 0.00			
g. TOTAL 9,909,509.00			
19. Is Application subject to Review By State Under Executive Order 12372 Proces  a. This application was made available to the State under the Executive Order			
b. Program is subject to E.O. 12372 but has not been selected by the State for	review.		
X c. Program is not covered by E.O. 12372			
20. Is the applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation	n)		
No			
21. By signing this application, I certify (1) to the statements contained in the list of statements herein are true, complete and accurate to the best of my knowledge. I also provide to  I AGREE			
** The list of certifications and assurances, or an internet site where you may obtain tagency	his list, is contained in the a	nnouncement or	
Authorized Representative:			
Prefix: Mr First Name: Jason			
Middle Name:			
Last Name: Wimbley			
Suffix:			
Title: Director			
Telephone Number: 916-576-7109	Fax Number:		
Email: jason.wimbley@csd.ca.gov			
Signature of Authorized Representative:  Authorized for Local Reproduction		Date Signed:	Standard Form 424 (Revised 10/2005) Prescribed by OMB Circular A-102

# II. Budget Information

Program/Pro	ject Identification No.	Р	rogram/Project Title
S	E0001811	Weathe	rization Assistance Program
Name and Address  2389 Gateway Oaks Drive Sacramento, CA 95833		Project Dates	7/1/25 - 6/30/26

Section A - Budget Summary					
Grant Program Estimated Unobligated Funds (Federal) New/Revised Budget (Federal)					
DOE WAP 2025	-	9,909,509	9,909,509		
-		-	-		
Totals		9,909,509	9,909,509		

Section B - Budget Categories					
Object Class Categories	Grantee Administration	Subgrantee Administration	Grantee T&TA	Subgrantee T&TA	Total
Personnel	199,903		205,296		405,199
Fringe Benefits	93,962		96,570		190,532
Travel	8,300		8,940		17,240
Equipment	-		-		-
Supplies	-		-		-
Contractual	-	743,213	656,515	465,649	1,865,377
Construction	-		-		-
Other Direct Costs	-		1,156		1,156
Total Direct Costs	302,165	743,213	968,477	465,649	2,479,504
Indirect Costs	441,048		118,035		559,083
Totals	743,213	743,213	1,086,512	465,649	3,038,587

Object Class Categories	Program Operations	Health and Safety	Client Eligibility / Intake	Energy Audits	Total
Personnel					-
Fringe Benefits					-
Travel					-
Equipment					-
Supplies					-
Contractual	4,551,752	889,924	135,000	222,000	5,798,676
Construction					-
Other Direct Costs					-
Total Direct Costs	4,551,752	889,924	135,000	222,000	5,798,676
Indirect Costs					-
Totals	4,551,752	889,924	135,000	222,000	5,798,676

Section B - Budget Categories					
Object Class Categories	Final Inspections	Liability Insurance	Vehicles & Equipment	Weatherization Readiness Funds	Total
Personnel					-
Fringe Benefits					-
Travel					-
Equipment					-
Supplies					-
Contractual	72,000	125,000	-	875,246	1,072,246
Construction					-
Other Direct Costs					-
Total Direct Costs	72,000	125,000	-	875,246	1,072,246
Indirect Costs					-
Totals	72,000	125,000	-	875,246	1,072,246

All budget estimations are based upon historical data incurred under previous grants. Annual LIHEAP grant, DOE BIL grant and other energy programs administered by CSD are leveraged to fund wages, benefits, and other program expenditures for the annual DOE grant.

# III. Budget Explanation

# Personnel

# <u>Duties</u>

Positions to be supported under the proposed award and brief descriptions of the duties of

Position	Description of Duties
Energy and Environmental Services Division - Staff	Manager provides staff supervision and
Services Manager III	oversees the Energy Division.
Energy and Environmental Services Division - Assoc. Govt. Program Analyst	Analyst provides analytical and policy development support to the Staff Services Manager III.
Weatherization & Technical Support and Climate Investment Units - Staff Services Manager II	Manager provides staff supervision and oversees the Weatherization & Technical Support and Climate Investment Units.
Weatherization & Technical Support and Climate Investment Units - Staff Services Manager I Specialist (Retired Annuitant)	Manager Specialist provides analytical and staff support, and staff training for DOE program.
Weatherization & Technical Support and Climate Investment Units - Research Program Specialist I	Specialist provides higher level technical and analytical support and training to Subgrantees and departmental staff.
DOE WAP Unit - Staff Services Manager I	Manager provides staff supervision and administers departmental policies and programs. Oversees all DOE grants, manages energy audit processes, and ongoing implementation and maintenance of LMS. Primary liaison to DOE.
DOE WAP Unit - Assoc. Govt. Program Analyst	Analyst provides technical and analytical support to departmental staff. Helps in the development of policies, standards, contracts, and DOE program guidance and LMS maintenance.
DOE WAP Unit - Assoc. Govt. Program Analyst	Analyst provides technical and analytical support to departmental staff. Helps in the development of policies, standards, contracts, and DOE program guidance and LMS maintenance.
DOE WAP Unit - Assoc. Govt. Program Analyst - Assoc. Govt. Program Analyst (Limited Term)	Analyst provides technical and analytical support to departmental staff. Helps in the development of policies, standards, contracts, and DOE program guidance and database upgrades.

Position	Description of Duties
Energy Technical Unit - Staff Services Manager I	Manager performs oversight of the QA monitoring provided by third-party inspection contractor, oversees separate QA inspections performed by Grantee staff, oversight of energy audit reviews and technical standards development.
Energy Technical Unit - Assoc. Govt. Program Analyst	Analyst performs field monitoring of the third- party inspection contractor and separate QA inspections of Subgrantees, support of technical hotline and development of technical manuals.
Energy Technical Unit - Assoc. Govt. Program Analyst	Analyst provides technical and analytical support and training to Subgrantees and departmental staff and oversight of weatherization customer complaints.
Energy Technical Unit - Assoc. Govt. Program Analyst	Analyst performs field monitoring of the third- party inspection contractor and separate QA inspections of Subgrantees, support of technical hotline and development of technical manuals.
Climate Investment/Energy Reporting Unit - Staff Services Manager I	Manager performs oversight of complex technical and IT coordination services in support of weatherization and utility assistance programs.
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	Analyst provides complex technical and IT coordination services in support of weatherization and utility assistance programs.
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	Analyst provides complex technical and IT coordination services in support of weatherization and utility assistance programs.
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	Analyst provides complex technical and IT coordination services in support of weatherization and utility assistance programs.
Field & Weatherization Services and Consumer Provider Assistance Units - Staff Services Manager II	Manager provides staff supervision and oversees the Consumer Provider Assistance and Field & Weatherization Services Units.
Field & Weatherization Services and Consumer Provider Assistance Units - Associate Govt. Program Analyst	Analyst develops contracts for all programs in the Division, oversees the historic preservation tracking website and other projects as assigned for the weatherization programs.

Position	Description of Duties
Field & Weatherization Services and Consumer Provider Assistance Units - Associate Govt. Program Analyst	Analyst performs DOE contracts, provide weatherization database support, and conduct Subgrantee payment reconciliation.
Field & Weatherization Services Unit - Staff Services Manager I	Manager provides staff supervision and oversight of the monitoring of Subgrantees.
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	Analyst performs day-to-day program administration, reviews fiscal and programmatic data reports, conducts annual monitoring activities and program analysis for monitoring purposes.
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	Analyst performs day-to-day program administration, reviews fiscal and programmatic data reports, conducts annual monitoring activities and program analysis for monitoring purposes.
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Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	Analyst performs day-to-day program administration, reviews fiscal and programmatic data reports, conducts annual monitoring activities and program analysis for monitoring purposes.

Position	Description of Duties
Field & Weatherization Services Unit - Staff Services Analyst	Analyst provides administrative and programmatic support to the Field & Weatherization Services Unit.
Consumer Provider Assistance Unit - Staff Services Manager I	Manager provides staff supervision and oversight of the support services for CSD staff and Subgrantees.
Consumer Provider Assistance Unit - Assoc. Govt. Program Analyst	Analyst performs review of DOE contracts, provides weatherization database support, and conducts Subgrantee payment reconciliation.
Consumer Provider Assistance Unit - Assoc. Govt. Program Analyst	Analyst performs review of DOE contracts, provides weatherization database support, and conducts Subgrantee payment reconciliation.
Consumer Provider Assistance Unit - Staff Services Analyst	Analyst performs review of DOE contracts, provides weatherization database support, and conducts Subgrantee payment reconciliation.
Consumer Provider Assistance Unit - Staff Services Analyst	Analyst performs review of DOE contracts, provides weatherization database support, and conducts Subgrantee payment reconciliation.
Consumer Provider Assistance Unit - Supervisor Program Tech II	Manager provides staff supervision and oversight of the support services for Customer Call Center.
Consumer Provider Assistance Unit - Program Tech II	Technician provides call-in support services for weatherization client base.
Consumer Provider Assistance Unit - Program Tech II	Technician provides call-in support services for weatherization client base.
Consumer Provider Assistance Unit - Program Tech	Technician provides call-in support services for weatherization client base.
Consumer Provider Assistance Unit - Program Tech	Technician provides call-in support services for weatherization client base.
Consumer Provider Assistance Unit - Program Tech	Technician provides call-in support services for weatherization client base.
Consumer Provider Assistance Unit - Program Tech	Technician provides call-in support services for weatherization client base.
Consumer Provider Assistance Unit - Program Tech	Technician provides call-in support services for weatherization client base.

Position	Description of Duties
Consumer Provider Assistance Unit - Program Tech	Technician provides call-in support services for weatherization client base.
Consumer Provider Assistance Unit - Program Tech	Technician provides call-in support services for weatherization client base.

# **Direct Personnel Compensation**

Position	Salary	Time	Dir	ect Pay
Energy and Environmental Services Division - Staff Services Manager III	\$ 126,600	10.08%	\$	12,761
Energy and Environmental Services Division - Assoc. Govt. Program Analyst	\$ 78,144	2.00%	\$	1,563
Weatherization & Technical Support and Climate Investment Units - Staff Services Manager II	\$ 113,952	33.00%	\$	37,604
Weatherization & Technical Support and Climate Investment Units - Staff Services Manager I Specialist (Retired Annuitant)	\$ 48,168	24.00%	\$	11,560
Weatherization & Technical Support and Climate Investment Units - Research Program Specialist I	\$ 98,472	10.00%	\$	9,847
DOE WAP Unit - Staff Services Manager I	\$ 103,800	28.00%	\$	29,064
DOE WAP Unit - Assoc. Govt. Program Analyst	\$ 87,924	24.00%	\$	21,102
DOE WAP Unit - Assoc. Govt. Program Analyst	\$ 81,300	32.00%	\$	26,016
DOE WAP Unit - Assoc. Govt. Program Analyst - Assoc. Govt. Program Analyst (Limited Term)	\$ 81,300	32.00%	\$	26,016
Energy Technical Unit - Staff Services Manager I	\$ 103,800	29.00%	\$	30,102
Energy Technical Unit - Assoc. Govt. Program Analyst	\$ 87,924	30.00%	\$	26,377
Energy Technical Unit - Assoc. Govt. Program Analyst	\$ 87,924	10.00%	\$	8,792
Energy Technical Unit - Assoc. Govt. Program Analyst	\$ 85,380	15.00%	\$	12,807
Climate Investment/Energy Reporting Unit - Staff Services Manager I	\$ 103,800	10.00%	\$	10,380
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	\$ 81,300	10.00%	\$	8,130
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	\$ 81,300	10.00%	\$	8,130

