

State of California
Department of Community Services and Development

Weatherization Assistance Program
for Low-Income Persons



2020 State Plan and
Application to the
U.S. Department of Energy

May 1, 2020

Gavin Newsom
Governor
State of California

Mark Ghaly
Secretary
California Health and
Human Services Agency

David Scribner
Acting Director
Department of Community
Services and Development

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Attachments referenced in the State Plan are available upon request by emailing wx@csd.ca.gov.

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		2. Type of Application: If Revision, select appropriate letter(s) <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation Other (specify): <input type="checkbox"/> Revision	
3. Date Received		4. Applicant Identifier:	
5a. Fed Entity Identifier:		5b. Federal Award Identifier: DE-EE0007907	
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. Organizational DUNS: 929578268	
d. Address:			
Street 1: 2389 Gateway Oaks			
Street 2:			
City: Sacramento			
County: SACRAMENTO County			
State: CA			
Province:			
Country: U.S.A.			
Zip / Postal Code: 958120000			
e. Organizational Unit:			
Department Name: Department of Community Services and Development		Division Name: Energy and Environmental Services	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: Mr		First Name: Jason	
Middle Name:			
Last Name: Wimbley			
Suffix:			
Title: Chief Deputy Director			
Organizational Affiliation: Department of Community Services and Development			
Telephone Number: 9165767109		Fax Number:	
Email: jason.wimbley@csd.ca.gov			

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

9. Type of Applicant:

A State Government

10. Name of Federal Agency:

U. S. Department of Energy

11. Catalog of Federal Domestic Assistance Number:

81.042

CFDA Title:

Weatherization Assistance Program

12. Funding Opportunity Number:

DE-WAP-0002020

Title:

2020 Weatherization Assistance Program

13. Competition Identification Number:

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.

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: 07/01/2019 b. End Date: 06/30/2021

18. Estimated Funding (\$):

a. Federal	16,647,203.00
b. Applicant	0.00
c. State	0.00
d. Local	0.00
e. Other	0.00
f. Program Income	0.00
g. TOTAL	16,647,203.00

19. Is Application subject to Review By State Under Executive Order 12372 Process?:

- a. This application was made available to the State under the Executive Order 12372 Process for review
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372

20. Is the applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation)

No

21. By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to**

I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency

Authorized Representative:

Prefix: Mr First Name: David

Middle Name:

Last Name: Scribner

Suffix:

Title: Acting Director

Telephone Number: 916-576-4383

Fax Number:

Email: david.scribner@csd.ca.gov

Signature of Authorized Representative:

Date Signed:

II. Budget Information

Program/Project Identification No.		Program/Project Title	
EE0007907		Weatherization Assistance Program	
Name and Address	State of California 2389 Gateway Oaks Sacramento CA 95833	Program/Project Start Date	07/01/2019
		Completion Date	06/30/2021

Section A - Budget Summary

Grant Program	Estimated Unobligated Funds (Federal)	New/Revised Budget (Federal)	Total
DOE WAP 2020		\$9,107,043	\$9,107,043
DOE WAP 2019		\$7,540,160	\$7,540,160
DOE WAP 2017, 2018		\$411,872	\$411,872
Totals		\$17,059,075	\$17,059,075

Section B - Budget Categories

Object Class Categories	Grantee Administration	Subgrantee Administration	Grantee T&TA	Subgrantee T&TA	Total
Personnel	\$186,164		\$108,156		\$294,320
Fringe Benefits	\$88,930		\$51,666		\$140,596
Travel	\$12,320		\$12,780		\$25,100
Equipment					\$0
Supplies	\$0		\$11,670		\$11,670
Contractual	\$406,219	\$855,678	\$922,108	\$1,472,028	\$3,656,033
Construction					\$0
Other Direct Costs	\$0		\$26,700		\$26,700
Total Direct Costs	\$693,633	\$855,678	\$1,133,080	\$1,472,028	\$4,154,419
Indirect Costs	\$138,727		\$226,615		\$365,342
Totals	\$832,360	\$855,678	\$1,359,695	\$1,472,028	\$4,519,761

Object Class Categories	Program Operations	Health and Safety	Liability Insurance		Total
Personnel					\$0
Fringe Benefits					\$0
Travel					\$0
Equipment					\$0
Supplies					\$0
Contractual	\$9,450,960	\$3,004,354	\$84,000		\$12,539,314
Construction					\$0
Other Direct Costs					\$0
Total Direct Costs	\$9,450,960	\$3,004,354	\$84,000	\$0	\$12,539,314
Indirect Costs					\$0
Totals	\$9,450,960	\$3,004,354	\$84,000	\$0	\$12,539,314

III. Budget Explanation

Personnel

Duties

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

Position	Description of Duties
Staff Services Manager III - Energy and Environmental Services Division	Manager provides staff supervision and oversees the Energy Division.
Assoc. Govt. Program Analyst - Energy and Environmental Services Division Support	Analyst develops contracts and related reporting forms for the weatherization programs.
Staff Services Manager II - Weatherization & Technical Support and Climate Investment	Manager provides staff supervision and oversees the Weatherization & Technical Support and Climate Investment Units
Staff Services Manager I (Specialist) - Weatherization & Technical Support and Climate Investment	Manager provides complex technical and IT coordination services in support of weatherization and utility assistance programs
Staff Services Manager I - Weatherization and Technical Support Unit	Manager provides staff supervision and administers departmental policies and programs. Participates in Policy Advisory Council meetings. Oversees development of policies, standards, contracts and trainings. Primary liaison to DOE.
Research Analyst II - Weatherization and Technical Support Unit	Analyst provides higher level technical and analytical support and training to Subgrantees and departmental staff. Help in the development of policies, standards, contracts, program guidance and energy audit reviews.
Assoc. Govt. Program Analyst - Weatherization and Technical Support Unit (2)	Analysts provide technical and analytical support and training to Subgrantees and departmental staff. Help in the development of policies, standards, contracts, program guidance and energy audit reviews.
Staff Services Manager I - Climate Investment Unit - Policy/QAI	Manager performs oversight of the QA monitoring provided by third-party inspection contractor and oversees separate QA inspections performed by Grantee staff.
Assoc. Govt. Program Analyst - Climate Investment Unit - Policy/QAI	Analysts perform field monitoring of the third-party inspection contractor and separate QA inspections of Subgrantees.
Staff Services Manager II – Field & Weatherization Services and Consumer Provider Assistance	Manager provides staff supervision and administers departmental policies and programs. Participates in Policy Advisory Council meetings.
Staff Services Manager I - Field & Weatherization Services Unit	Manager provides staff supervision and oversight of the monitoring of Subgrantees.
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit (5)	Analysts perform day-to-day program administration, review of fiscal and programmatic data reports, annual monitoring activities and program analysis for monitoring purposes.
Staff Services Analyst - Field & Weatherization Services Unit	Analyst provides administrative and programmatic support to the Field & Weatherization Services Unit

Duties - continued

Position	Description of Duties
Staff Services Manager I - Energy Division Support Services	Manager provides staff supervision and oversight of the support services for CSD staff and Subgrantees
Assoc. Govt. Program Analyst - Energy Division Support Services (2)	Analysts perform process DOE contracts, provide weatherization database support, and conduct Subgrantee payment reconciliation.
Staff Services Analyst - Energy Division Support Services (2)	Analysts perform process DOE contracts, provide weatherization database support, and conduct Subgrantee payment reconciliation.
Management Services Technician - Energy Division Support Services	Analysts perform process DOE contracts, provide weatherization database support, and conduct Subgrantee payment reconciliation.

Direct Personnel Compensation

Salaries were based upon a 2-year 2019-20 program.

