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**V. Master File**

**V.1 Eligibility**

**General Description**

Owners and renters with income levels up to 60% of the State Median Income may receive services. Priority is given to households with children under 6, elderly or disabled members, and households with a high energy burden.

**V.1.1 Approach to Determining Client Eligibility:**

Wisconsin adopted for its Weatherization Assistance Program (WAP) eligibility the same guidelines used statewide in the Low-Income Home Energy Assistance Program (LIHEAP). A household is eligible for weatherization services when the Wisconsin Department of Administration, Division of Energy, Housing and Community Resources (DEHCR or 'Division') has certified the household to be eligible for LIHEAP, based on the following criteria from 10 CFR Part 440.22:

(a) A dwelling unit shall be eligible for weatherization assistance under this part if it is occupied by a family unit:

(1) With an income at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

(2) Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance; or

(3) If the State elects, is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

**Income Verification**

Wisconsin has a combined LIHEAP and WAP application intake process that provides all the applications for weatherization subgrantees. The Wisconsin Home Energy Assistance Program (WHEAP) income limit equaling 60% of State Median Income (SMI) is used to provide consistency of service and allow shared systems and programming for data collection, entry, and reporting. If a household is over 60% State Median Income (SMI) and ineligible for Energy Assistance but below 200% Federal Poverty Level (FPL), then they are eligible for Weatherization Services and referred to subgrantee. Since 60% SMI is very close to 200% FPL in WI, this applies to a very small number of households.

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The Division has established written policies, incorporated in the Weatherization Program Manual, which set forth procedures to determine dwelling unit priority [440.16]. Written policies cover income eligibility, determination of rental property eligibility, and assurance of tenant benefit from weatherization services. An energy audit must be completed within 12 months from the certification date or the eligibility of the household needs to be re-established by re-applying for WHEAP. Wisconsin complies with all household and building eligibility criteria outlined in 10 CFR 440.22.

#### **Qualified Aliens Eligibility for Benefits**

Non-citizen applicants to the LIHEAP program in Wisconsin are determined to be either eligible non-citizens or ineligible non-citizens. Eligibility for non-citizens is determined based on an individual's lawful status in the United States as defined by the United States Citizenship and Immigration Services (USCIS). Only Eligible Non-citizens are eligible for LIHEAP and the Wisconsin Weatherization Assistance Program.

In order to be defined an Eligible Non-citizen, an individual must have a valid Social Security Number (SSN) issued by the Social Security Administration, which passes the verification system in the Home Energy Plus (HE+) System. The HE+ System verifies the SSN of all household members through the Social Security Administration using the Master Customer Index database administered by the State of Wisconsin Department of Health Services. In addition to a valid SSN, the individual's lawful status must be one of the eligible statuses listed in the WHEAP Operations Manual, Section 2.2.4 - Student Status and WHEAP Eligibility. Applicants are required to provide non-expired documentation which validates their lawful status in the United States.

Individuals who do not have a valid SSN and/or immigration status are marked as Ineligible Non-citizens and are not eligible for either program.

#### **V.1.2 Approach to Determining Building Eligibility**

The Division has established written policies, incorporated in the Weatherization Program Manual, which set forth procedures such as verifying ownership, denying or deferring services, and using Weatherization Assistant, to determine building eligibility.

The combined LIHEAP and WAP application intake process provides all the applications for weatherization subgrantees, applying the client eligibility guidelines as described in Section V.1.1.

#### **Reweathering**

Wisconsin permits the re-weatherization of units completed through September 30, 1994. Units previously weatherized may receive any additional measures as determined by an assessment utilizing DOE approved energy audit protocol. By following this procedure, Wisconsin is identifying units that did not receive the full complement of weatherization services previously. Otherwise, a unit may only be reweatherized if such

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dwelling unit has been damaged by fire, flood, or an act of God and repair of the damage to weatherization materials is not paid for by insurance, per 440(18)(2)(ii).

#### Eligible Structures

To be considered for weatherization, a dwelling must be a structure, including a stationary mobile home, apartment, group of rooms, or a single room occupied as separate living quarters (including historic properties), and qualified shelters or other group facilities. Government institutions, halfway houses, nursing homes, recreational vehicles (RVs), cars, trucks or tents are not eligible dwellings for weatherization services. Properties having only a commercial use are not eligible for weatherization. Properties fifty years old or older must be reviewed for possible historic status or features and shall be weatherized only in such a way as complies with the State Historic Preservation Officer (SHPO) Programmatic Agreement. Weatherization of a dwelling unit which is designated for acquisition or clearance by a Federal, State, or local program within 12 months from the completion date of weatherization is not allowed.