# <u>Direct Personnel Compensation - continued</u>

Position	Salary	Time	Dir	ect Pay
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	\$ 81,300	10.00%	\$	8,130
Field & Weatherization Services and Consumer Provider Assistance Units - Staff Services Manager II	\$ 113,952	5.15%	\$	5,869
Field & Weatherization Services and Consumer Provider Assistance Units - Associate Govt. Program Analyst	\$ 81,300	5.00%	\$	4,065
Field & Weatherization Services and Consumer Provider Assistance Units - Associate Govt. Program Analyst	\$ 87,924	5.00%	\$	4,396
Field & Weatherization Services Unit - Staff Services Manager I	\$ 101,784	10.00%	\$	10,178
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$ 77,580	10.00%	\$	7,758
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$ 77,544	10.00%	\$	7,754
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$ 87,924	10.00%	\$	8,792
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$ 73,764	10.00%	\$	7,376
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$ 73,764	10.00%	\$	7,376
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$ 73,764	10.00%	\$	7,376
Field & Weatherization Services Unit - Staff Services Analyst	\$ 61,332	10.00%	\$	6,133
Consumer Provider Assistance Unit - Staff Services Manager I	\$ 96,948	4.00%	\$	3,878
Consumer Provider Assistance Unit - Assoc. Govt. Program Analyst	\$ 81,300	8.00%	\$	6,504
Consumer Provider Assistance Unit - Assoc. Govt. Program Analyst	\$ 87,924	8.00%	\$	7,034
Consumer Provider Assistance Unit - Staff Services Analyst	\$ 73,116	8.00%	\$	5,849
Consumer Provider Assistance Unit - Staff Services Analyst	\$ 73,116	8.00%	\$	5,849
Consumer Provider Assistance Unit - Supervisor Program Tech II	\$ 67,584	2.00%	\$	1,352

# **Direct Personnel Compensation - continued**

Position	S	alary	Time	Di	rect Pay
Consumer Provider Assistance Unit - Program Tech II	\$	56,568	2.00%	\$	1,131
Consumer Provider Assistance Unit - Program Tech II	\$	56,568	2.00%	\$	1,131
Consumer Provider Assistance Unit - Program Tech	\$	52,512	2.00%	\$	1,050
Consumer Provider Assistance Unit - Program Tech	\$	52,512	2.00%	\$	1,050
Consumer Provider Assistance Unit - Program Tech	\$	45,576	2.00%	\$	912
Consumer Provider Assistance Unit - Program Tech	\$	52,512	2.00%	\$	1,050
Consumer Provider Assistance Unit - Program Tech	\$	52,512	2.00%	\$	1,050
Consumer Provider Assistance Unit - Program Tech	\$	42,660	2.00%	\$	853
Consumer Provider Assistance Unit - Program Tech	\$	52,356	2.00%	\$	1,047
Total Direct Personnel Compensation				\$	405,199

# Fringe Benefits

The fringe benefit rate is based upon actual percentages used to pay for benefits of all State employees. The total amount of fringe benefits is calculated based upon a prorated amount of the annual salary of each classification that is attributable to DOE activities.

Benefit	Rate
Retirement	26.31%
Payroll Taxes – OASDI	6.20%
Payroll Taxes - Medicare	1.45%
Medical Insurances	14.40%
Total Fringe Benefit Rate	48.36%
Total Fringe Benefit Rate - Retired Annuitants (Medicare)	1.45%

Position	В	enefit
Energy and Environmental Services Division - Staff Services Manager III	\$	6,171
Energy and Environmental Services Division - Assoc. Govt. Program Analyst	\$	756
Weatherization & Technical Support and Climate Investment Units - Staff Services Manager II	\$	18,185
Weatherization & Technical Support and Climate Investment Units - Staff Services Manager I Specialist (Retired Annuitant)	\$	168

# Fringe Benefits - continued

Position	В	Benefit
Weatherization & Technical Support and Climate Investment Units - Research	\$	4 762
Program Specialist I	<b>—</b>	4,762
DOE WAP Unit - Staff Services Manager I	\$	14,055
DOE WAP Unit - Assoc. Govt. Program Analyst	\$	10,205
DOE WAP Unit - Assoc. Govt. Program Analyst	\$	12,581
DOE WAP Unit - Assoc. Govt. Program Analyst - Assoc. Govt. Program Analyst (Limited Term)	\$	12,581
Energy Technical Unit - Staff Services Manager I	\$	14,557
Energy Technical Unit - Assoc. Govt. Program Analyst	\$	12,756
Energy Technical Unit - Assoc. Govt. Program Analyst	\$	4,252
Energy Technical Unit - Assoc. Govt. Program Analyst	\$	6,193
Climate Investment/Energy Reporting Unit - Staff Services Manager I	\$	5,020
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	\$	3,932
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	\$	3,932
Climate Investment/Energy Reporting Unit - Assoc. Govt. Program Analyst	\$	3,932
Field & Weatherization Services and Consumer Provider Assistance Units - Staff Services Manager II	\$	2,838
Field & Weatherization Services and Consumer Provider Assistance Units - Associate Govt. Program Analyst	\$	1,966
Field & Weatherization Services and Consumer Provider Assistance Units - Associate Govt. Program Analyst	\$	2,126
Field & Weatherization Services Unit - Staff Services Manager I	\$	4,922
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$	3,752
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$	3,750
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$	4,252
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$	3,567
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$	3,567
Field & Weatherization Services Unit - Assoc. Govt. Program Analyst	\$	3,567
Field & Weatherization Services Unit - Staff Services Analyst	\$	2,966
Consumer Provider Assistance Unit - Staff Services Manager I	\$	1,875
Consumer Provider Assistance Unit - Assoc. Govt. Program Analyst	\$	3,145
Consumer Provider Assistance Unit - Assoc. Govt. Program Analyst	\$	3,402
Consumer Provider Assistance Unit - Staff Services Analyst	\$	2,829
Consumer Provider Assistance Unit - Staff Services Analyst	\$	2,829
Consumer Provider Assistance Unit - Supervisor Program Tech II	\$	654
Consumer Provider Assistance Unit - Program Tech II	\$	547
Consumer Provider Assistance Unit - Program Tech II	\$	547
Consumer Provider Assistance Unit - Program Tech	\$	508
Consumer Provider Assistance Unit - Program Tech	\$	508
Consumer Provider Assistance Unit - Program Tech	\$	441
Consumer Provider Assistance Unit - Program Tech	\$	508

# Fringe Benefits - continued

Position	E	Benefit
Consumer Provider Assistance Unit - Program Tech	\$	508
Consumer Provider Assistance Unit - Program Tech	\$	413
Consumer Provider Assistance Unit - Program Tech	\$	506
Total Fringe Benefits	\$	190,532

# Travel

Purpose of Trip	Number of Trips	Co	erage st per Frip	Total
NASCSP Training Conferences and Meetings (Out- of-State) Fall 20253 through Winter 2026 (Biannual)	6	\$	2,480	\$ 14,880
CSD Staff Training - Energy Training Center - Duct/Shell Sealing	1	\$	190	\$ 190
CSD Staff Training - Energy Training Center - Combustion Appliance Safety	1		250	250
Onsite Subgrantee Comprehensive Monitoring (Air Travel)	4		130	520
Onsite Subgrantee Comprehensive Monitoring (Ground Travel)	20		60	1,200
Third Party Inspector Monitoring (Ride Along) (Air Travel)	2		40	80
Third Party Inspector Monitoring (Ride Along) (Ground Travel)	4		30	120
Total Travel				\$ 17,240

All budget estimations are based upon historical data incurred under previous grants. Travel costs for all monitoring and training are leveraged with the DOE BIL and other weatherization programs.

# **Contracts and Subgrants**

Name of Proposed Sub	Basis of Cost	Total Cost
Weatherization Service Providers (Subgrantees)	Net allocation after Grantee Admin and T&TA. Cost basis - Allocated at funding level requested by participating Subgrantees. Refer to Annual Section File IV.1 Subgrantees for allocation breakdown.	\$ 8,079,783

# Contracts and Subgrants - continued

Name of Proposed Sub	Basis of Cost	Total Cost
Technical Consultant – TBD	Provide technical assistance and training to CSD and Subgrantees as assigned. Cost basis – Competitive bid contract (new contract) Leveraged with DOE BIL, LIHEAP and other energy programs	\$ 336,111
Third Party Inspections - ConSol	Conduct weatherized unit inspections and reinspections on behalf of CSD Cost basis - Competitive bid contract Leveraged with DOE BIL, LIHEAP and other energy programs	\$ 78,000
SHPO Reviews - TBD	Conduct full SHPO reviews of assessed dwellings, quarterly reporting, directed analysis and project management & meetings Cost basis – Competitive bid contract (new contract) Leveraged with DOE BIL, LIHEAP and other energy programs	\$ 90,420
Learning Management System - S&P Technology Solutions/Latitude	Support of LMS system for CSD Training Program Cost basis - Initial competitive bid contract, month-to-month after implementation Leveraged with DOE BIL, LIHEAP and other energy programs	\$ 15,620

# Contracts and Subgrants - continued

Name of Proposed Sub	Basis of Cost	To	otal Cost
Learning Management System - TBD	Development of new and more robust LMS system for CSD Training Program to replace current system Cost basis - Competitive bid contract (new contract) Leveraged with DOE BIL, LIHEAP and other energy programs	\$	136,364
Total Contracts and Subgrants			8,736,298

# **Other Direct Costs**

Description	Justification	Total	Cost
Conference Fees - NASCSP	CSD Staff attendance at conferences in Fall 2025 and Winter 2026 Weatherization Training Conferences 1 attendee per conference Cost Basis - established registration fees	\$	660
Training Fees - PG&E Energy Training Center	CSD staff attendance at PG&E Energy Training Center for weatherization training - Combustion Appliance Safety and Duct and Shell Sealing. 4 attendees per training. Cost Basis - established registration fees Costs are shared with DOE BIL, LIHEAP and other energy programs.	\$	496
Total Other Direct Costs		\$	1,156

# **Indirect Costs**

Refer to Attachment C – Indirect Cost Rate.