Position	Salary (2 years)	Time	Direct Pay
Staff Services Manager III - Energy and Environmental Services Division	\$ 222,720	6.00%	\$ 13,363
Assoc. Govt. Program Analyst - Energy and Environmental Services Division Support	154,704	30.00%	46,411
Staff Services Manager II - Weatherization & Technical Support and Climate Investment	200,448	2.00%	4,009
Staff Services Manager I (Specialist) - Weatherization & Technical Support and Climate Investment	146,976	2.00%	2,940
Staff Services Manager I - Weatherization and Technical Support Unit	182,592	28.00%	51,126
Research Analyst II - Weatherization and Technical Support Unit	150,240	4.00%	6,010
Assoc. Govt. Program Analyst - Weatherization and Technical Support Unit	154,704	4.00%	6,188
Assoc. Govt. Program Analyst - Weatherization and Technical Support Unit	148,944	4.00%	5,958
Staff Services Manager I - Climate Investment Unit - Policy/QAI	179,040	3.00%	5,371
Assoc. Govt. Program Analyst - Climate Investment Unit - Policy/QAI	102,744	2.00%	2,055
Staff Services Manager II – QA and Field Operations	200,448	8.00%	16,036
Staff Services Manager I - Field & Weatherization Services Unit	173,904	12.00%	20,869

Direct Personnel Compensation - continued

Position	Salary	Time	Direct Pay
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	151,920	12.00%	18,230
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	154,704	12.00%	18,565
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	154,704	12.00%	18,565
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	154,704	12.00%	18,564
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	137,736	12.00%	16,528
Staff Services Analyst - Field & Weatherization Services Unit	124,296	10.00%	12,430
Staff Services Manager I - Energy Division Support Services	182,592	1.00%	1,826
Assoc. Govt. Program Analyst - Energy Division Support Services	123,576	1.00%	1,236
Assoc. Govt. Program Analyst - Energy Division Support Services	102,744	1.00%	1,027
Staff Services Analyst - Energy Division Support Services	102,744	1.00%	1,027
Staff Services Analyst - Energy Division Support Services	102,744	1.00%	1,027
Management Services Technician - Energy Division Support Services	99,180	5.00%	4,959
Total Direct Personnel Compensation			\$ 294,320

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	31.08%
Payroll Taxes – OASDI	6.20%
Payroll Taxes - Medicare	9.04%
Medical Insurances	1.45%
Total Fringe Benefit Rate	47.77%

Fringe Benefits - continued

Position	Benefit
Staff Services Manager III - Energy and Environmental Services Division	\$ 6,384
Assoc. Govt. Program Analyst - Energy and Environmental Services Division Support	22,171
Staff Services Manager II - Weatherization & Technical Support and Climate Investment	1,915
Staff Services Manager I (Specialist) - Weatherization & Technical Support and Climate Investment	1,404
Staff Services Manager I - Weatherization and Technical Support Unit	24,423
Research Analyst II - Weatherization and Technical Support Unit	2,871
Assoc. Govt. Program Analyst - Weatherization and Technical Support Unit	2,956
Assoc. Govt. Program Analyst - Weatherization and Technical Support Unit	2,846
Staff Services Manager I - Climate Investment Unit - Policy/QAI	2,566
Assoc. Govt. Program Analyst - Climate Investment Unit - Policy/QAI	982
Staff Services Manager II – QA and Field Operations	7,660
Staff Services Manager I - Field & Weatherization Services Unit	9,969
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	8,708
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	8,868
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	8,868
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	8,868
Assoc. Govt. Program Analyst - Field & Weatherization Services Unit	7,895
Staff Services Analyst - Field & Weatherization Services Unit	5,938
Staff Services Manager I - Energy Division Support Services	872
Assoc. Govt. Program Analyst - Energy Division Support Services	590
Assoc. Govt. Program Analyst - Energy Division Support Services	491
Staff Services Analyst - Energy Division Support Services	491
Staff Services Analyst - Energy Division Support Services	491
Management Services Technician - Energy Division Support Services	2,369
Total Fringe Benefits	\$ 140,596

Travel

Purpose of Trip	Number of Trips	Average Cost per Trip	Total
Energy OutWest Regional Conference Planning & Board Meetings - various locations	3	\$ 1,636	\$ 4,908
Energy OutWest Training Conference - Austin TX (leveraged with LIHEAP)	2	\$ 890	1,780

Travel - continued

Purpose of Trip	Number of Trips	Average Cost per Trip	Total
NASCSP Training Conferences - various locations	4	\$ 1,395	5,580
National Home Performance Conference & Trade Show - Austin TX (leveraged with LIHEAP)	1	\$ 450	450
CSD Staff Training - PG&E Energy Training Center, EPA Renovator, QCI (leveraged with LIHEAP)	5	208	1,040
3rd Party Inspector Training provided by CSD Staff (leveraged with LIHEAP)	4	80	320
Subgrantee Monitoring Visits by CSD Field Staff (leveraged with LIHEAP)	14	660	9,240
3rd Party Inspector Monitoring by CSD QA Staff (leveraged with LIHEAP)	6	297	1,782
Total Travel			\$ 25,100

1) All budget estimations are based upon historical data incurred under previous grants. Costs for all travel are leveraged with the LIHEAP weatherization program with the exception of the Energy OutWest meetings and QCI training.

Supplies

General Category	Justification and Basis of Cost	Total Cost
QA Diagnostics Tools and Equipment	For CSD QA inspection purposes Cost basis - Published list price	\$ 9,740
QA Field Supplies	For CSD QA inspection purposes Cost basis - Published list price	1,930
Total Supplies		\$ 11,670

Contracts and Subgrants

Name of Proposed Sub	Basis of Cost	Total Cost
Weatherization Service Providers	Net allocation after Grantee admin and T&TA. Cost basis – allocated by modified 3-factor formula. Refer to Annual File IV.1 Subgrantees for allocation breakdown. Refer to Master File V.8.1 Program Management - Allocation Formula	\$ 14,867,020

Contracts and Subgrants - continued

Name of Proposed Sub	Basis of Cost	Total Cost
Technical Assistance – RHA Inc.	Provide technical assistance and training to CSD and Subgrantees as assigned. Cost basis – competitive bid contract Leveraged with LIHEAP and other state programs	1,160,627
Third Party Inspections – ConSol	Conduct weatherized unit inspections; Cost basis - competitive bid contract Leveraged with LIHEAP	124,300
SHPO Review – Department of General Services	Conduct full SHPO reviews of assessed dwellings. Leveraged with LIHEAP Cost basis – competitive bid contract, 5 year agreement Leveraged with LIHEAP	32,000
Learning Management System - S&P Technology Solutions	Initial setup and implementation of LMS system Cost basis - competitive bid contract, month-to-month after implementation Leveraged with LIHEAP	11,400
Total Contracts and Subgrants		\$ 16,195,347

Other Direct Costs

Description	Justification	Total Cost
Conference Fees	CSD Staff attendance at NASCSP weatherization training conferences in Fall 2019, Winter 2020, Fall 2020 and Winter 2021. 1 attendee per conference. Cost Basis - Established registration fees	\$ 2,700
Conference Fee	CSD Staff attendance at one National Home Performance Conference in Spring 2021. 1 attendee. Cost Basis - Established registration fees	\$ 400
Conference Fee	Sponsorship fee for biennial DOE-sponsored Energy OutWest Weatherization Training Conference. Includes free registration. 2 attendees. Cost basis - Established fee for premier sponsorship	\$ 20,000

Other Direct Costs - continued

Description	Justification	Total Cost
Training Fees	New staff attendance at PG&E Energy Training Center for weatherization training - Basic Weatherization, Combustion Appliance Safety, and Duct and Shell Sealing. 1 attendee per training. Cost Basis - Established registration fees	\$ 2,100
Training Fees	Staff attendance for EPA RRP training at accredited EPA trainer. 1 attendee. Cost Basis - Established registration fees	\$ 300
Training Fee	New inspector attendance for QCI training and certification at accredited BPI Test Center. 1 attendee. Cost Basis - Established registration fees	\$ 1,200
Total Contracts and Subgrants		\$ 26,700

Indirect Costs

Refer to Attachment C – Explanation of Indirect Costs.