#### Rental Units

Wisconsin has an extensive policy regarding the weatherization of rental property, including procedures to document that the tenant receives the benefits of weatherization [440.22(b)]. Owners of rental buildings containing two or more units may be required to contribute to the cost of weatherization [440.22(d)].

Language from the Wisconsin Weatherization Program Manual addresses the DOE requirements regarding limits on rent increases and undue enhancement. Renters are notified of the stipulations on rent increases. Compliance is monitored at on-site administrative review visits to subgrantees. Rental property owners must provide signature approval of work to be performed on a standardized Rental Work Agreement prior to commencement of work. Renters are provided a copy of the work agreement. The Division has established an arbitration procedure for disputes relating to violations of rental agreements. Tenants and property owners are notified of this process at the time of weatherization. As part of the rental agreement, landlords must agree to repayment of weatherization service for violation of the agreement [440.22(c)].

When DOE funds are used to weatherize multi-unit buildings, Wisconsin requires that 66 percent or more (50 percent for 2 and 4 unit buildings) of the dwelling units in the building are occupied by eligible applicants. Multi-family buildings that have 25 or more units are considered on a case-by-case basis and completion is managed by the local subgrantee with extensive oversight by the Division to ensure work completed meets all applicable federal requirements.

#### Deferral

Wisconsin has a detailed policy and clear procedures for subgrantees to follow when deferral is necessary. Subgrantees are required to provide written notification of deferral within five working days upon decision to defer services and provide a reasonable timeframe for applicants to address the cause of the deferral. Reasons for deferral include structural or other issues that would limit the effectiveness or reduce the lifetime of measures (such as in a home needing roof replacement). There are also health and safety reasons

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that may warrant deferral of a unit. Additional information on deferrals is found in the Health and Safety Plan (Attachment 9).

**V.1.3 Definition of children:** Below age 6.

**V.1.4 Approach to Tribal Organizations**

**Recommend tribal organization(s) be treated as local applicant? Yes.**

**If YES, Recommendation: If NO, statement that assistance to low-income tribe members and other low-income persons is equal:**

The Division provides weatherization services to eligible Native American households both on and off reservations [440.16(f)]. Where a Tribal household is in alignment with the DOE priority definition, The Tribal referrals shall be given priority for service by weatherization subgrantees. Off-reservation households of Native Americans will be served by local agencies in that service area according to the same prioritization as non-Native households.

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

Weatherization services are provided on a statewide basis. Funding allocations among the subgrantees [440.15(b)] are made according to a population-weighted degree-day formula, shown below, which complies with the requirement to allocate based on relative need. The formula is used to determine overall agency funding except for Training and Technical Assistance (T&TA). Any additional DOE funds received during the year will be allocated to local agencies according to the same formula.

The allocation formula is:

$$\text{CDD} \times \text{CPH} \times 100 = \text{County allocation} \\ \text{SCDDH percentage}$$

where:

CDD is the average county degree-days

CPH is the county persons eligible for Low Income Home Energy Assistance (LIHEAP)

SCDDH is the sum of the county degree days multiplied by LIHEAP eligible households

**V.3 Priorities for Service Delivery**

The State of Wisconsin requires subgrantees to prioritize weatherization services to the elderly, disabled persons, households with children under six years old and households with a high energy burden [440.16(b)]. Eligible households are assigned a priority identification number and added to a referral list maintained by the Division. The priority identification number is generated based on factors including the household energy burden, and whether the household includes members that are elderly, disabled, or under six years old. The

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referral list is updated weekly and available to subgrantees electronically. Subgrantees select referrals from the list based on priority identification number and actual energy use data (when available).

#### V.4 Type of Weatherization Work to Be Done

##### V.4.1 Technical Guides and Materials

Subgrantees shall, in a satisfactory manner, perform program activities according to the "Weatherization Assistance for Low Income Persons Program" regulations pursuant to Part A, U.S.C. 6861-6872 of Title IV of the Energy Conservation and Production Act, Pub. L94-385, 90 Stat. Et. Seq: Title 10, Chapter 2, Part 440 (published in the Federal Register), Friday, December 8, 2000, Vol. 65 No. 237.