# IV.1 Subgrantees

Subgrantee and Service Area	Planned Funds	Estimated Units
Amador-Tuolumne Community Action Agency (Amador, Calaveras, Tuolumne)	\$ 56,707	4
Campesinos Unidos, Inc. (Imperial, San Diego - Area A)	\$ 305,742	15
Central Coast Energy Services (Marin, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz)	\$ 1,361,590	90
Central Valley Opportunity Center, Inc. (Stanislaus)	\$ 284,376	21
Community Action Agency of Butte County, Inc. (Butte)	\$ 134,375	10
Community Action Partnership of Kern County (Kern)	\$ 50,000	4
Community Action Partnership of Orange County (Orange)	\$ 654,675	41
Community Action Partnership of Riverside County (Riverside)	\$ 192,627	9
Community Action Partnership of San Bernardino County (San Bernardino)	\$ 281,525	18
Community Action Partnership of San Luis Obispo County, Inc. (San Luis Obispo)	\$ 213,601	14
Community Resource Project, Inc. (Sacramento, Sutter, Yuba)	\$ 682,359	45
Community Services & Employment Training (Tulare)	\$ 199,017	15
Fresno County Economic Opportunities Commission (Fresno)	\$ 84,462	5
Glenn County Human Resource Agency (Colusa, Glenn, Trinity)	\$ 91,168	5
Great Northern Services (Siskiyou)	\$ 38,353	3
Kings Community Action Organization, Inc. (Kings)	\$ 156,166	12
Long Beach Community Action Partnership (Los Angeles - Area C)	\$ 393,897	27
Maravilla Foundation (Los Angeles - Area A)	\$ 933,076	59
Merced County Community Action Agency (Madera, Merced)	\$ 1,024,465	70

# IV.1 Subgrantees

Subgrantee and Service Area	Planned Funds	Estimated Units
Metropolitan Area Advisory Committee (San Diego - Area B)	\$ 351,372	24
North Coast Energy Services (Lake, Mendocino, Napa, Solano, Sonoma, Yolo)	\$ 63,414	4
Pacific Asian Consortium in Employment (Los Angeles - Area B)	\$ 125,557	9
Redwood Community Action Agency (Humboldt, Modoc)	\$ 50,000	4
San Joaquin Co. Dept. of Aging & Community Services (Stanislaus)	\$ 186,774	14
Self Help Home Improvement Project (Shasta, Tehama)	\$ 114,485	7
Community Action of Ventura County (Ventura)	\$ 50,000	4
Total	\$ 8,079,783	533

# **IV.2 WAP Production Schedule**

Weatherization Plans	Annual Total
Total Units (excluding reweatherized)	533
Reweatherized Units	-

Avera	Average Unit Costs, Units Subject to DOE Project Rules			
Vehic	le & Equipment Average Cost per Dwelling Unit (DOE Rules)			
Α.	Total of Vehicles and Equipment Budget		-	
В.	Total Units to be Weatherized, from Production Schedule above		533	
C.	Units to be Reweatherized, from Production Schedule above		-	
D.	Total Units to be Weatherized, plus Planned Reweatherized Units from Production Schedule above (B plus C)		533	
E.	Average Vehicles and Equipment cost per Dwelling Unit (A divided by D)		-	
Avera	Average Cost per Dwelling Unit (DOE Rules)			
F.	Total of Funds for Program Operations	\$	4,551,752	
G.	Total Units to be Weatherized, plus Planned Reweatherized Units from Production Schedule above (total from D above)		533	
Н.	Average Cost per Dwelling Unit, less Vehicles and Equipment (F divided by G)	\$	8,540	
I.	Average Cost per Dwelling Unit for Vehicles and Equipment (total from E)	\$	-	
J.	Total Average Cost per Dwelling Unit (H plus I)	\$	8,540	

# IV.3 Energy Savings

Method used to calculate savings: DOE Algorithm

	Units	Savings Calculator (Mbtus)	Energy Savings
This Year Estimate	533	29.3	15,617
Prior Year Estimate	895	29.3	26,224
Prior Year Actual	678	29.3	19,865

# IV.4 DOE-Funded Leveraging Activities

CSD has no planned DOE-funded leveraging activities this year.

# IV.5 Policy Advisory Council Members

CSD has targeted organizations that are members of the Community Services Block Grant (CSBG)
Committee to increase participation from non-DOE service providers. Membership includes several organizations that are independent from the DOE WAP Subgrantee network. Not all members of PAC are CSBG service providers. The membership is currently made up of a diverse cross-section of sixty-two organizations.

Agency
Amador-Tuolumne Community Action Agency
Berkeley, City of
California Human Development Corporation
Campesinos Unidos, Inc.
Center for Employment Training
Central Valley Opportunity Center, Incorporated
Community Action Agency of Butte County, Inc.
Community Action Agency/Housing Authority of Tehama County
Community Action Board of Santa Cruz County, Inc.
Community Action Commission of Santa Barbara County
Community Action Marin
Community Action of Napa Valley
Community Action of Ventura County, Inc.
Community Action Partnership of Kern
Community Action Partnership of Madera County, Inc.
Community Action Partnership of Orange County
Community Action Partnership of San Bernardino County
Community Action Partnership of San Luis Obispo County, Inc.
Community Action Partnership of Solano, JPA
Community Action Partnership of Sonoma County
Community Services & Employment Training, Inc.
Contra Costa, County of
County of Los Angeles (DPSS)
County of Mariposa (Calaveras-Mariposa Community Action Agency)
County of Nevada
Del Norte Senior Center, Inc.
El Dorado, County of
Foothill Unity Center, Inc.
Fresno County Economic Opportunities Commission
Glenn County Human Resource Agency
Inyo Mono Advocates for Community Action, Inc.
Karuk Tribe
Kings Community Action Organization, Inc.
Long Beach Community Action Partnership

# IV.5 Policy Advisory Council Members

Agency
Los Angeles, City of
Los Angeles, County of Arts & Culture
Merced County Community Action Board
Modoc Siskiyou Community Action Agency
Monterey, County of
North Coast Opportunities, Inc.
Northern California Indian Development Council, Inc.
Oakland, City of
Plumas, County of
Project GO, Inc.
Proteus, Inc.
Redwood Community Action Agency
Riverside, County of
Sacramento Employment and Training Agency
Sacred Heart Community Service
San Benito, County of
San Diego, County of
San Joaquin, County of
San Mateo, County of
County of Shasta, A Political Subdivision of the State of California
Sutter County Community Action Agency
Urban Services YMCA (Young Men's Christian Assn. S.F.)
Yolo, County of
Yuba, County of

# IV.6 Public Hearing

The public hearing will be conducted virtually via webinar on Wednesday, April 24, 2025, at 10:00 a.m. PST by the California Department of Community Services and Development (CSD).

To register for the webinar, use the link below:

# Meeting Registration - Zoom

Notices for the hearing were posted on the CSD Public Website and social media platforms on April 14, 2025.

Comments for the State Plan will be accepted during the Public Hearing.

Attachment F: Public Hearing Transcripts will be available after the public hearing once approved by the U.S. Department of Energy.

# IV.7 Miscellaneous

## **Recipient Business Officer**

Kathy Andry
Branch Chief, Energy and Environmental Services Division
California Department of Community Services and Development
Kathy.Andry@csd.ca.gov

# **Recipient Principal Investigator**

Lizzie Adams
Unit Manager, Department of Energy Weatherization Unit
California Department of Community Services and Development
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## **Buy American**

The Build America Buy America Act ("Buy American Act") establishes a domestic procurement preference by requiring agencies to ensure applicable programs incorporate a Buy America preference in the terms and conditions of each award after May 14, 2022. The Buy America preference applies to federal financial assistance programs where funds are used for projects for "infrastructure," absent an exception. Infrastructure is defined in Section 70912(5) of the Infrastructure Investment and Jobs Act (also known as the Bipartisan Infrastructure Law) to include "the structures, facilities, and equipment for, in the United States, buildings and real property." As outlined in OMB M-22-11, which provides implementation guidance, the Buy America preference will not be a requirement on non-infrastructure projects.

Non-infrastructure projects consist solely of the "construction, or improvement of a private home for personal use." In the event that such an infrastructure project is undertaken, CSD will plan activities, such as ensuring any supplies of iron, steel, manufactured goods, or construction materials can certify, in writing, that their products are manufactured domestically.

### **Redistribution of Funds**

Funds may be reclaimed and redistributed to another Subgrantee(s) who has capacity to spend out for the following reasons:

- A Subgrantee cannot meet their contractual production and expenditure goals.
- A Subgrantee is not in compliance with program requirements or other extenuating circumstances.

- A Subgrantee has determined that DOE WAP funds are insufficient to administer and maintain WAP at the local level.
- A Subgrantee does not maintain the services of a certified Quality Control Inspector for the duration of the contract term.

Considerable efforts will be made to serve the affected service area, but it will be dependent upon the ability to secure an alternate Subgrantee for the remainder of the contract period.

# V.1 Eligibility

# V.1.1 Approach to Determining Client Eligibility

# Provide a description of the definition of income used to determine eligibility.

Income is defined as cash receipts earned and/or received by the dwelling occupant(s) before taxes within six weeks of the application intake date and must comply with the stated acceptable forms of income documentation referenced in Attachment G: CSD Eligibility and Verification Guide. Certain types of income are excluded from total household income including, but not limited to capital gains, non-cash benefits, employee fringe benefits, reverse mortgage, child support, and money received from the sale of a property, house, car, or tax refunds.

# Describe what household eligibility basis will be used in the Program.

Eligibility is based on the household's total monthly gross income, which cannot exceed the Department of Energy (DOE) Weatherization Assistance Program (WAP) income guidelines. CSD uses the federal poverty level of 200 percent as determined by the Office of Management and Budget as follows:

Household Size	DOE Monthly Income 200% Federal Poverty Effective 7/1/25
1	\$2,608
2	\$3,525
3	\$4,442
4	\$5,358
5	\$6,275
6	\$7,192
7	\$8,108
8	\$9,025
9	\$9,942
10	\$10,858
11	\$11,775
12	\$12,692
13	\$13,608
14	\$14,525
15	\$15,442
16	\$16,358
17	\$17,275
18	\$18,192

	DOE Monthly Income 200% Federal Poverty	
Household Size	Effective 7/1/25	
19	\$19,108	
20	\$20,025	
21	\$20,942	
22	\$21,858	
23	\$22,775	
24	\$23,692	
25	\$24,608	

Refer to Attachment G: CSD Eligibility and Verification Guide.

# Describe the process for ensuring qualified aliens are eligible for weatherization benefits.

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, H.R. 3734, also known as the Welfare Reform Act, placed specific restrictions on the eligibility of aliens for "federal public benefits," including on qualified aliens for "federal means-tested public benefits" for a period of five years. The Low Income Home Energy Assistance Program (LIHEAP) is identified as providing a "federal public benefit" which non-qualified aliens may not receive. (63 FR 41657.) As defined in a Federal Register notice dated August 26, 1997 (62 FR 45256), the Department of Health and Human Services (HHS) interpreted "federal means-tested public benefits" to include only those benefits provided under Federal means-tested, mandatory spending programs (e.g., only Medicaid and TANF for HHS programs). Accordingly, HHS Information Memorandum LIHEAP-IM 98-25 dated August 6, 1998, states that all qualified aliens, regardless of when they entered the U.S., continue to be eligible to receive assistance and services under LIHEAP if they meet other program requirements.

To ensure program continuity between LIHEAP and DOE weatherization for all Subgrantees operating both programs, the DOE WAP will follow the interpretation as adopted by HHS. Therefore, U.S. citizens and qualified aliens are eligible to apply for DOE WAP so long as they meet other program requirements (e.g., household income levels per the chart above). Additional program requirements are referenced in Attachment G: CSD Eligibility and Verification Guide.

In addition, LIHEAP IM 99-10, issued June 15, 1999, further clarifies that use of LIHEAP funds to weatherize a multi-unit building is not a benefit which is a federal public benefit. Therefore, weatherization in a multi-unit building is not a covered activity for status verification, meaning providers do not need to verify qualified alien or citizen eligibility.

# V.1.2 Approach to Determining Building Eligibility

# Procedures to determine that units weatherized have eligibility documentation.

Subgrantees utilize intake forms that include procedures to ensure units weatherized have eligibility documentation in accordance with CSD's Eligibility & Verification Guide (Attachment G). Subgrantees also maintain a client file for each unit weatherized, including documented proof that the dwelling unit is an eligible dwelling unit as defined in 10 CFR Section 440.22. This documented proof ensures a dwelling and its owner(s) meet eligibility requirements.