Carryover

Refer to Attachment D – Program Year 2019-20 Carryover.

Note: Other weatherization programs that are administered by CSD are leveraged to fund wages, benefits and other program expenditures.

IV.1 Subgrantees

Subgrantee (County)	Planned Funds	Planned Units
Amador-Tuolumne Community Action Agency (Amador, Calaveras, Tuolumne)	\$ 3,600	1
Campesinos Unidos, Inc. (Imperial, San Diego - Area A)	\$ 779,444	\$ 89
Central Coast Energy Services (Marin, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz)	\$ 499,874	\$ 57
Central Valley Opportunity Center, Inc. (Stanislaus)	\$ 517,162	\$ 59
Community Action Agency of Butte Co., Inc. (Butte)	\$ 263,138	\$ 30
Community Action Commission of Santa Barbara County, Inc. (Santa Barbara)	\$ 81,552	\$ 9
Community Action Partnership of Kern Co. (Kern)	\$ 250,000	\$ 29
Community Action Partnership of Orange County (Orange)	\$ 364,011	\$ 42
Community Action Partnership of Riverside County (Riverside)	\$ 256,992	\$ 29
Community Action Partnership of San Bernardino County (San Bernardino)	\$ 605,285	\$ 69
Community Resource Project, Inc. (Sacramento, Sutter, Yuba)	\$ 2,264,300	\$ 260
Community Services and Employment Training, Inc. (Tulare)	\$ 143,943	\$ 17
Contra Costa Employment and Human Services Department (Contra Costa)	\$ 287,472	\$ 33
Economic Opportunity Commission of San Luis Obispo Co. (San Luis Obispo)	\$ 21,315	\$ 2
Fresno Co. Economic Opportunities Commission (Fresno)	\$ 917,690	\$ 105
Glenn County Human Resource Agency (Colusa, Glenn, Trinity)	\$ 259,574	\$ 30
Great Northern Services (Siskiyou)	\$ 140,000	\$ 16
Inyo Mono Advocates of Community Action, Inc. (Inyo, Mono)	\$ 62,238	\$ 7
Kings Community Action Org., Inc. (Kings)	\$ 380,689	\$ 44
Long Beach Community Action Partnership (Los Angeles - Area C)	\$ 331,295	\$ 38
Maravilla Foundation (Los Angeles - Area A)	\$ 1,231,894	\$ 141
Merced County Community Action Agency (Madera, Merced)	\$ 2,590,858	\$ 297
Metropolitan Area Advisory Committee (San Diego - Area B)	\$ 492,789	\$ 57

Subgrantee (County)	Planned Funds	Planned Units
North Coast Energy Services (Lake, Mendocino, Napa, Solano, Sonoma, Yolo)	\$ 112,500	\$ 13
Pacific Asian Consortium in Employment (Los Angeles - Area B)	\$ 637,500	\$ 73
Project Go, Inc. (Nevada, Placer)	\$ 116,400	\$ 13
Redwood Community Action Agency (Humboldt, Modoc)	\$ 377,208	\$ 43
San Joaquin County Department of Aging and Community Services (San Joaquin)	\$ 526,422	\$ 60
Self Help Home Improvement Project (Shasta, Tehama)	\$ 186,283	\$ 21
Spectrum (Alameda)	\$ 165,592	\$ 19
Total	\$ 14,867,020	\$ 1,703

IV.2 WAP Production Schedule

Weatherization Plans	Annual Total
Total Units (excluding reweatherized)	1,703
Rewatherized Units	-
Note: Planned units by quarter or category are no longer required , no information required for persons.	

Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A.	Total of Vehicles and Equipment Budget	\$0
B.	Total Units to be Weatherized, from Production Schedule above	1,703
C.	Units to be Rewatherized, from Production Schedule above	-
D.	Total Units to be Weatherized, plus Planned Rewatherized Units from Production Schedule above (B plus C)	1,703
E.	Average Vehicles and Equipment cost per Dwelling Unit (A divided by D)	\$0
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F.	Total of Funds for Program Operations	\$9,450,960
G.	Total Units to be Weatherized, plus Planned Rewatherized Units from Production Schedule above (total from D above)	1,703
H.	Average Cost per Dwelling Unit, less Vehicles and Equipment (F divided by G)	\$5,550
I.	Average Cost per Dwelling Unit for Vehicles and Equipment (total from E)	\$0
J.	Total Average Cost per Dwelling Unit (H plus I)	\$5,550

IV.3 Energy Savings

Method used to calculate savings: WAP algorithm

	<i>Units</i>	<i>Savings Calculator (Mbtus)</i>	<i>Energy Savings</i>
This Year Estimate	1,703	29.3	49,898
Prior Year Estimate	906	29.3	26,546
Prior Year Actual	1,555	29.3	45,562

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 providers that administer the Community Services Block Grant to increase participation from non-energy service providers. Membership includes several organizations that are independent from the weatherization Subgrantee network.

Agency	Contact Name
Amador-Tuolumne CAA	Joe Bors
Berkeley CAA	Andrew King
CAA Butte	Thomas Tenorio
CAB Santa Cruz	Maria De La Garza
Calaveras-Mariposa Community Action Agency	Kristen Brink
CAP of Kern	Jeremy Tobias
CAP of Riverside	Brenda Freeman
CAP of San Bernardino	Patricia Nickols-Butler
CAP of San Luis Obispo County, Inc.	Elizabeth Steinberg
CAP of Solano	Kathy Lawton-Caesar
CAP of Sonoma	Susan Cooper
CET	Hermalinda Sapien
Calif Human Development	Anita Maldonado
City of LA CDD	Jan Perry
City of Oakland DHS	Sara Beford
Community Action Commissioin of Santa Barbara	Kemba Lawrence
Community Action Napa Valley	Drene Johnson
Community Action of Ventura County, Inc.	Dr. Cynder Sinclair
Community Action Partnership of Orange County	Sally Andreatta
Community Action Partnership of San Luis Obispo	Jim McNamara
Contra Costa EHSD	Kathy Gallagher
County of LA Dept of PSS	Lupe Gamez
County of San Diego HHS CAP	Dale Fleming
County of Yolo Dept of ESS	Joan Planell
CUI	Jose Lopez
CVOC	Jorge De Nava Jr.
Del Norte Senior Center	Charlaine Mazzei
El Dorado County Health and Human Services Agency	Patricia Charles-Heathers
Foothill Unity Center	Betty McWilliams
Fresno Co. Economic Opportunities Commission	David Wear
Glenn County HRA	Christine Zoppi
IMACA	Charles Broten
Karuk Tribe of Calif	Russell Attebery
Kings CAO	Jeff Garner
Lassen/Plumas/Sierra CAA	Roger Diefendorf
Los Angeles County NAI Commision	Sheryl Spiller
Merced County Community Action Agency	Mike Polinko
Modoc-Siskiyou CAA	Chester Robertson
Monterey County CAP	Margarita Zarraga
Nevada County Dept of HCV	Rob Choate
North Coast Oppprtunities	Patty Bruder
Northern California Indian DC	Terry Coltra
Project Go, Inc.	Lynda Timbers

Agency	Contact Name
Proteus Inc	Mike McCann
Redwood CAA	Val Martinez
Sacramento Employment and Training Agency	Kathy Kossick
Sacred Heart Community Service	Poncho Guevara
San Benito Dept of CSWD	Jim Rydingsword
San Joaquin County Dept of Aging & Community Services	Michael Miller
San Mateo Co HSA	Iliana Rodriguez
Shasta CAA	Laura Burch
Sutter County CAA	Brynda Stanix
Tehama Co CAA	Amanda Sharp
Yuba County CSC	Wendy Hartman

IV.6 Public Hearings

The public hearing will be conducted by webinar on Thursday, April 30, 2020, at 9:00 a.m. PST at the Department of Community Services and Development. To register for the webinar, go to:

<https://attendee.gotowebinar.com/register/353310875622204684>

Notices for the hearing were posted on the CSD Public Website and social media platforms on April 20, 2020.