Wisconsin uses the Wisconsin Weatherization Program Manual and the Wisconsin Weatherization Field Guide to pass along to its subgrantees policies and procedures to be followed. These and more guidance documents are located on the Division's Home Energy Plus website at <http://homeenergyplus.wi.gov/category.asp?linkcatid=494&linkid=122&locid=25>. The Division also issues periodic policy updates and other guidance through emails to subgrantees.

A balanced combination of energy conservation techniques will be utilized in compliance with DOE regulations [440.14(c)(3)]. Since July 1, 2012 major measures are selected by a computerized energy audit which has been approved by DOE. Typical work includes instrumented air sealing, attic and sidewall insulation, refrigerator replacement, electric water heater conversion, furnace replacements when necessary, and lighting replacement with Energy Star® qualified light bulbs (CFLs and LEDs). Wisconsin has approval to use LED lamps as an approved weatherization material via the WPN 16-8 Energy Audit tool submittal. Allowable expenditures are established to meet the requirements of 10 CFR Part 440.18. All work is performed according to DOE approved energy audit procedures and the Standard Work Specifications. All materials and specifications are met per the standards set forth in 10 CFR 440, Appendix A.

#### WPN 15-4, Section 1: Definition of Work Quality Guidelines and Standards

All measures and incidental repairs performed on client homes must meet the specifications provided in the Weatherization Program Manual and Weatherization Field Guide. The current versions of these guidance documents are available on the Home Energy Plus website: <http://homeenergyplus.wi.gov/category.asp?linkcatid=494&linkid=122&locid=25>.

During PY 201418 Wisconsin reviewed and revised the Weatherization Field Guide to ensure all standards meet or exceed the minimum standards in the relevant SWS requirements as required by WPN 15-4 Section 1. The Field Guide was finalized in August 201518, to comply with the appropriate SWS for each procedure and was approved by our DOE Project Officer. Wisconsin Request for Bid templates include a requirement that subgrantees ensure contractor agreements are tied to program requirements contained in technical guides and materials.

#### WPN 15-4 Section 2: Communication of Guidelines and Standards

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All subgrantee agreements and contracts contain language which requires that work performed meets the technical specifications for field work provided in the Weatherization Program Manual and Weatherization Field Guide. The Grantee contract requires subgrantees install allowable weatherization measures per the Wisconsin Weatherization Program Manual, and federal and state regulations (Article 5. Scope of Work). All work is being performed in accordance with DOE-approved audit procedures (see V.5.2 below) and 10 CFR 440 Appendix A.

In April 2018 Wisconsin updated the Weatherization Program Manual to clarify that subgrantees are required to identify and provide the applicable technical standards and specifications in every procurement action. In addition, in April 2018 Wisconsin updated the Request for Bid templates used by subgrantees to ensure that contract agreements are tied to our program requirements and the related Standard Work Specifications (SWS) incorporated into our program documents. These updates are communicated each year to all subgrantees via e-mail and at our Annual Grantee Meeting in May 2019. Attendance at the Annual Meeting is mandatory for all subgrantees. Wisconsin will continue the process of cross-walking the Standard Work Specification updates that will be issued in the Fall of 2019 with program documents to prepare for implementation of any necessary changes in Program Year 2019/20. The Weatherization Operators of Wisconsin, its subcommittee the Hudson Group, and the Division's Technical Development Work Group have provided input to proposed policy changes.

Updates are made to the Weatherization Program Manual and Weatherization Field Guide annually and the documents are distributed electronically to all subgrantees via broadcast e-mail and published on the Home Energy Plus website on or before July 1. A signature on the weatherization contract will serve as proof of receipt.

The Division provides follow-up and clarification upon request through our Help Desk (via e-mail and telephone), through broadcast e-mails sent to all subgrantees, and at quarterly Weatherization Operators of Wisconsin organization meetings.