CSD created and provided an optional Client File Checklist to Subgrantees in July 2023, which assists Subgrantees with ensuring weatherized dwelling files contain all necessary eligibility and other documentation required by CSD-administered energy programs.

## Describe re-weatherization compliance.

Weatherization services for a dwelling unit previously weatherized using DOE WAP funds are only allowable if:

- A dwelling unit has been damaged by fire, flood, or act of nature and qualifies for disaster relief services in accordance with an approved DOE Disaster Relief Plan; or
- A dwelling unit has not been weatherized using Federal funds (DOE WAP, DOE ARRA, BIL WAP, LIHEAP, U.S. Department of Housing and Urban Development [HUD], or U.S. Department of Agriculture [USDA]) within 15 years of the date such previous weatherization was completed.

Each dwelling must receive a new dwelling assessment, diagnostic testing, and a determination as to whether the dwelling qualifies as a Priority List dwelling or requires an energy audit, which will consider any previous energy conservation improvements to the dwelling. Only feasible health and safety measures and energy conservation measures that qualify under the Priority List or for a dwelling where an energy audit was conducted at or above a savings-to-investment ratio (SIR) of 1.0 are allowable.

To confirm a dwelling's eligibility for DOE WAP, CSD has developed an automated system, the Address Verification and Earmarks System (AVES), that Subgrantees must check to ensure that the dwelling has not been weatherized using LIHEAP, DOE WAP, DOE ARRA, and/or BIL WAP funding during the prior 15 years. AVES was implemented in October 2023 and includes data on federal programs that CSD administers but does not include HUD or USDA data. Subgrantees must check a dwelling's address in AVES and verify that the household's income is within the program income eligibility guidelines before committing to providing re-weatherization services under DOE WAP.

## Describe what structures are eligible for weatherization.

The following structures are eligible for weatherization services:

Mobile or Manufactured Home – A manufactured home regulated by the California Department of Housing and Community Development (HCD) that is built on a trailer chassis and designed for highway delivery to a permanent location, and can be a single-, double-, or triple-wide home. A mobile home must be a permanent, full-time residential dwelling with a floor area of at least 330 square feet.

Multi-Family Dwelling Unit – A dwelling structure containing five or more dwelling units in a single building.

Shelter – A dwelling unit or units whose principal purpose is to house individuals on a temporary basis who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.

Single Family Dwellings – A detached dwelling structure containing no more than one dwelling unit, or two-to-four-unit buildings.

# Describe how rental units/multifamily buildings will be addressed.

CSD's subgrantee contracts shall ensure compliance with 10 CFR 440.22, WPN 22-12, and WPN 22-13. Enforcement will be assured via existing review and monitoring processes.

To ensure that the benefits of weatherization to occupants of rental units are protected, CSD's contracts require Subgrantees to assure that owners and renters receive equitable treatment under this program and no undue enhancements to the dwelling occur.

Language is included on all energy service agreement forms that prohibit property owners from raising rental prices within two years after services are provided because of building improvements from weatherization work, discloses tenant complaint procedures and property resale restrictions, and stipulates permission to enter the property for purposes of this program. The agreements are signed by the owner/occupants, tenants, and rental property owners prior to receiving weatherization services for the dwelling.

CSD has adequate procedures to process tenant complaints regarding any propertyowner violation of weatherization service agreement terms and conditions.

CSD will abide by 10 CFR Section 440.22, ensuring that not less than 66 percent of the units in multi-family buildings (50 percent for duplexes and four-unit buildings) are eligible units or will become eligible dwelling units within 180 days under a federal,

state, or local government program prior to rehabilitating the building or making similar improvements.

CSD follows guidance offered in WPN 22-5 that streamlines the qualification of certain HUD-assisted multifamily properties for weatherization work, streamlines income eligibility determination, and ensures that benefits accrue primarily to the low-income residents.

## Describe the deferral process.

Deferral takes place upon discovery of the infeasibility of a given measure or other issue causing the installation of weatherization measures to be deferred or omitted. This can be a full deferral of all services or partial deferral of one or more measures if a condition exists that presents a hazard or unsafe condition affecting the health and safety of workers or clients/occupants, and the condition is unable to be resolved within the service scope of WAP. If a condition is outside the service scope of WAP, the Weatherization Deferral Form (CSD 542), signed by the client, provides an area for Subgrantees to document the deferral condition and refer the client to other programs, agencies, or outside assistance, if the Subgrantee can identify appropriate contractors and/or other entities to assist the client. Only after the issues identified on the deferral form have been corrected to the satisfaction of the Subgrantee shall weatherization work begin. Further detail of deferral conditions is provided in:

- Attachment H: CSD Weatherization Health and Safety Plan
- Attachment Q: CSD Technical Reference Manual, Appendix E Health and Safety Requirements, Section 11.3 Deferral and Referral Policy

CSD currently collects data on units that have been provided only assessment and diagnostic services; however, the deferral condition, though captured on the CSD Weatherization Deferral Form, is not uploaded into CSD's current reporting system. Through new system enhancements, CSD is planning on data collection expansion, deferral form updates, and deferral process review to work towards a deferral tracking process that will allow for improved access to program services.

### Weatherization Readiness Funds (WRF)

To address deferral issues under the Annual 2024 DOE WAP, CSD will use the Weatherization Readiness Funds (WRF) as described below. These funds are to be used for DOE WAP jobs where deferral was initially required due to a condition beyond the regular weatherization program scope. These funds will allow the identified deferral condition to be corrected (within the limits of this guidance/plan) and for weatherization work to resume and result in a completed DOE WAP unit.

Through the DOE participation application process, Subgrantees request the amount of WRF funding they wish to receive and provide a per-unit estimate. Subgrantees are not required to accept WRF funding to participate in the annual DOE program.

# WRF Maximum Average Cost Per Unit

The maximum WRF average cost per unit (WRF ACPU) for Program Year 2024 is \$20,000. The maximum WRF ACPU is both separate and higher than the ACPU for weatherization services.

### **WRF Process**

Homes that have been previously deferred and maintaining eligibility for program services will be prioritized for WAP services. For all other WRF needs, Subgrantees must follow the same priority and ranking used for weatherization. Once it has been determined that WRF funds will be used on a dwelling, the Subgrantee must document the actions to be taken to make the dwelling ready for weatherization, the entity performing the actual work, and the cost of the work. Once the readiness work has been completed, the dwelling must immediately receive weatherization services and be documented as a DOE WAP unit.

### Restrictions on WRF

Any dwelling that receives WRF funding must result in a completed DOE unit. If WRF funds are used on a dwelling and the dwelling does not result in a completed DOE unit, the cost will be disallowed. The only exception to this is for extenuating circumstances beyond the Local Service Provider's control that prevent service delivery of weatherization following completion of WRF work (e.g., a client death, sale of home, client refusal of major measures after weatherization work has already begun). WRF funds must be tracked separately from other DOE funding.

### Repairs Eligible for WRF Funding

The following is a non-comprehensive list of repairs that are eligible for WRF funds. Items not on this list can be implemented based on the discretion of the Subgrantee after discussions with CSD.

- Asbestos remediation
- Ceiling repair
- Electrical upgrade or repair
- Exterior drainage repairs (e.g., landscaping or gutters, bulk moisture control)
- Floor repair
- Mold remediation

- Pest infestation
- Plumbing repair (including sewer/septic repair)
- Roof repair/replacement
- Structure repair
- Wall repair (interior and exterior)
- Other (as needed to correct dwelling deferrals must be pre-approved by CSD)

Units needing repairs beyond those supported by WRF, weatherization assistance, and other funding sources will be deferred under the regular deferral policy.

# WRF Tracking

For each client, Subgrantees are required to report WRF expenditures and repairs in CSD's online reporting system. The DOE WAP Unit will monitor the WRF ACPU throughout the program year to ensure compliance.

## Client Files

Each unit that receives WRF funding will require photographic documentation of the conditions requiring the WRF work and any additional supporting documentation to validate the use of WRF funds. A copy of the contractor's license for all work performed by a third-party contactor must be saved and included in the client file. These photos and all other supporting documentation must be included in the client file of the completed unit to substantiate the use of WRF funds.

Due to the nature of this funding, CSD will request a sampling of DOE WAP WRF jobs for monitoring purposes.

### V.1.3. Definition of Children

"Children" are defined as members of a household who have not attained their nineteenth (19th) birthday.

# V.1.4 Approach to Tribal Organizations

The State ensures that low-income members of the American Indian population receive services equivalent to the assistance provided other low-income persons within the state. CSD recommends that a Tribal organization not be treated as a local Subgrantee applicant due to the difficulty in establishing and sustaining a weatherization program. Based on CSD's allocation formula, the grant allocation to the Tribes would not provide enough resources to implement a full-service program from the ground up and would be too low to sustain an ongoing localized program.

CSD field monitors obtain updates on tribal interaction, outreach activities and service provision as part of the LIHEAP Local Plan that is reviewed during shared DOE and LIHEAP monitoring visits to Subgrantees. The Local Plan details the relationship and services that each Subgrantee has with Tribal members in their service area. Services may be delivered through individual interaction with Tribal members, and through more formal efforts such as working directly with the Tribal Housing Authority and Social Services office.

#### V.2 Selection of Areas to Be Served

A service area may be a portion of a county, an individual county, or a group of counties. The projected funding, goals, and other information for each service area are set forth in Subgrantee Information in the Annual File.

When a Subgrantee cannot serve their designated service area for DOE WAP, CSD will attempt to contract with a neighboring (in-network) Subgrantee until services can be resumed by the former Subgrantee. If the Subgrantee cannot resume services, it may be necessary to procure a new Subgrantee.

Funds may also be redistributed to an existing Subgrantee(s) with capacity to provide DOE WAP services for the following reasons:

- A Subgrantee (i.e., the original recipient) cannot meet their production goals.
- A Subgrantee is not in compliance with program requirements or other extenuating circumstances.
- A Subgrantee has determined that DOE funds are insufficient to administer and maintain the DOE WAP at the local level.
- A Subgrantee does not maintain the services of a certified Quality Control Inspector for the duration of the contract term.

Due to supplemental funding awarded with the Bipartisan Infrastructure Law Department of Energy Weatherization Assistance Program Grant (BIL WAP) and reliance on leveraging Low Income Home Energy Assistance Grant funds to facilitate the administration of DOE WAP at the local level, Subgrantees are having difficulty fully spending their annual DOE WAP allocation. With the recent decrease in Low Income Home Energy Assistance Program (LIHEAP) funding and a lower health and safety percentage maximum, many Subgrantees have expressed concerns about having enough LIHEAP leveraging dollars to match with both the Annual DOE WAP Grant and the BIL WAP Grant. However, through the BIL WAP, CSD is nearly able to achieve statewide coverage by providing services in almost all 58 counties.

It should be noted that all WAP Subgrantees currently receive funding under CSD's LIHEAP program, which provides an array of energy assistance services, including weatherization and emergency repairs to heating and cooling appliances. These services are provided throughout the state in every county and at levels significantly

higher than the Annual DOE WAP. If a resident specifically requests DOE WAP services in any county not currently served by an active DOE WAP Subgrantee, CSD will coordinate with that Subgrantee to ensure that the eligible household receives other available weatherization services.