Comments and questions may be submitted to wx@csd.ca.gov with “DOE State Plan” in the subject line. Comments will be accepted until 5:00 p.m. PST on April 30, 2020.

See Attachment E Public Hearing Public Notice and Proof of Publication and Attachment F Public Hearing Transcripts.

IV.7 Miscellaneous

Recipient Business Officer

Kathy Andry
Deputy Director of Energy and Environmental Services Division
Kathy.Andry@csd.ca.gov
916-576-7132

Recipient Principal Investigator

Leslie Campanella
Program Manager, Technical Support Unit
Leslie.Campanella@csd.ca.gov
916-576-7131

Redistribution of Funds

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

- A Subgrantee cannot meet their production goals.
- A Subgrantee is not in compliance with program requirement or other extenuating circumstances.
- A Subgrantee has determined that DOE funds are insufficient to administer and maintain the DOE program 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.

American Customer Satisfaction Index (ACSI)

DOE utilized the ACSI to survey Subgrantees to gather feedback on various aspects of Grantee program operation and to identify opportunities for improvement. To ensure that the maximum benefit is achieved from this process, CSD developed an action plan to enhance program management and quality improvements for implementation during the current grant year based upon survey results. Refer to Appendix G DOE WAP State Level ACSI Survey Response.

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

CSD uses the federal poverty level of 200% as determined by the Office of Management and Budget. Eligibility is based on the household's total monthly gross income, which cannot exceed the income guidelines as follows:

Household Size	DOE Monthly Income 200% Federal Poverty Effective 7/1/20
1	\$2,126.67
2	\$2,873.33
3	\$3,620.00
4	\$4,366.67
5	\$5,113.33
6	\$5,860.00
7	\$6,606.67
8	\$7,353.33
9	\$8,100.00
10	\$8,846.67
11	\$9,593.33
12	\$10,340.00
13	\$11,086.67
14	\$11,833.33
15	\$12,580.00
16	\$13,326.67
17	\$14,073.33
18	\$14,820.00
19	\$15,566.67
20	\$16,313.33
21	\$17,060.00
22	\$17,806.67
23	\$18,553.33
24	\$19,300.00
25	\$20,046.67

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 DOE income guidelines. Priority is given to identifying and providing weatherization assistance to elderly persons; persons with disabilities; and families with children under 19. (Attachment H – CSD Eligibility and Verification Guide (rev. 09/01/2019).

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

The Welfare Reform Act, officially referred to as the Personal Responsibility and Work Opportunity Act of 1996, H.R. 3734, placed specific restrictions on the eligibility of aliens for “federal means-tested public benefits” for a period of five years. As defined in a Federal Register notice dated August 26, 1997 (62 FR 45256) the Department of Health and Human Services (HHS) is interpreting “federal means-tested public benefits” to include only those benefits provided under Federal means-tested, mandatory spending programs. HHS Information Memorandum LIHEAP-IM-25 dated August 28, 1997, states that all qualified clients, regardless of when they entered the U.S., continue to be eligible to receive assistance and services under the Low-Income Home Energy Assistance Program (LIHEAP) if they meet other program requirements.

To ensure program continuity between LIHEAP and DOE weatherization for all Subgrantees operating both programs, the DOE Weatherization Assistance Program will follow the interpretation as adopted by HHS.

The DOE and LIHEAP weatherization are in compliance with LIHEAP-IM-99-10, issued June 15, 1999, which states that weatherization in a multifamily building is not a covered activity for status verification.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation.

Subgrantees 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.

Describe reweatherization compliance.

Weatherization services for a dwelling unit previously weatherized using DOE funds are not allowable except if:

- A dwelling unit has been damaged by fire, flood, or act of nature and repair of the damage to weatherization materials is not paid for by insurance; or

- A dwelling unit weatherized using DOE WAP or other Federal program funds on or before prior to September 30, 1994 needs further weatherization assistance.

Each dwelling must receive a new assessment, diagnostic testing and energy audit which will take into account any previous energy conservation improvements to the dwelling. Only those energy conservation measures at or above a savings-to-investment ratio (SIR) of 1 are allowable.

Based on DOE's recent clarification on re-weatherization restrictions, CSD updated the DOE WAP policy to ensure consistency with DOE WAP grant rules and requirements. Effective December 20, 2019, when considering previously weatherized dwellings for DOE services, the following rules shall apply:

- A dwelling shall not be weatherized using DOE WAP funds if the dwelling has previously been weatherized using DOE WAP or DOE ARRA grant funds after September 30, 1994.
- A dwelling may be weatherized using DOE WAP funds if the dwelling has previously been weatherized using LIHEAP funds.
- A dwelling may be weatherized using DOE WAP funds if the dwelling was previously weatherized by DOE WAP or DOE ARRA grant funds and qualifies for disaster relief services in accordance with an approved DOE Disaster Relief Plan.

To confirm a dwelling's eligibility for DOE WAP, Subgrantees must check their historical dwelling service records to confirm there is no prior history of DOE WAP services for the dwelling and verify the household's income is within the program income eligibility guidelines, before committing to provide 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 it 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 two or more dwelling unit.

Shelter- A dwelling unit or units whose principal purpose is to house for ninety (90) days or less on a temporary basis, individuals 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 dwelling structure containing no more than one dwelling unit.

Describe how rental units/multifamily buildings will be addressed.

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 to prevent property-owners from raising rents within two years due to building improvement resulting from weatherization work, and disclosures of tenant complaint procedures and property resale restrictions, and permission to enter the property for purposes of this program. The agreements are signed by owner/occupants, tenants and rental property owners prior to the dwelling receiving weatherization services.

CSD has adequate procedures in place to process tenant complaints regarding any property-owner violation of weatherization service agreement terms and conditions.

CSD will abide by 10 CFR Section 440.22, ensuring that not less than 66% of the units in multi-family buildings (50% 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 17-4 that streamlines the qualification of certain HUD multi-family properties for weatherization work, including streamlining income eligibility determination and ensuring that benefits accrue primarily to the low-income residents. CSD provide continuous training to its Subgrantees in applying the streamlined provisions of the program guidance memorandum.

Describe the deferral process.

Deferral takes place upon discovery of circumstances giving rise to the feasibility 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 CSD Weatherization Deferral Form, signed by the client, provides an area for Subgrantee 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 each section of the CSD Weatherization Health and Safety Plan (Attachment I) and the CSD Field Guide Section 3.12.1 Deferral Conditions (Attachment J).

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 very low amount of funding that would be available to their organization. The funding would not be enough to start-up and sustain a localized program.

V.2 Selection of Areas to Be Served

CSD subcontracts with Subgrantees to provide DOE services throughout the state in their designated service area. 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 assigned area for the DOE program, 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.

It should be noted that all Subgrantees receive funding under CSD's Low-Income Home Energy Assistance Program (LIHEAP) 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 and at levels significantly higher than WAP.

V.3 Priorities for Service Delivery

CSD will ensure by contract that its Subgrantees give priority to weatherizing dwellings owned or occupied by low-income persons who are particularly vulnerable to include: elderly persons, persons with disabilities, and families with children under 19 years of age. 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 established service priority considerations.

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 sixteen 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 for those site-built dwellings, mobile home and multi-family buildings existing in all climate zones.

The Subgrantees use the data included in the Priority List Policy or Single-Family/Small Multi-Family Energy Audit 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 V California Energy Commission Climate Zones by County and City and Attachment W California Building Climate Zone 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 T&TA activities and priorities. CSD is in the process of ascertaining how to better capture energy savings differences between Subgrantees.