## V.3 Prioritizing Clients

Weatherization services performed must align with the DOE WAP rules and regulations, CSD Technical Reference Manual (TRM), CSD's Eligibility and Verification Guide, and 10 CFR Section 440.16. CSD contracts require participating Subgrantees to develop service priority plans, which require the following:

- No dwelling unit may be weatherized without documentation that the dwelling unit is an eligible unit for DOE WAP services.
- Priority is given to identifying units/dwellings owned or occupied by low-income persons that are particularly vulnerable, including elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens. Subgrantees indicate how units/dwellings meet these criteria in a detailed narrative on Form CSD 793 – DOE Weatherization Priority Plan Narrative (Attachment T).
- Subgrantees are required to have written policies outlining how DOE weatherization services are provided meeting the criteria of 10 CFR Section 440.16.

Waiting lists may be maintained by Subgrantees when demand for services exceeds capacity. Each Subgrantee determines how they draw applications from their waiting lists in accordance with service priority requirements. Applications that do not meet CSD's eligibility timelines must be recertified before services can be provided.

A high residential energy user is defined by contract as a low-income household whose residential energy expenditures exceed the median level of residential expenditures for all low-income households in the state. Subgrantees upload client income and utility data to CSD's online data collection system from which an energy burden is derived. On CSD's DOE Weatherization Priority Plan Narrative (CSD Form 793), Subgrantees provide their plans for prioritizing services to elderly persons, persons with disabilities, families with children, high residential energy users, and households with a high energy burden.

#### **V.4 Climatic Conditions**

California experiences a wide range of climatic conditions ranging from a Mediterranean-like climate with warm, dry summers and mild, wet winters to temperature extremes in the Central Valley, Mountain, and Desert areas. CSD currently uses the U.S. Climate Zone Map provided by the California Energy Commission (CEC) which consists of 16 climate zones. To be more consistent with the applicability of

California Title 24 requirements and to remove the subjectivity related to using weather stations, the CEC climate zones replaced the DOE climate zone map. Priority lists were developed using Region 1 (Hot) from the climate zone map as identified in WPN 22-8 for DOE-WAP Sponsored Priority List for Site-Built Single Family, Manufactured Homes, and Low-Rise Multifamily dwellings.

The Subgrantees use the data included in the Energy Audit/Priority List Protocol to customize the energy audit for dwellings to be weatherized. Much of California requires heating and cooling to achieve comfort standards. Refer to Attachment R: California Energy Commission Climate Zones by County and City and Attachment S: California Building Climate Zones Map.

With such diverse housing stock spanning the whole of California's 16 climate zones, CSD currently does not track energy savings differences between Subgrantees. CSD does, however, take note of Subgrantees that demonstrate improved effectiveness in the installation of weatherization measures and measure cost efficiencies. These components effectively allow CSD to continue to hone training and technical assistance (T&TA) activities and priorities.

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

#### V.5.1 Technical Guides and Materials

All weatherization work is performed in accordance with DOE-approved energy audit procedures and 10 CFR Section 440, Appendix A. CSD has developed manuals in compliance with WPN 22-4 to guide Subgrantees in the proper delivery of weatherization services. The primary field guidance is the Technical Reference Manual (TRM), which serves as the benchmark for quality workmanship and as a tool for measuring quality performance. The TRM incorporates the Standard Work Specifications (SWS) for Home Energy Upgrades pertaining to material and installation specifications, provides guidance on key work procedures, and outlines the field policies for the Subgrantees. The TRM is available electronically for Subgrantees and their subcontractors on CSD's Local Agencies Portal. CSD regularly updates the TRM to reflect recent DOE guidance and code changes, and once approved by DOE, the manual is released to the Subgrantee network.

CSD issues energy-focused Program Notices (CPN-E) to introduce new policies related to subjects such as asbestos removal, callbacks, and audit protocols. Energy-focused CSD Program Advisories (CPA-E) are issued to provide clarity on the TRM and other policies, as needed. In addition, CSD maintains a technical assistance hotline staffed by CSD technical unit employees.

CSD contracts require Subgrantees to adhere to the latest version of the TRM, Energy Program Notices, Office of Management and Budget (OMB), and other federal and state

laws, regulations, and guidelines. When subcontracting, Subgrantees are required to include all program requirements in their subcontractor contracts.

A signature on the contract is confirmation by the Subgrantees and their subcontractors that they understand the work expectations and standards required when utilizing WAP funds. Full detail of these requirements can be obtained by referring to Attachment I: WPN 22-4 Quality Work Plan.

All technical guides and materials are located on CSD's secure Local Agencies Portal (LAP) website. The LAP is only accessible to Subgrantees and CSD staff and requires a login.

The National Environmental Policy Act (NEPA) is a federal law requiring all federally funded projects to consider environmental impacts of work to be performed. Requirements for data tracking are defined based upon a DOE WAP determination by the state. As it relates to eligible structures, CSD and its Subgrantees will comply with all NEPA requirements as documented by the NEPA Determination and WAP Guidance documents.

#### V.5.2 Energy Audit Procedures

The CSD TRM was submitted and last approved by DOE in June 2024 and was released to Subgrantees on November 1, 2024, with an effective date of January 1, 2025. The TRM provides details about the DOE-approved energy audit and priority list methodologies and measure installation hierarchy. CSD's Energy Audit and Priority List Protocol for Site-Built Housing (1-4 Units), Manufactured Housing, and Small Multifamily (five to 24 Units) was last approved by DOE on April 20, 2020. The protocols will remain in effect until April 20, 2026. CSD will submit updated protocols to DOE for approval six months prior to expiration.

Each dwelling served under DOE WAP must follow either the Priority List (PL) path or Audit path based on an established set of criteria. When the Priority List path will be applied as determined by the CSD 710 Energy Audit/Priority List Checklist, a prescriptive list of measures must be installed based on building type and the approved dwelling criteria.

CSD utilizes REM/Design auditing software for single-family dwellings, mobile homes, and multifamily buildings with 24 or fewer dwelling units, where each unit is independently heated and cooled. The Targeted Retrofit Energy Analysis Tool (TREAT) will be used for all large multifamily buildings (25+Units) and small multifamily buildings (five to 24 Units) with common heating and/or cooling systems, or common water heating. REM/Design will be used for small multifamily buildings of 24 or fewer units with independent heating/cooling systems. All TREAT projects will be submitted to DOE for approval prior to commencement of work.

For detailed procedures on energy audit requirements and the priority list, consult Attachment Q: Technical Reference Manual, Appendix D, Energy Audit/Priority List Protocol.

## V.5.3 Final Inspection

Subgrantees are required to review and inspect all dwellings weatherized. A statement on the CSD Post-Weatherization Inspection Report certifies that all required measures were installed in accordance with contract and program requirements and shall be signed and dated by the Certified Quality Control Inspector (QCI) including the QCI's Certification Number.

Subgrantees are required to have 100 percent of their completed units inspected by a QCI who has not performed any of the weatherization work on the inspected unit and has met CSD training and DOE certification requirements. CSD will conduct a minimum of five to 10 percent of third-party quality assurance inspections on completed dwelling units for all Subgrantees.

It may not be feasible to have a separation of duties between a weatherization installer and inspector. Exemptions are granted on a case-by-case basis, such as when the Subgrantee is a small rural agency with a very small number of staff, or has temporary staffing shortages due to medical leave, turnover of critical staff, or difficulties in finding qualified personnel. When these exemptions occur, inspections will be increased to at least 10 percent. Additionally, when the Subgrantee has opted to use the QCI mentorship option or has experienced a break from services in the formula grant, a higher percentage of inspections will also be applied.

If there is no QCI on staff, the Subgrantee is required to contract with a neighboring Subgrantee or another qualified technical consultant to perform the required inspections. All diagnostic tests are required to be re-performed to ensure that the tests are being properly conducted.

CSD third-party inspections of assessments, energy audits, diagnostics, post inspections, and installed weatherization measures are performed by a contracted third party and CSD QCIs. These inspections are comprised of a sampling of weatherized homes. All diagnostic tests will be re-performed to confirm test results. Statewide standards for the installation of weatherization measures and inspections of homes weatherized by Subgrantees will help assure that weatherization measures are being installed properly.

If it is determined during CSD's QCI inspections that work performed by the Subgrantee including QCI inspections is not in accordance with program policy and work quality requirements, then corrective action and special conditions may be applied to address identified work deficiencies. Special conditions may include requiring training and/or technical assistance; the imposition of special or additional reporting requirements; special or conditional cost reimbursement requirements and procedures; the provision

of documentation by Subgrantee; and/or the requirement to amend or modify systems, procedures, and/or policies.

### V.6 Weatherization Analysis of Effectiveness

## How is the effectiveness of Subgrantee weatherization assessed?

In evaluating the effectiveness of Subgrantees, the following criteria is reviewed:

- The number and type of program compliance findings.
- The number and types of measures applied to completed units.
- The number and types of inspection findings.
- Final contract expenditure completed units and adherence to Average Cost Per Unit (ACPU).
- Regular monitoring to ensure compliance with other contractual programmatic requirements.
- Subgrantee staff turnover.

CSD's Field Representatives perform programmatic evaluations. As part of the programmatic evaluation process and monitoring scope, Subgrantees are required to submit various internal policies and procedures, including but not limited to effective internal controls, subcontractor oversight (when applicable), and others pertaining to areas of contractual compliance. The department currently collects individual dwelling data electronically from each Subgrantee in a central database repository maintained at CSD. Information contained in the database repository is used to evaluate the following:

- Cost allowances.
- Reasonableness of costs.
- Tracking of weatherized homes.
- Program compliance.

The development of automatic comprehensive analysis, data reporting, and enhanced reporting continues. All changes to CSD's monitoring and inspection protocols, field and programmatic policies, and weatherization contracts are discussed and reviewed with a representative group of Subgrantees before enactment. Depending on the nature of the change(s), training may be required to help ensure these changes are effectively communicated and implemented.

# How are training needs being assessed and how are the comparisons used in the development of T&TA activities and priorities?

Training needs are assessed through programmatic monitoring and field inspection visits. Thus, when training needs are identified, one or more of the following actions are taken:

- The issue is discussed with Subgrantees as part of their exit interviews and/or communicated via formal monitoring and inspection reports.
- As needed, a training referral may be issued and training (field-related or programmatic training, or mentoring) will be coordinated accordingly.

More extensive training-related issues can result in multiple visits by CSD's field and qualify assurance (QA) staff to assess improvement, the need for additional training, or conduct comprehensive investigations.

Comparisons between Subgrantees are used in the development of T&TA activities and priorities in the following ways:

- To foster discussion with field staff and, if necessary, executive management concerning programmatic or operational barriers.
- To discuss solution options including, but not limited to mentoring and training.
- To assist in identifying of best practices supporting strong and effective program administration and service delivery.

Additionally, deficiencies identified through on-site programmatic and inspection visits may result in training referrals. If issues are widespread, webinars and online trainings are developed and delivered on a statewide basis.

CSD's new Training Portal (a Learning Management System) was implemented in January 2023. It greatly assists with training needs assessments, Subgrantee training and certification tracking, training registration, access to online training and videos, and a variety of other training related applications.

# How is the Grantee incorporating monitoring feedback?

Monitoring feedback is incorporated in the following ways (as applicable):

- Programmatic changes.
- Development and future updates of the department's new field standards (TRM).
- Supplemental trainings, as needed.
- Development of resource material that is available electronically on the Local Agencies Portal website.

# What is the Grantee doing to be on a path of continuous improvement?

Every year the field monitoring and quality assurance inspection tools are reviewed and updated as required to improve their effectiveness and to incorporate changes addressing new issues identified throughout the previous year. These tools include:

- Improved data transfer rules have been developed and implemented at the local level to ensure improved data collection.
- Diagnostic forms are provided in two formats: hardcopy and automated (Excel with formulated fields). As another option, the Subgrantees' software vendors (i.e., Front-End Vendors) have developed electronic versions of CSD's assessment form compatible with their local systems. Subgrantees are encouraged to implement automated or electronic applications for field use. These forms will help standardize data collection and provide added value in the field.
- CSD conducted an electronic forms (eForms) pilot with several Subgrantees. The
  eForms pilot sought to ascertain how to overcome obstacles in replacing paper
  forms with virtual forms. The pilot concluded in 2022. Many field forms are
  available electronically using the FastField platform. Front-end vendors were also
  provided schemas for approximately one-third of the developed forms for
  integration into their platforms.
- Online training was developed in lieu of the planned regional trainings for the new TRM. Virtual Q&A sessions were held, and a FAQ document was created because of these sessions and posted to CSD's Local Agencies Portal.
- On January 24, 2024, CSD issued an announcement regarding the formation of the Weatherization Training and Technical Committee (WTTC) to provide input on approaches to help LSPs overcome challenges in meeting on-the-job training requirements as outlined in the CSD Training Policies and Procedures manual and to provide further refinements to the weatherization training curriculum. The first meeting for the WTTC took place on February 29, 2024. After completing the initial work focus for on-the-job training, the WTTC will be tasked to direct its attention to other areas of the weatherization program, including the Learning Management System (LMS), training curriculum enhancements, and technical weatherization policies.

## How is the Grantee tracking Subgrantee performance reviews?

Findings by CSD's Field Representatives and QA team are tracked in spreadsheets to ensure that action plans are completed and inspection findings are rectified and closed. Significant findings can lead to added compliance monitoring, special contract conditions, or a high-risk designation where more stringent special conditions can be applied and where additional on-site visits and/or desk reviews will occur.

#### If a Subgrantee has failed final inspections, how are things improving?

CSD QA Inspections performed on completed DOE WAP units for other Agencies did not reveal significant findings or workmanship issues. CSD will continue to track findings associated with assessments, measure installation, and overall workmanship while noting final inspections to confirm satisfactory workmanship by Subgrantees. In addition, CSD will continue to track the implementation and execution of any Training

Referrals and/or Corrective Action Plans issued, and evaluate whether improvements are being made as required, or if additional action will be required.

# If a Subgrantee has management findings or concerns cited as a result of Grantee monitoring or audit proceedings, how are things improving?

In the past, CSD has placed Subgrantees on high-risk status and, when necessary, removed the Subgrantee temporarily or permanently from the program. CSD monitoring tools have continuously improved, and as a result, CSD is better able to identify and address issues sooner. Significant improvements can be made to enable a return to normal status in some cases. These improvements are due in part to several site visits, consultations, and field training.

# What are the management mechanisms being put in place this year to affect improvement?

As part of CSD's reimbursement process, Subgrantees continue to upload data into a centralized weatherization database system monthly. The weatherization project file uploads are subjected to additional validations which improve the overall quality of electronically reported project records from Subgrantees to CSD. CSD continues to design specific reports to identify compliance issues and provide statistical feedback for administrative purposes. In 2023 CSD launched its new CSD Training Portal, which assists in identifying training non-compliance.

CSD works closely with Subgrantees to help them develop a better understanding of the Average Cost Per Unit (ACPU) grant requirements. Efforts in this area include:

- Increased training and communication with Subgrantees to help them better understand average investment per unit contract requirements and grant ACPU.
- Requiring Subgrantees to monitor their contract expenditure investments in completed units monthly.
- Providing regular updates to Subgrantees to confirm their current ACPU throughout the program year.
- Increased monitoring of Subgrantees to ensure adherence to contract average cost per unit.

#### Are there technical and financial systems that have been reviewed?

CSD provides data transfer rules to the two front-end vendors who offer reporting software to Subgrantees. From a review perspective, the systems must incorporate these data transfer rules to validate uploaded data. CSD continues to expand and enhance data transfer rules to validate additional programmatic requirements.

# What has the Grantee done around market analysis to ensure particular measures are being costed accurately?

During field monitoring, Subgrantees are asked to provide backup documentation to support specific line items from their summary expenditure reports. Bid documents and subcontracts are also reviewed particularly when costs do not appear to be reasonable.

Subgrantee procurement standards must be in accordance with all federal and state rules and regulations governing DOE WAP grants pertaining to procurement, including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements. Subgrantees must establish, maintain and follow written procurement procedures consistent with the procurement standards in 2 CFR Section 200.317 through Section 200.326. Measure costs are also evaluated by CSD's third-party QCI during inspection visits. Weatherization measures not included in the energy audit are subject to cost maximums established by the Weatherization Measure Matrix.

When necessary, an Auditor will make an on-site visit to investigate any costs that are deemed inappropriate or inaccurate. Any discrepancies that cannot be explained become a finding and a possible disallowance.

This evaluation of cost data is ongoing and will be revisited annually to ascertain the need for any necessary adjustments.

## V.7 Health and Safety

Subgrantees will be authorized to mitigate health and safety hazards within the scope of the weatherization program pursuant to the CSD Health & Safety Plan, CSD Policies and Procedures, and CSD's TRM.

Details related to health and safety protocols are found in Attachment H: CSD Health and Safety Plan.

## V.8 Program Management

#### V.8.1 Overview and Organization

The mission of the Department of Community Services and Development (CSD) is to improve the economic security of vulnerable Californians through programs and partnerships that support the state's diverse communities.

As a department under the umbrella of the California Health and Human Services Agency, CSD works with community-based partners dedicated to helping vulnerable Californians achieve and maintain economic security, pay their energy bills, and meet their home energy needs through energy efficient weatherization and renewable energy.

CSD administers the following federal programs intended to reduce poverty and improve the lives of low-income Californians:

- U.S. Department of Energy Weatherization Assistance Program (DOE)
- U.S. Department of Health & Human Services Low Income Household Water Assistance Program (LIHWAP)
- U.S. Department of Health & Human Services Low Income Home Energy Assistance Program (LIHEAP)
- U.S. Department of Health & Human Services Community Services Block Grant (CSBG)
- CSD also administers several state-funded programs that reduce poverty and improve the lives of low-income Californians such as California Low-Income Weatherization Program (LIWP) and California Earned Income Tax Credit Education and Outreach Program.

All weatherization programs administered by CSD are managed by a team that consists of Program Analysts, Field Representatives, internal QCI staff, Fiscal and Contracts Units, and through the assistance of services provided by third-party consultants for dwelling inspections and training and technical assistance. For a description of CSD staff duties and organizational structure, refer to Personnel Object Class in Budgets and Attachment L, Organizational Chart.

CSD subcontracts with a network of Subgrantees that provide DOE and LIHEAP weatherization services. The network is comprised of Community Services Block Grant agencies and public or non-profit entities that have over 45 years of experience in providing public assistance programs to the low-income households in their respective service territories.

For the DOE WAP grant cycle, Subgrantees interested in administering the annual DOE WAP grant program must complete a brief application outlining the Subgrantee's specific allocation request and plans for ensuring the successful expenditure of the allocation within the 12-month contract term. Upon receipt of all applications, CSD will allocate available funding after a review of past performance, the allocation amount requested, and projected Subgrantee capacity to comply with grant objectives and requirements. The application process promotes understanding of policy updates associated with the upcoming grant policies that are in transition. This process enables Subgrantees to make an informed decision on whether to apply for new grant funds and encourages greater engagement in the development and review of the annual DOE WAP State Plan.

CSD will continue to administer the DOE WAP through its Subgrantee network for the annual DOE WAP. When CSD determines that an organization is not administering the program satisfactorily, it may take the following action:

- Correct the problem(s) with training, technical assistance, and/or imposition of special contract conditions; or
- Reduce a Subgrantee's future allocation(s), including capped budget items, if the Subgrantee does not fully expend its allocation by the end of the contract term; or
- Re-assign the service area to another existing Subgrantee; or
- Solicit or select a new or additional Subgrantee in accordance with 10 CFR Section 440.15 provisions.

#### V.8.2 Administrative Expenditure Limits

CSD will retain one-half (7.5 percent) of the allowable 15 percent of administrative funds; Subgrantees will receive the remaining funds (7.5 percent), per DOE guidelines. Subgrantees allocated \$350,000 or less will not be provided the opportunity to apply to CSD for approval to use up to an additional five percent of their funding for administration.

## V.8.3 Monitoring Activities

#### **Monitoring Approach**

CSD conducts onsite inspections, desk reviews, and quarterly reviews to ensure Subgrantees meet the performance goals, administrative standards, financial management requirements, and other requirements of the DOE WAP and CSD contracts and weatherization standards. In addition to the onsite visits by QA personnel (detailed below under the QA section), Field Representatives will conduct annual program and fiscal monitoring to determine the program and operational effectiveness of Subgrantees through desk reviews and onsite visits. Subgrantees determined to be at a higher risk will receive onsite program monitoring in addition to the onsite monitoring by QA. An annual comprehensive desk review will be conducted on each Subgrantee, and the scope will be the equivalent of an onsite visit. To facilitate this process, Subgrantees will be instructed to submit necessary documents and client files for review purposes electronically. Findings based upon unauthorized measure installation, billing discrepancies, client and dwelling ineligibility may result in disallowed costs. CSD has 15 full-time staff within three Energy Division units who perform monitoring functions in various capacities: DOE WAP, Field Operations, and Energy Technical Support. There are also three staff with third-party independence who perform unit inspections. All staff who perform unit inspections are QCI-certified as required by DOE WAP. 29 percent of the Grantee T&TA allocation (or 20 percent of the total T&TA allocation) is dedicated to field monitoring and inspection purposes including travel. These activities are leveraged with LIHEAP.

CSD's monitoring program consists of the following strategies:

## Programmatic and Management Monitoring:

#### Subgrantee Review:

- Monitoring tools are reviewed and updated annually. The tools address but are not limited to administrative review, conflict of interest, inventory management, record retention, complaint management, and procurement; fiscal review (billing process, line-item reconciliation, expenditure status and benchmarks); and programmatic review (prior monitoring issues, eligibility, client file review, diagnostic testing, re-weatherization, State Historic Preservation Office (SHPO).
- Field representatives conduct annual comprehensive desk reviews equivalent to an onsite visit. These reviews include but are not limited to, an evaluation of the Subgrantee's expenditure performance, financial evaluation, adherence to budget restrictions, client file reviews, and operational deficiencies.
- For Subgrantees that received recent DOE WAP funding and exhibited no performance issues, client file reviews will be limited to five percent of client files or five client files (whichever is greater) associated with assisted households over the course of the new DOE WAP contract term.
- For Subgrantees that have not received recent DOE WAP funding, client file reviews will be limited to a minimum of 10 percent of client files or 10 client files (whichever is greater) associated with assisted households over the course of the new DOE WAP contract term.
- Noted concerns are brought to the attention of the Subgrantee's Executive Director and/or Board Chair for resolution and may result in an onsite visit or increased reporting requirements, such as additional comprehensive evaluations. Subgrantees determined to be at a higher risk will receive onsite visits.
- All contracts, program notices, policies, audit protocols and installation standards are available electronically through CSD's Local Agencies Portal. Installation standards can be downloaded for easy access in the field.
- There is a separate web-based system that tracks and facilitates approval of work to be performed on dwellings that meet the SHPO criteria.