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 audit procedures and 10 CFR 440 Appendix A. CSD has developed several manuals in compliance with WPN 15-4 to guide Subgrantees in the proper delivery of weatherization services. The primary field guidance is the CSD Weatherization Installation Standards (WIS Rev. October 2017) and the CSD Field Guide (Rev. October 2017) which serve as the benchmarks for quality workmanship and as a tool for measuring quality performance. CSD released the Energy Single-Family/Small Multi-Family Energy Audit Protocol, Priority List Policy and Multi-Family Energy Audit Protocol offering further detail about specific measures and their installation hierarchy. Per the DOE requirement to submit updated protocols every five years, in February of 2020 CSD submitted new energy audit protocols to DOE for approval. CSD is awaiting approval from DOE for the new protocols. CSD issues Energy CSD Energy Program Notices (CPN) to introduce new policies related to such subjects as asbestos removal, callbacks and audit protocols. Energy Program Advisories (CPA) are issued to provide clarity on the WIS and Field Guide, as needed. In addition, CSD has a technical assistance hotline manned by CSD technical staff.

The WIS incorporates the Standard Work Specifications (SWS) for Home Energy Upgrades pertaining to material and installation specifications. The CSD Field Guide provides guidance on key work procedures, outlines the field policies for the Subgrantees and works in conjunction with the WIS. Both manuals are available electronically for Subgrantees and their contractors on CSD's Providers Site. In response to the ACSI survey results received from CSD's DOE providers, one of the main issues identified was the lack of clarity and inconsistencies between CSD's weatherization installation standards and field guide. As a result, CSD convened a 24-member weatherization improvement committee made up a representative group of executive directors, program managers and field staff to perform a comprehensive review of the current standards and field guide. California is completing this comprehensive review and revision of its Weatherization Installation Standards and Field Policies this year. These revisions are required to simplify the standards, remove inconsistencies, remove implementation barriers, and incorporate the most current SWS standards. This review and revision will combine both the CSD Field Guide and CSD WIS (Weatherization Installation Standards) into a concise Technical Reference Manual (TRM). The new TRM is scheduled to be submitted to DOE for approval on June 1, 2020. Trainings will be provided for Subgrantees on using the TRM, with an expected adoption date of January 1, 2021. CSD initially scheduled October 1, 2020, as the effective date. Due to the COVID-19 pandemic, however, CSD extended the effective date to allow agencies more time to prepare and address any staff turnover. Additionally, virtual training is being developed in lieu of the planned regional trainings.

CSD contracts contain language requiring Subgrantees to adhere to the latest version of WIS and Field Guide, Energy Program Notices, OMB and other federal and state guidelines and regulations. 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 acknowledging they understand the expectations of performing work with WAP funds. Full detail of these requirements can be obtained by referring to Attachment K WPN 15-4 Quality Work Plan.

V.5.2 Energy Audit Procedures

The CSD Priority Lists were updated to incorporate utility rates for natural gas and electricity and continue to be updated on an annual basis. CSD Single-Family/Small Multi-Family Energy Audit Protocol and CSD Large Multi-Family Energy Audit Protocol were last published in October of 2017 and approved by DOE on April 20, 2016. REM/Design continues to be used for single-family dwellings, mobile homes and multifamily buildings with 25 or fewer dwelling units, where each unit is independently heated and cooled, and has its own domestic hot water heater. TREAT will continue to be used for all multifamily buildings, except REM/Design may be used for those multifamily buildings of 25 or fewer units, as specified above. Large multifamily buildings where the TREAT energy audit is applicable are 100% energy audit-driven. The protocols coincide with the release of the updated CSD standards and field guide.

Per the DOE requirement to submit updated protocols every five years, in February of 2020 CSD submitted new energy audit protocols to DOE for approval. CSD is awaiting approval from DOE for the new protocols.

CSD is currently in the process of updating the WIS and Field Guide and also combining them into one cohesive document entitled Technical Reference Manual (TRM). Publishing of the TRM will take place on June 30, 2020. Trainings will be provided for Subgrantees on using the TRM, with an expected adoption date of January 1, 2021. CSD initially scheduled October 1, 2020 as the effective date. Due to the COVID-19 pandemic, however, CSD extended the effective date to allow agencies more time to prepare. Additionally, virtual training is being developed in lieu of the planned regional trainings. The TRM also includes new Energy Audit Requirements for Ancillary Items, Duct Sealing, Heating, Cooling, and Water Heating, Infiltration reduction, Insulation, Incidental Repairs, and Windows and Doors.

V.5.3 Final Inspection

Subgrantees are required to review and inspect all dwellings weatherized. A statement on the CSD Weatherization Dwelling Assessment or contractor's equivalent form certifies that all required measures were installed in accordance with contract requirements and shall be signed and dated by the installer.

Subgrantees are required to have 100% of their completed units inspected by a Certified Quality Control Inspector who has not performed any of the weatherization work on the inspected unit, including any form of assessment, and has met CSD training and DOE certification requirements. For very small Subgrantees where staffing is so limited, it may not be feasible to have a separation of duties between an assessor/auditor and inspector. Exemptions will be granted on a case-by-case basis. CSD will conduct a minimum of 10% quality assurance inspections for all Subgrantees.

If there is not a Certified Quality Control Inspector 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 inspections of installed weatherization measures are performed by a contracted third party and CSD QC inspectors. 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.

V.6 Weatherization Analysis of Effectiveness

How is the effectiveness of Subgrantee weatherization assessed?

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

- 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
- The percentage of contracted funds expended
- Subgrantee staff turnover

CSD's Field Representatives, perform programmatic evaluations. As part of the programmatic evaluations process and Monitoring Scope, Subgrantees are required to submit various internal Policies and Procedures, 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 and maintains 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 homes weatherized
- Program compliance

Development of automatic comprehensive analysis and reporting of the data and enhanced reporting is continuing. All changes with respect 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. To help ensure these changes are effectively communicated and implemented, training may be required depending upon the nature of the change(s).

How are the comparisons used in the development of T&TA activities and priorities?

The 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 barriers whether programmatic or operational.
- To discuss solution options including but not limited to, mentoring and training.
- Assist the identification of best practices supporting strong and effective program administration and service delivery.

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

How are the training needs being assessed?

Training needs are being 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 severe training-related problems can result in multiple visits by field and QA staff to assess improvement, the need for additional training, or conduct comprehensive investigations.

How is the Grantee incorporating monitoring feedback?

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

- Programmatic changes.
- Updates to the Weatherization Installation Standards (WIS) and/or Field Guide. CSD developed the Technical Reference Manual (TRM), which combines the WIS and Field Guide into one document, with substantial input from agencies. The new TRM is scheduled to be submitted to DOE for approval on June 1, 2020, with an implementation date of January 1, 2021.
- Supplemental trainings are provided, as needed.
- Resource material is developed and disseminated to the network, and subsequently archived electronically, on our Subgrantee network accessible “provider’s” 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 three formats: hardcopy, automated (Excel with formulated fields) and electronic (iPad/tablet application). Subgrantees are encouraged to implement the automated or electronic applications for field use. These forms will help with standardization of data collection and provide added value in the field.
- The Subgrantees’ software vendors have developed electronic versions of CSD’s assessment form to be compatible with their local systems. Subgrantees can opt to use the electronic version or hardcopy version developed by CSD or their internal staff.
- In 2019 CSD formed a Weatherization Improvement Project, whose sole purpose is to update the Weatherization Installation Standards (WIS) and Field Guide. Subgrantees provided valuable input that CSD will incorporate into the new Technical Reference Manual (TRM). The new TRM is scheduled to be submitted to DOE for approval on June 1, 2020, with an effective date of January 1, 2021. Due to the COVID-19 pandemic CSD

extended the implementation period to six months to allow agencies more time to prepare. Additionally, virtual training is being developed in lieu of the planned regional trainings.