#### Financial/Administrative:

- Accounting systems and weatherization reporting software are noted in the Subgrantee working files. A consolidated list is maintained of the software used for reporting weatherization activities and expenditures.
- Program notices have been issued for procurement, capped budgetary line items, program income and contract implementation options (in-house crews vs. subcontractors) as guidelines for Subgrantees to meet OMB and contract requirements.
- Monthly and quarterly reviews are conducted to track expending of capped line items and other program requirements including inspections. CSD reviews for disproportionate spending to other activities, or whether the proper number of inspections has not been completed annually during close-out procedures as part of a final inspection process. Subgrantees are required to submit proof of liability insurance before contract execution.

## **Eligibility**:

- CSD issues an annual Eligibility and Verification Guide that outlines eligibility criteria, income verification, energy cost verification and appeal processes. An intake form (automated and/or hard copy) is completed by Subgrantees that includes all the necessary requirements to qualify clients.
- Client data maintained in CSD's repository includes client demographics, household income, and energy costs for federal reporting and monitoring purposes.
- Costs are disallowed for any work performed for ineligible clients.

#### Rental:

- By contract, rental service agreements signed by occupants and property owners include language protecting occupants from rent increases because of the weatherization services provided.
- For large multi-unit projects, CSD staff evaluates whether any undue enhancement might occur in the value of the dwelling units and confirms that the benefits of weatherization accrue primarily to the residents.
- CSD QC Inspectors give special attention to inappropriate or unnecessary enhancements for any rental files and/or dwellings inspected. If there are reports of improprieties, the inspectors conduct a follow-up investigation and address remedial action with the Subgrantee as deemed appropriate.

## **Energy Audits:**

- CSD has established audit protocols for single family, mobile home, and multifamily dwellings.
- For new Energy Auditors (Tier 1), all electronic audit files and supporting pictures are required to be submitted to CSD for review and approval before work commences. Experienced Energy Auditors (Tier 2) are required to submit all audits for CSD review; however, work can commence before the Auditor receives an approval. Audits are rejected when anomalies are found and Subgrantees are asked to correct and resubmit. Any serious misuse of audits can lead to disallowances and high-risk designation.
- Although photos are not required from Tier 2 Auditors, CSD reserves the right to request photos at any time.
- For large multi-family building projects where the TREAT audit software is used, CSD and CSD's technical consultant review the projects before forwarding to DOE for approval.
- As part of the annual application process, Subgrantees notify CSD of any local training needs. Existing Energy Auditors are required to take bridge and/or refresher REM Design training(s) when updates are made to the Energy Audit Protocol.

#### Field Work:

- CSD contracts contain an extensive list of required documentation to be maintained in each client file.
- CSD contracts require that completed units can only be billed after they have been inspected. CSD staff review monthly activity reports to confirm that inspections have been performed. Per CSD's data transfer rules, Subgrantees must report if any measure is to be billed to DOE. Entering Subprogram Code "DOE" code triggers a business rule that ensures inspections are billed.
- Inspections are required to be performed by a Certified Quality Control Inspector and are confirmed through client file review. Quality Control Inspector certificates are required to be on file at CSD.
- All Subgrantees are required to use a standardized inspection form that includes the inspector's name and signature, Building Performance Institute QCI certification number, inspection date and time, and client's signature.

- Subgrantees are required to correct any deficient work identified by their internal
  inspectors before the work is submitted for reimbursement. Because of CSD
  inspections, Subgrantees with incomplete work and workmanship issues are
  asked to rectify the problem before disallowances are levied. Subgrantees will be
  asked to reverse or repay costs that are determined to be unallowable. If
  questioned costs are significant, an investigation may be performed, and
  inspection percentages may increase.
- When necessary, communication between the Subgrantee and client may be overseen or initiated by CSD staff to help resolve the complaint. If not resolved, the client is made aware of the appeal and fair hearing processes.
- Policy changes are derived from input from the Subgrantee network, CSD staff, CSD's technical consultant and Federal partners.

#### Health & Safety:

- CSD's Health and Safety Plan is incorporated into the contract by reference and training is readily available to Subgrantees through CSD's Training Portal.
- Subgrantees are required to maintain and have available for review all training records and certifications. In addition copies of training certificates are maintained in the CSD Training Portal.
- Field monitoring guidelines include the quarterly verification of the Injury and Illness Prevention Plans, Respirator Programs and Safety Data Sheets binders.

#### Equipment/Inventory/Materials:

- Subgrantees are required to have inventory policy and procedures that include processes to ensure adequate safeguards to prevent loss, damage and theft, and proper accounting. Records are to be maintained of all equipment purchased with Federal grant funds, their utilization and continued need for the equipment.
- Subgrantees are required to have a written procurement policy in place that follows OMB requirements, demonstrates a competitive bid process is conducted when applicable, and that purchases over \$5,000 receive CSD and DOE approval prior to purchase.
- Subgrantees are required to have a written conflict of interest policy in place to
  prevent and deter any occurrence of organizational conflicts of interest or
  noncompetitive practices that may restrict or eliminate fair competitive advantage
  or otherwise restrain trade.

 Subgrantees are required to follow the vehicle and equipment disposition policies set forth in WPN 17-6: Property Acquired Under the Weatherization Assistance Program Including Vehicle and Equipment Purchases.

## **Quality Assurance:**

- During annual monitoring, Field Representatives conduct client file reviews for inclusion of all required documentation including eligibility, completeness of forms, and adherence to other contract requirements.
- At a minimum twice per year, and annually for small Subgrantees, quality
  assurance of Subgrantees' field work is conducted by third-party inspectors, all of
  whom are QCI certified. Consolidated pass/fail inspection rates are maintained
  by CSD. Programmatic findings and resolutions are maintained for tracking
  purposes as well as the identification of trends. CSD regularly monitors thirdparty inspectors. CSD QAIs review all third-party QCI inspection reports each
  month for compliance and to monitor third-party QCI inspection performance,
  including review and approval of invoices from third-party QCI.
- CSD has developed a Quality Work Plan in accordance with WPN 22-4 Quality Work Plan Requirement. Refer to Attachment I: WPN 22-4 Quality Work Plan Requirements.

#### Training & Technical Assistance:

- Through monitoring and inspection processes, the need for training may be identified. When the need arises, a referral is made by the technical support unit to arrange for training though the CSD-approved training centers, CSD's technical consultant, or CSD internal technical staff. Additionally, Subgrantees can initiate training themselves by submitting a request to the technical support unit or through the CSD Training Portal.
- CSD's contract has specific training requirements that must be met within certain time frames for Subgrantee staff to continue working within the program. Training records for the required online, classroom and field training are maintained by the Subgrantee and CSD. CSD's Training Portal serves as the primary platform for training records.

#### Feedback and Reporting:

- CSD holds quarterly meetings with the Subgrantee network. A subcommittee
  comprised of a representative group of Subgrantees generally meets once a
  month to discuss policy development for all CSD-administered energy programs.
- Subgrantees are required to submit monthly activities and expenditure reports.
   CSD reviews the reports and contacts Subgrantees about any anomalies found.

 All findings through monitoring and technical investigations culminate in reports provided to the Subgrantees and their respective board of directors. Inspection reports are provided to Subgrantees during exit interviews.

#### Required Follow-Up Procedures:

 Both Field Representatives and Quality Assurance Inspection teams issue reports following their visits and reviews. Field Representatives submit reports within 30 days of their monitoring. Third-party inspectors issue inspection reports at the completion of inspection visits. All findings are tracked and followed through resolution. Depending upon the severity of the finding, a return visit or review to verify resolution may be necessary and/or the frequency of inspections may increase.

# **Subgrantee Monitoring**

#### Program Overview (Client File Review, Work Orders, etc.):

- Field Representatives confirm that Subgrantees have the necessary information and forms to administer the weatherization program effectively and meet program requirements.
- Through client file reviews, Field Representatives confirm all documentation is
  present as required by contract, including but not limited to eligibility, SHPO
  reviews, priority list and energy audits, prioritization of services, completed work
  is documented and justified, and re-weatherized dwellings handled appropriately.
- CSD Inspectors review the more technical aspects of the client file including combustion appliance safety testing, blower door, and duct leakage diagnostics. Assessments, energy audits, work orders, work justification, permits, Home Energy Rating System ratings, file notes, and Subgrantee inspections are also reviewed.

#### Financial/Administration:

• The fiscal and performance review conducted by Field Representatives ensures that the Subgrantee is on track with their expenditures, performance, and benchmarks. This review includes validating claims submitted for reimbursement, line-item reconciliation, verification of the Subgrantee's billing process, verification of internal controls, and verification of procurement procedures.

#### Inventory:

- Field Representatives ensure that Subgrantees have written inventory policy and procedures in place, review Subgrantees' tracking procedures, and review vehicle tracking logs.
- A third-party inspector reviews equipment and calibration tracking logs.

#### **Energy Audits:**

- CSD's Technical Support Unit and CSD's third-party technical consultant are responsible for evaluating the integrity of the energy audits for all dwelling types.
- Field Representatives and CSD Quality Assurance Inspectors review files for inclusion of the Priority List Checklist and energy audit reports. CSD Quality Assurance Inspectors verify the proper application of the priority list and energy audit.

# **Qualifications & Training:**

- Field Representatives and Technical Support staff follow up with Subgrantees
  when required training is incomplete, training discrepancies are found, or
  Subgrantee staff is found to be working in areas for which they are not qualified.
- The Technical Support Unit will verify any training referred by Field Representatives and CSD Quality Assurance Inspectors was completed.

#### Weatherization of Units:

When CSD Quality Assurance Inspectors find work that needs to be addressed, an evaluation will take place to determine and document why it was not identified through the Subgrantee's own inspection process and if any trends are present. Subgrantee Inspectors, crews, and field supervisors may be referred for additional training or have disallowances levied.

### Health & Safety:

- The implementation and continual application of health and safety guidelines are monitored through the quality assurance inspection and field monitoring processes, which includes client file reviews and client and Subgrantee staff interviews. Deficiencies are reported and must be addressed.
- Field Representatives and CSD Quality Assurance Inspectors review client files for the resolution of identified health and safety issues, required client education,

- and renovation, repair, and painting documentation. A finding is issued and Subgrantees are required to resolve any issues left unresolved.
- CSD inspections currently include questions related to the application of leadsafe practices, the applied use of Lead-Safe Work standards during weatherization services, and renovator records.

#### Final Inspections:

- CSD third-party inspectors and/or CSD Quality Assurance Inspectors will conduct inspections to monitor feasibility of weatherization measures, quality of workmanship, material standards, review of client files, proper application of the DOE Priority List, energy audit protocols, and installation standards. Third-party Inspections are conducted at a rate of a minimum of five percent up to 10 percent of all completed units for each Subgrantee, CSD Inspectors use a standardized form to record measures installed and billed, feasibility, and workmanship. This process ensures dwelling units reported to DOE have had all weatherization measures installed and a QCI has been completed.
- For Subgrantees that received previous DOE WAP funding and exhibited no
  performance issues, third-party quality assurance inspections will be limited to a
  minimum of five percent of completed projects associated with assisted
  households over the course of the contract term.
- Subgrantees who meet the following criteria will be subject to third-party inspections of a minimum of 10 percent of completed projects associated with assisted households over the course of the current DOE WAP contract term.
  - Subgrantee has been granted a separation of duties waiver on a case-bycase basis. Typically, these Subgrantees are small rural agencies with a very small number of staff or have temporary staffing shortages due to medical leave, turnover of critical staff, or difficulties in finding qualified personnel.
  - Subgrantee has opted to use the QCI mentorship option.
  - Subgrantee has not administered an Annual DOE WAP contract since at least the 2020 Program Year.
- Any identified inspection findings and trends are discussed with the Subgrantee, and training may be recommended.