How is the Grantee tracking Subgrantee performance reviews?

Findings by Field Representatives and the CSD 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 financial reviews will occur.

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

Over the period of five years, CSD has seen a significant drop in hazardous fails from our state inspections. Failures in other areas have also improved. We expect to see a drop-in paper fails, diagnostic issues, and installation priority problems once automated assessment and diagnostic forms are fully implemented.

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

In times past, CSD has had to place Subgrantees on high risk status, and when necessary, remove 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 repository system monthly. The weatherization project file uploads are subjected to additional validations which improve the overall quality of electronic reported project records from Subgrantees to CSD. CSD continues to design specific reports to identify compliance issues and provide statistical feedback for administrative purposes.

Are there technical and financial systems that have been reviewed?

Data transfer rules were issued to the two software vendors who provide reporting software at the local level for the Subgrantee network. From a review perspective, the systems must incorporate these rules to successfully upload data and have it pass the validations that have been implemented. These data transfer rules continue to be expanded and enhanced to validate additional programmatic requirements.

What has the Grantee done in the area of market analysis to ensure particular measures are being costed accurately?

During 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 appropriate or reasonable. 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.

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 Weatherization Standards and Field Guide. Subgrantees shall correct all safety hazards resulting from weatherization measure installation and relating to heating/cooling sources such as combustion appliances (carbon monoxide, back-drafting, etc.) and indoor air quality (adding mechanical ventilation, adding mechanical ventilation, and installing carbon monoxide alarms). A combustion appliance safety check shall be performed on all dwelling units that contain gas appliances. Clients are informed in writing of any health and safety issues that are found in the dwelling that cannot be remediated within the parameters of the weatherization program.

Subgrantees will work in a lead-safe manner and will comply with the Environmental Protection Agency rules in 40 CFR Part 745, Lead; Requirements for Hazard Education Before Renovation of Target Housing; Final Rule, on applicable dwellings and the CSD Lead-Safe Weatherization Policy (LSW). The CSD Weatherization Installation Standards (WIS), CSD Field Guide, LSW Policies and LSW training have been updated to meet the latest DOE and EPA LSW requirements.

Health and Safety Plan has been currently updated and reflects ASHRAE 62.2-2016 and SWS requirements. CSD forms and standards have been revised to reflect the new requirements and calculations effective October 1, 2017. ASHRAE 62.2-2016 (and corresponding 2017 Addenda Supplement) has been incorporated specifically with regards to shell leakage testing, shell sealing and mechanical ventilation. All components of WPN 17-7 Weatherization Health and Safety Guidance have been addressed in CSD Weatherization Health and Safety Plan (Attachment I).

The average expenditure for health and safety hazard mitigation is 32% of program operations. California's older housing stock requires a larger investment of health and safety measures to resolve carbon monoxide hazards and other health and safety concerns as required by California's state and local building codes. Over the last several years, CSD has deferred more of the health and safety services to its LIHEAP emergency heating and cooling program. Anticipating that health and safety services remain constant, CSD expects that the DOE grant will assume its share of health and safety costs consistent with expenditures levels. Additionally, although several Subgrantees leverage their DOE WAP program with utility weatherization programs, the narrowly defined standards of these programs limit the replacement of combustion appliances to owner-occupied units only. Another contributing factor is the temperate climate zones in some parts of the state where the investment in standard weatherization measures is proportionately lower; however, health and safety services remain constant.

Health and safety costs will be tracked on a separate line item in the budget and the expenditure reports and will not be included in the average cost per dwelling. The rate calculations are included in the CSD Weatherization Health and Safety Plan (Attachment I).

V.8 Program Management

V.8.1 Overview and Organization

CSD is one of several departments under the auspices of the California Health and Human Services Agency (CHHSA). CSD has been serving low-income communities for over 50 years. CSD has traditionally partnered with a network of private, non-profit and local government organizations, dedicated to reducing poverty by helping low-income individuals and families achieve and maintain self-sufficiency, meet their home energy needs, and reduce their utility costs through energy efficiency upgrades and access to clean renewable energy.

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

- U.S. Department of Health & Human Services Community Services Block Grant
- U.S. Department of Health & Human Services Low-Income Home Energy Assistance Program (LIHEAP)
- U.S. Department of Energy Weatherization Assistance Program (DOE)

Additionally, California's Low-Income Weatherization Program (LIWP) is the only program of its kind in California that provides low-income households with both solar photovoltaic (PV) systems and energy efficiency upgrades at no cost to residents. The program reduces greenhouse gas emissions and household energy costs by saving energy and generating clean renewable power. LIWP currently operates three program components: Multi-Family, Community Solar, and Farmworker Housing.

The weatherization programs within CSD consists of a team approach using Program Analysts, Field Representatives, internal QCI staff, the Fiscal and Contracts Units, and the services of third-party consultants for dwelling inspections and training and technical assistance.

CSD subcontracts with a network of Subgrantees that provide DOE and LIHEAP weatherization services. The network is comprised of community action agencies or public or nonprofit 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 2020 DOE WAP grant cycle, CSD has elected to utilize a new method of grant administration in order to promote more effective allocation and expenditure of annual DOE WAP grant funds. Under this new approach, local Subgrantees interested in administering 2020 DOE WAP grant funds must complete a brief application outlining the Subgrantee's specific contract allocation request and plans for ensuring the successful expenditure of the contract allocation within the 12-month contract term. Upon conditional approval, the Subgrantee will be required to submit an expenditure and production plan for the remainder of the DOE WAP contract term. If the Subgrantee meets the expenditure and production targets, then a contract will be awarded. Upon submission of all applications CSD will allocate available funding accordingly.

Additionally, due to the limitations caused by the Covid-19 global pandemic, CSD elected to extend the 2019 grant per guidance from DOE.

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

- Correction of the problem(s) with training, technical assistance, and/or imposition of special contract conditions; or
- If Subgrantee does not fully expend its allocation by the end of the contract term, the Subgrantee's future allocations may be reduced, including capped budget items; or
- Re-assignment of the service area to an existing Subgrantee; or
- Solicitation or selection of a new or additional Subgrantee in accordance with 10 CFR Section 440.15 provisions.

V.8.2 Administrative Expenditure Limits

CSD will retain five percent (5%) of the allowable ten percent (10%) administrative funds; Subgrantees will also receive five percent (5%) for administration. Due to limited funding, 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 (5%) of their funding for administration.

V.8.3 Monitoring Activities

Monitoring Approach

CSD conducts on-site inspections and desk reviews to ensure Subgrantees meet the performance goals, administrative standards, financial management requirement, and other requirements of the DOE WAP program 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 all Subgrantees 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. Findings based upon unauthorized measure installation, billing discrepancies, client and dwelling ineligibility may result in disallowed costs.

CSD has nineteen (19) full-time staff within three Energy Division units who perform monitoring functions in various capacities: QAI, Field Operations and Weatherization Technical Support. There are also three (3) staff with 3rd party independence who perform unit inspections. All staff who perform unit inspections are QCI certified as required by DOE WAP. Nineteen percent (10%) of the Grantee T&TA allocation (or 4% 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 tool addresses but is 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, accounts payable aging); and programmatic review (prior monitoring issues, eligibility, client file review, diagnostic testing, reweatherization, 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. Field representatives will conduct client file review on a minimum of 10% of client files or 10 files whichever is greater. Noted concerns are brought to the attention of the Executive Director and/or Board Chair for resolution that may result in an onsite visit or increased reporting, such as additional comprehensive evaluations. Subgrantees determined to be at a higher risk will receive onsite visit. CSD Quality Assurance Inspectors conduct inspections on a minimum of 10% of completed units. The inspection percentages may be increased when warranted.
 - All contracts, program notices, policies, audit protocols and installation standards are available electronically through the CSD provider website. 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 homes who 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 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 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.

- Eligibility is a key component when a special investigation has been designated.