#### Required Follow-Up Procedures:

 Both Field Representatives and the Quality Assurance Inspection team issue reports following their visits. All findings are tracked and followed through resolution.

#### Corrective Action Plan:

- Once CSD Monitoring Reports are finalized, Subgrantees have 30 calendar days to provide CSD with a Corrective Action Plan (CAP) for all Findings identified in the report. The following items must be included within their CAP:
  - Detailed action(s) that will be taken to resolve the finding(s);
  - A description of the internal control mechanism that will prevent and detect the issue(s) of noncompliance from future occurrence; and
  - The implementation date of the CAP, which is to be no later than 90 calendar days from the date of the finalized report.
- The CAP is reviewed to ensure Subgrantees have addressed all findings, and once confirmed, the monitoring report is closed. Follow-up is then conducted during the next monitoring cycle to determine if the Subgrantees are indeed following their CAP and if the issue can be considered fully resolved.

# **Financial Monitoring**

## Financial Management/Accounting Systems and Operations:

- Field Representatives review accounting operations by tracing a sampling of expenditures from source documentation through payment including bank statements.
- Enhanced monitoring and investigative audit visits will be conducted, as needed, to evaluate Subgrantees' accounting systems and fiscal integrity.
- Special investigations may be conducted by the CSD Technical Support Unit if deemed necessary.
- Field Representatives determine if internal controls are present with written policies in place. Audit staff will also review separation of duties and internal controls as part of their fiscal audit.

#### Audits:

- Auditors perform annual reviews of Subgrantees' OMB "Super Circular" audits for compliance with OMB requirements, follow up on findings identified in the Single Audit, and issue transmittal letters to Subgrantees that include findings.
- Investigative audits will be conducted, as needed, to evaluate Subgrantees' accounting systems and fiscal integrity.

#### Payroll/Personnel:

- Annual monitoring by Field Representatives may include reviews of payroll records, timesheets, and organizational charts. During onsite visits, Subgrantee staff is interviewed to determine job responsibilities, work performed under CSD programs, and any reporting irregularities.
- Testing of payroll records may be reviewed by Auditors dependent upon their audit work scope.

#### Vehicles and Equipment:

- Field Representatives determine if vehicles and equipment are properly tracked and maintained, are currently being utilized, costs are shared between programs (if applicable), and disposition.
- Testing of vehicle records may be reviewed by Auditors dependent upon their audit work scope.

#### Procurement:

- Field Representatives review Subgrantees' written procurement policies and procedures to verify that the policies have been followed, a competitive bid process is in place, items are cost allocated appropriately between different programs (if applicable), and that OMB requirements are being met.
- Testing of procurement processes may be reviewed by Auditors dependent upon their audit work scope.

#### Invoicing:

- Field Representatives verify the Subgrantee's billing process from intake through inspection for accuracy, review submittal of budget line items (on-site and desk reviews), test reasonableness and conformity of billed measures and trace costs to the general ledger.
- The Technical Support Unit may conduct special investigations in this area when deemed necessary.
- Testing of invoices may be reviewed by Auditors dependent upon their audit work scope.

#### **Records Retention:**

Subgrantees are required to retain records for a minimum of three years after the
close of the audit review and resolution of any findings or disallowances. Data
related to the weatherization of dwellings is uploaded and maintained in CSD's
central repository. CSD Field Representatives confirm Subgrantees' retention
policies are following these requirements.

#### Required Follow-Up Procedures:

- Both Field Representatives and the Quality Assurance Inspection team issue reports following their visits and/or in-house reviews. All findings are tracked and followed through resolution. Depending upon the severity of the finding, a return visit or follow-up review to verify resolution may be necessary.
- CSD's Audit Unit issues an Audit Transmittal Report after a desk review of single audit reports submitted by Subgrantees. Reports are issued because of any standard or investigative audit. Disallowances identified through these processes that are not repaid to the department could delay execution of subsequent contracts.

#### Expanded Monitoring Scope – Automation:

- CSD requires all Subgrantees to convert to fully automated data systems at the local level. Subgrantees have the discretion to choose the electronic solution that best fits their needs and meets the state's reporting requirements.
- CSD currently requires Subgrantees to transfer electronic client file data to CSD in a central depository monthly. It is limited to client information, demographics, and measure installation and related costs. The data can be accessed and evaluated for programmatic inconsistencies. For the current program year, Subgrantees will continue to enter summary level data for reimbursement purposes into CSD's web-based reporting system based upon reports generated from their databases.

# **Monitoring Reports**

Monitoring reports are provided to the Subgrantee in the following manner:

- Dwelling inspection reports are provided during exit conferences. If it is determined that training and technical assistance is necessary to resolve any workmanship and/or paperwork issues, the Subgrantee shall be referred to the third-party Technical Consultant or CSD Technical Support staff.
- Subgrantees are briefed on observations and potential findings generated by the monitoring visit and/or in-house review, usually through an exit conference.

Within 30 calendar days after each visit or in-house review, CSD will prepare a draft written report on its findings and observations and send it to the Subgrantee to review. CSD will address any findings, observations, or recommendations for which Subgrantee contests or needs clarification. After CSD finalizes the written report, it is provided to the Subgrantee. If corrective action is applicable, Subgrantees must submit a CAP.

#### **Monitoring Schedule**

The monitoring season for Field Representatives typically runs from March through the end of October. CSD monitors all Subgrantees annually through onsite visits or comprehensive desk reviews. Subgrantees with programmatic concerns or at high-risk may receive a comprehensive desk review and an onsite visit.

# Recordkeeping

All records maintained by Subgrantees must meet the 2 CFR Part 200, "Uniform Administrative Requirements for Cost Principles, and Audit Requirements for Federal Awards." Subgrantees are required to maintain all records pertaining to this program for a minimum period of three years after submission of the close-out report. Subgrantees must maintain all applicable records until resolution of all related audit and monitoring findings are completed. Addresses and installed measures of all completed units must be submitted to CSD. Employee and applicant records are required to be maintained in a confidential manner to assure compliance with the Information Practices Act of 1977, as amended, and the Federal Privacy Act of 1974, as amended.

Regarding re-weatherization policy changes made by DOE in 2021, CSD directed Subgrantees to maintain historical data for dwellings receiving weatherization services from a federal weatherization program within the last 15 years, and to use this information to verify the eligibility of a dwelling for DOE WAP services. Dwellings that received federal weatherization program services are prohibited from receiving additional DOE WAP services. This method of eligibility verification is essential to meet DOE WAP re-weatherization rules and will remain in effect until additional information regarding HUD and USDA weatherization data is provided by DOE.

## **Noncompliance**

If it has been determined that a Subgrantee cannot fulfill their contractual obligations, steps may be implemented to redistribute any remaining allocated funds to other Subgrantees. These funds will be redistributed to the nearest Subgrantee, if feasible, to provide services in the same service area. For designated high-risk Subgrantees, an independent financial audit may be performed.

#### **Termination Procedures**

CSD may commence suspension or termination proceedings based on nonperformance or material breach of Subgrantee contract. CSD may impose sanctions as provided in 2 CFR Section 200.339 which may include temporarily withholding cash payments, disallowing payment, suspending, or terminating the federal award, recommending suspension or debarment proceedings, withholding further federal awards, or taking other remedies that may be legally available.

Should it become necessary to terminate any Subgrantee or select new ones, the regulations governing such actions, (i.e., Title 10 of the Code of Federal Regulations Section 440.15 [c] and [d]), will be followed. Should termination of a Subgrantee during the current grant cycle become necessary, CSD will redistribute the allocations or unexpended balances to Subgrantees operating efficient programs to ensure that the services continue in the areas served by the Subgrantee being terminated.

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

#### Overview

One of the goals of program monitoring and report and records evaluation is to assess the need for training. CSD QA Inspectors conduct inspections throughout the program year. CSD Field Representatives conduct desk reviews and report evaluations on an ongoing basis in accordance with Section V.8.3 Monitoring Activities. Problems that qualify to be resolved through training and technical assistance will be addressed by the Field Representatives or other CSD staff, outside consultants, and occasionally by staff brought in from other Subgrantees.

To meet the long-term demand for a training facility in Southern California, CSD is in discussions with a Subgrantee located in the area for consideration as a new training facility. Before the facility can be utilized, several updates will be needed to ensure that the facility meets the required standards of CSD's weatherization programs. Once final approval has been attained, an memorandum of understanding between CSD and the training facility provider will be executed.

For a full description of CSD's training and technical assistance activities refer to Attachment P: DOE WAP Training and Technical Assistance Plan.

## V.9 Energy Crisis and Disaster Response Plan

The purpose of California's DOE disaster planning and relief response plan is to provide emergency services to low-income individuals and families affected by a disaster as determined by a Presidential or Gubernatorial order declaring either a federal or state emergency. DOE WAP provides limited support in a disaster response plan. Funds are limited to eligible weatherization activities and the purchase and delivery of weatherization materials.

To the extent that services are in support of eligible weatherization (or permissible reweatherization) work for eligible households, such expenditure is allowable. Allowable expenditures include:

- The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
- The cost of eliminating health and safety hazards, the elimination of which is necessary before the installation of weatherization materials.
- The cost to perform functions related to protecting the DOE investment such as weatherization materials, tools, equipment, weatherization vehicles, or protection of local Subgrantee weatherization files, and records during the initial phase of the disaster response.
- The cost to use weatherization vehicles and equipment to help assist in the disaster relief provided DOE is reimbursed per 2 CFR Part 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

The use of DOE funds for relief efforts is limited by the following:

- The total allowance for relief efforts is limited to a maximum allowance per dwelling unit allowed by the current program year.
- The total allowance for incidental repairs in support of the installation of weatherization materials is limited to the current maximum reimbursement for limited home repairs per Subgrantee contract.
- The total allowance for the installation of each weatherization measure is limited to the current maximum reimbursement per Subgrantee contract.
- The cost to pay for weatherization personnel to perform relief work in the community because of a disaster is not allowable.

Prioritization of weatherization requests within a disaster relief plan requires consideration of the following factors:

- Disaster relief services are only available to qualified low-income households directly affected by the declared disaster.
- DOE requires priority be given to identifying and providing weatherization services to the elderly, disabled, families with children, high residential energy users, and households with high energy burdens. However, it is permissible to prioritize households located in the disaster area if the households are eligible, meet one of the priorities above and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

 In the event of a declared federal or state disaster, weatherization crews may return to a unit reported as a completion to CSD that has been "damaged by fire, flood or act of God to be re-weatherized, without regard to date of weatherization." Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to materials is not covered by insurance or other form of compensation.

Prior to initiating disaster relief services, Subgrantees are required to submit a written plan to the CSD for approval outlining the specific services to be provided and the estimated costs necessary to support each type of activity. Activities are required to be reported monthly describing all relief efforts, expenditures, and demographics. Approved plans will be in effect for a maximum of six months but could be extended dependent upon the anticipated recovery period and the type of disaster involved.