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 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 would do the follow-up investigation and address remedial action with the Subgrantee as deemed appropriate.

Energy Audits:

- CSD has established audit protocols for single family and multi-family dwellings.
- For new auditors, all electronic audit files and supporting pictures are required to be submitted to CSD for review and approval before work commence. Experienced auditors (Tier 2) are required to submit all audits for random review. Although photos are not required from Tier 2 auditors, CSD reserves the right to request photos at any time. 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.
- As part of the application process for 2020, CSD notified Subgrantees of new mandatory energy audit protocols required by DOE.

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, 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 & Safety Plan is incorporated into the contract and training is readily available to Subgrantees through CSD's provider website.
- Subgrantees are required to maintain, and have available for review, all training records and certifications. CSD technical staff maintains a list of certified firms, renovators, OSHA, contractors licensing and completion of required training. Copies of certificates are required to be submitted to CSD.
- Field monitoring guidelines include the quarterly verification of the Injury and Illness Prevention Plans (IIPP), Respirator Programs and Safety Data Sheets (SDS) binders. Additionally, business rules set up in CSD data transfer rules ensure verification.

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 and 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.
- Minimally twice a year 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 staff. A matrix of significant programmatic findings and resolution are maintained for tracking purposes and identification of trends. CSD conducts on-site monitoring of the third-party inspectors.
- CSD has developed a Quality Work Plan in accordance with WPN 15-4 Quality Work Plan Requirement. Refer to Attachment K WPN 15-4 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 to the technical support unit to arrange for training through 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.

- CSD 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 at the Subgrantee and through the web-based CSD Training Records Database.

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 Staff review the reports and contact 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 at the exit interview.

Required Follow-Up Procedures:

- Both Field Representatives and Quality Assurance Inspection teams issue reports following their visits; the Field Representatives submit reports within 30 days of their monitoring. All findings are tracked and followed through resolution. Depending upon the severity of the finding, a return visit 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 reweatherized 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, work orders, work justification, permits, HERS 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, and performance and benchmarks; this includes validating claims submitted for reimbursement, line-item reconciliation, verification of the Subgrantee's billing process, verification of internal controls, verification of procurement procedures, and an evaluation of the Provider's accounts / age payables.

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:

- 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 application of the priority list and energy audit.

Qualifications & Training:

- Field Representatives and Technical Support staff follow up with Subgrantees when required training has not been taken, training discrepancies are found or Subgrantee staff is found to be working in areas they are not qualified to perform.
- 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 & 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 RRP documentation. A finding is issued and Subgrantees are required to resolve any issue left unresolved.
- CSD inspections currently include questions related to the application of lead-safe practices, the applied use of LSW during weatherization services and renovator records.

Final Inspections:

- Third-party and 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. Inspections are conducted at a rate of a minimum of 10% 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.
- Any identified 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 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:

- Detail the action(s) that will be taken to resolve the finding(s);
- Describe 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 aspects and once confirmed, the monitoring report is closed. Follow-up is then conducted during the next monitoring cycle to determine if they are indeed following their CAP and if the issue can be considered fully resolved.

Financial MonitoringFinancial 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 A-133 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:

- Field Representatives review payroll records, timesheets, and organizational charts during annual monitoring. 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 maintain in CSD's central repository. CSD Field Representatives confirm Subgrantees' retention policies are following these requirements.

Required Follow-Up Procedures:

- Both Field Representatives and Quality Assurance inspection team issue reports following their visits. All findings are tracked and followed through resolution. Depending upon the severity of the finding, a return visit to verify resolution may be necessary.
- CSD's Audit Unit issues an Audit Transmittal Report after a desk review of audit reports submitted by Subgrantees. Reports are issued as a result 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 required all Subgrantees to convert to fully automated data systems at the local level since the current reporting software originally provided by CSD has been abandoned. Subgrantees have the discretion of choosing the electronic solution that best fits their needs and meets the state's reporting requirements.
- Subgrantees are currently required to transfer electronic client file data to CSD in a central depository monthly. It is currently 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 paper work 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, usually through an exit conference. Within 30 days after each visit, the State will prepare a draft written report on its findings and/or recommendations; and send it to the Subgrantee for feedback. CSD addresses any findings, observation, and/or recommendations a Subgrantee may contest and/or need clarification on, including incorporating said feedback. After CSD finalizes the written report it is provided to the Subgrantee. If corrective action is applicable Subgrantees must submit a corrective action plan

Monitoring Schedule

The monitoring season for Field Representatives typically runs from March through the end of October. All Subgrantees will be monitored annually through on-site visits or comprehensive desk reviews. Subgrantees with programmatic concerns or at high-risk may receive a comprehensive desk review and an onsite visit. Frequency of inspection visits by CSD and third-party inspectors are dependent upon each Subgrantee's level of production. CSD has projected that at a minimum, a range of 10% of dwellings will be inspected for the upcoming program year for each Subgrantee. All Subgrantees will be visited at least once by Quality Assurance Inspectors but several will need multiple visits to meet quotas for all energy programs. The same inspection criteria (excluding QCI certification) are applicable to the LIHEAP weatherization.

Recordkeeping

All records maintained by Subgrantees must meet the OMB Super Circular requirements contained in 2 CFR Chapter 1, and Chapter II, Parts 200, 215, 220, 225, and 230, "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 are required to 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.

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 general geographical area. For designated high-risk Subgrantees, an independent financial audit may be performed.

Termination Procedures

CSD may commence suspension or terminations proceedings based on non-performance or material breach of Subgrantee contract. CSD may impose sanctions as provided in 2 CFR 200.338 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. sections Code of Federal Regulations sections 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 and/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 will conduct desk reviews and report evaluations on an ongoing basis in accordance with Section V.7.3 Monitoring Activities. Problems that qualify to be resolved through training and technical assistance will be addressed by the Field Representatives and/or other CSD staff, outside consultants, and occasionally by staff brought in from other Subgrantees.

Training and Technical Assistance - Grantee

As part of the field inspection process, the inspection contractor provides monthly reports summarizing the results of their inspection visits and identifying any training needs. Field Representatives provide both training and programmatic assistance during onsite visits and through ongoing telephone contact with the Subgrantees. Program Analysts comprising CSD Technical Support Unit provide the following:

- Technical assistance to staff and Subgrantees, develop training curriculum, and assess past and future training needs.
- Evaluate energy audit reports, and if deficiencies are found, either provide mentoring or refer the Subgrantee to CSD's technical consultant for necessary training.

- Maintain a “Hotline” available to Subgrantees seeking immediate technical assistance. Mentoring for underperforming or new Subgrantees is also provided by the technical consultant at CSD’s direction or CSD technical support staff.
- When Subgrantee staff turnover is identified, CSD staff ensures that all new employees receive the required training through online and CSD-approved training center courses. Subgrantees are required to maintain for review a log of weatherization employees and the dates and locations for all required training received.

In addition to CSD staff, a third-party technical consultant provides follow-up field training and technical assistance pertaining to: weatherization measures, audits, diagnostics and related standards.

Training Requirements for Grantee:

- In accordance with the Department of Energy requirements, CSD has met the quality control inspector certification requirements. Using the NREL job-task analyses for single and multi-family jobs, the department has modified its existing training curriculum for quality control inspectors to incorporate required additional components.
- Appropriate CSD staff will receive updated training as needed (i.e., annual standards update). All CSD field representatives are required to become Certified Renovators, by completing the EPA’s Lead Renovation, Repair and Painting (RRP) course.
- CSD staff will attend the Energy OutWest Peer Exchange, DOE and NASCSP meetings and conferences as approved by the Governor’s office.
- CSD staff are trained on an on-going basis to keep abreast of contractual and policy changes.

All new CSD quality assurance, field and technical staff are required to complete the following courses:

- Basic Weatherization
- Combustion Appliance Safety
- Duct & Shell Leakage Training
- EPA RRP Certification

Due to the annual development of monitoring tools and processes, ongoing training will be required for CSD staff to become proficient with the updated monitoring protocols.

Training and Technical Assistance – Subgrantee

The training and technical assistance funds will be allocated to Subgrantees to provide the required training. The department allocates up to 5% of LIHEAP weatherization funds and up to 2% of ECIP funds for training purposes to supplement DOE’s contribution. The training requirements apply to field employees of Subgrantees and subcontractors who provide basic weatherization services. The curriculum associated with the series below is being updated to meet new DOE training requirements and align with JTA standards and CSD’s standards (WIS) and Field Guide. Additionally, CSD is currently in the process of updating the WIS and Field Guide and also combining them into one cohesive document entitled Technical Reference Manual (TRM). Publishing of the TRM will take place on June 30, 2020. Trainings will be provided for Subgrantees on using the TRM, with an expected adoption date of January 1, 2021. CSD initially

scheduled October 1, 2020 as the effective date. Due to the COVID-19 pandemic, however, CSD extended the effective date to allow agencies more time to prepare. Additionally, virtual training is being developed in lieu of the planned regional trainings.

Subgrantees and subcontractors who perform basic weatherization services are encouraged to schedule additional refresher trainings as needed with CSD's training contractor. Subgrantees may be required to repeat coursework or take specialized training if deemed necessary when issues are identified through field monitoring or quality assurance inspections.

CSD's training program consists of a full series of weatherization courses constituting a comprehensive approach for training installers through field supervisors. When all workers are first hired, they are required to take Basic Weatherization comprehensive training within 180 days of employment. Dependent upon their job role and duties, they are required to successfully complete additional courses in diagnostics, assessments and inspections before they can conduct tests or perform in the capacity of an assessor/auditor or inspector. Refresher courses in all areas of weatherization are offered on demand or when CSD identifies a need through monitoring and inspection processes.

Training Requirements for Subgrantee Weatherization Workers

Three core training courses are held at a CSD approved training facility and consist of both theory and hands-on curricula. Specialty subcontractors are only required to take training for diagnostic testing if they are to conduct the testing in the course of their work. New Subgrantee weatherization workers are required to attend these three courses, as their respective job titles and duties dictate. CSD does not require Subgrantee staff to be certified prior to hiring. No weatherization staff may function unsupervised until training and certification requirements are met as specified by contract. The three courses are as follows:

1. Basic Weatherization (within 180 days of hire)
2. Combustion Appliance Safety (before testing can be performed)
3. Duct & Shell Leakage (before testing can be performed)

Other Training and Credentials include:

- Online Health & Safety training (within 30 days of hire)
- EPA RRP Certification
- REM/Design Audit Training
- OSHA 10 and 30 (within 30 days of hire)
- CSD Auditor training (Auditors and Field Supervisors only)
- CSD Inspector training (Inspectors and Field Supervisors only)
- BPI Certified QCI Inspector Certification (Qualified Inspectors only)

Maintaining Workforce Credentials

Workforce credentials are tracked through both pro-active and passive means of maintaining training records through direct inquiry, and information periodically provided from Subgrantees, CSD approved training centers, and CSD's third-party technical consultant.

Subgrantee Training Evaluation

Evaluation of the training provided to Subgrantees includes:

- Various reviews conducted by Field Representatives assess the need for training. The Technical Support Unit evaluates energy audit reports and if deficiencies are found, either provide mentoring via telephone or refer the training to CSD's technical consultant for follow-up.
- As part of the field inspection process, the inspection contractor provides monthly reports summarizing the results of their inspection visits and identifies any training needs. A web-based training records database will maintain all records for required and supplemental training. Compliance reports will be a key component of the system after further development.
- CSD's technical consultant will be evaluating TREAT audit reports and provide technical assistance as needed.

Training Development

Training development is comprised of the following:

- The training curriculum for training center coursework will be updated to align 100% with JTA standards and to incorporate revisions from the CSD standards manuals. Refer to Attachment K WPN 15-4 Quality Work Plan Requirements.
- CSD is currently in the process of updating the WIS and Field Guide and also combining them into one cohesive document entitled Technical Reference Manual (TRM). Publishing of the TRM will take place on June 30, 2020. Trainings will be provided for Subgrantees on using the TRM, with an expected adoption date of January 1, 2021.
- The development of the TRM caused a delay in the accreditation process. However, CSD's technical consultant has developed curricula for Energy Auditor and Quality Control Inspector certification training. The courses are comprehensive and in alignment with the JTAs. Given that DOE will not be requiring CL and RIT certifications (WAP Memorandum 050), CSD will abandon the comprehensive curricula specific to these two job roles. The new coursework will constitute a comprehensive package and be based upon the new standards currently under development. Curriculum updates will be made to the online, training center, field and refresher training courses. Formalized on-the-job training will be developed along with trainee assessment tools.
- Field operations unit develops and provides semi-annual webinars to key administrative and fiscal Subgrantee staff on various subject matters, including, but not limited to, contractual changes and monitoring protocol.
- Technical support unit develops and conducts a webinar series entitled "Technically Speaking..." to disseminate information related to changes in field protocols and policies and any identified field or technical issues. These webinars are conducted as needed.
- REM/Design Energy Auditor training is a required course for Subgrantee staff that will perform audits. CSD is increasing its training offerings for the REM/Design Auditor Training to assist agencies in meeting new 2020 DOE WAP Requirements. This increase in training offerings will also include online module components.
- At CSD's discretion, current agency auditors may be required to take a refresher course if they have not recently submitted an adequate number of audits to demonstrate

proficiency or if submitted audits do not demonstrate sufficient understanding of required modeling practices. This policy may also apply to Tier 2 auditors.

- CSD is in the process of procuring an updated and more thorough online learning management system (LMS). CSD will deploy the LMS for online training, automation of registration for online and in-person courses, and to track the training records of individual weatherization workers.

Health and Safety

Health and Safety is included in many aspects of the weatherization program. It addresses what measures are categorized as health and safety, dictates client education and crew training requirements, and drives many programmatic policies. This training covers all of these areas from California's state plan and will aid staff in applying these policies correctly.

To be program-compliant, Program Managers, Field Supervisors, and all Field Staff from each Subgrantee and basic weatherization subcontractor are required to participate in the online and OSHA training. The online health and safety training consist of:

- Workplace Safety
- Lead-Safe Weatherization
- Environmental Hazards
- Health & Safety Plan Comprehensive Training

Client Education

Subgrantees are required to provide client education and budget counseling that encourage households to reduce their home energy needs and the need for energy assistance. Each Subgrantee has the latitude to develop their own client education program however, at a minimum, they must provide the following:

- Written information that describes energy saving behavioral adjustments that will decrease the energy consumption of the household;
- Resource information, referral, family, and budget counseling to assist clients in achieving self-sufficiency;
- The EPA pamphlet entitled "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and School";
- The EPA pamphlet entitled "A Brief Guide to Mold, Moisture, and your Home";
- The EPA pamphlet entitled "A Citizen's Guide to Radon";
- The EPA factsheet entitled "Protect Your Family from Asbestos-Contaminated Vermiculite Insulation."
- Description of benefits that can be expected of the weatherization measures to be installed and how to maximize the effect of each measure.

V.9 Energy Crisis and Disaster Response Plan

The purpose of California's Department of Energy (DOE) disaster planning and relief 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 has a very limited role in any disaster response. 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 re-weatherization) 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, 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, records and the like during the initial phase of the disaster response.
- The cost to use weatherization vehicles and/or equipment to help assist in the disaster relief provided DOE is reimbursed per 2 CFR 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 of \$7,669 per dwelling unit.
- 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 disaster include:

- Disaster relief services are only available to qualified low-income households directly affected by the declared disaster. DOE requires that 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.
- It is permissible, however, to consider households located in the disaster area as a priority if the households are eligible and 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.