**V.4.2 Energy Audit Procedures**

**Single-Family:**

Audit Procedures and Dates Most Recently Approved by DOE: June 12, 2018

Audit Procedure: Single-Family

Audit Name: NEAT

Per WPN 16-8 Wisconsin submitted its Audit Procedures to DOE for review in January 2018. Energy audit procedures and related protocols and standards were approved by DOE on 06/12/2018. Per WPN 19-4, Wisconsin has submitted a request to our DOE Project Officer to extend energy conservation measure lifetimes to the updated allowable default of 30 years for building insulation measures.

**Manufactured Housing**

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Leveraged funds are used to weatherize manufactured housing. Wisconsin does not plan to seek DOE approval of our audit protocol for this housing type. Wisconsin requires the use of MHEA for mobile homes heated with bulk fuels or electricity.

#### **Multi-Family**

Leveraged funds are used to weatherize multi-family buildings. Wisconsin does not plan to seek DOE approval of our audit protocol for this housing type.

#### **One to Twenty-Four Unit Buildings**

Wisconsin models all 1 to 24-unit buildings with NEAT. Each energy conservation measure must have a SIR of at least 1.00 and the total job SIR must also be at least 1.0. The Division has developed uniform, validated NEAT databases (including enabled measures and set-up libraries) for 1 to 4-unit buildings and 5 to 24-unit buildings. Agencies are required to use these data and an approved audit protocol to evaluate units and assure that program outcomes conform to DOE requirements. Agencies are required to follow the policies and procedures in the Wisconsin Weatherization Program Manual and [Wisconsin Weatherization Assistant Guide](#), which includes detail on the measures that shall and shall not be included in the SIR calculation (see Weatherization Assistant Guide Chapter 4).

#### **Manufactured Housing**

Wisconsin uses MHEA (Version 8.9) to model manufactured homes if a bulk fuel or electricity is the primary space heating fuel. A SIR of at least 1.0 is required for all energy conservation measures. A cumulative (unit or building) SIR of 1.0 is required for all buildings released for production. In July 2015 Wisconsin discontinued the use of MHEA for auditing natural gas manufactured homes and began using a measures list program model. The measures list was developed based on extensive analysis of actual energy savings data from Wisconsin's Self Evaluation Savings studies, and a comparison of MHEA estimated costs to actual reported costs for the most recent program year. Only leveraged funds are used to weatherize manufactured homes.

#### **V.4.3 Final Inspection**

A final inspection is performed by subgrantee staff on every unit prior to reporting the unit as completed [440.16(g)]. Generally, the final inspection will not be performed by the person who did the initial energy audit of a property. In all cases the final inspection is performed by someone other than staff who performed the weatherization work. The Division recommends subgrantees to perform "real-time" final inspections when possible, a process improvement initiative to have the final inspector on-site on the last day of scheduled crew work. This improves responsiveness and efficiency of program operations by allowing crew workers to immediately address unsatisfactory work.

#### **WPN 15-4 Section 3: Inspection and Monitoring of Work Using Guidelines and Standards**

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All subgrantee final inspections for completions reported in PY 2016 and beyond will be performed by certified Quality Control Inspectors as outlined in WPN 15-4 Section 3. Wisconsin is implementing a Grantee-Developed Quality Control Inspection Policy to ensure compliance with WPN 15-4. The Division's goal is to have a sufficient number of certified QCI professionals in the subgrantee network so that the certified QCI performing the final inspection did not perform the initial energy audit. Where applicable two options will be available for final inspection procedures:

- Final inspections are performed by a certified QCI professional who did not perform the initial energy audit and was not a crew member who completed the weatherization work. Quality assurance reviews will be performed on at least 5 percent of completed units.
- Final inspections are performed by a certified QCI who also performed the initial energy audit but was not a crew member who completed the weatherization work. Quality assurance reviews will be performed on at least 10 percent of completed units.

As of December 31, 2018, Wisconsin has 68 QCI certified staff in the Weatherization Assistance Program network: 54 subgrantee staff, 5 Division Staff and 5 employees of subcontractors that complete monitoring visits (see Section V.7.3 Monitoring Activities). The Division's goal is to have at least two certified QCI on staff at each subgrantee, where reasonable, and the Division is working with subgrantees to increase the number of QCI certified staff. QCI trainings and exams are being proctored by Slipstream (see Section V.7.4 Training and Technical Assistance Approach and Activities), an IREC accredited training provider. The Division will be monitoring certification through the BPI website and certification dates provided by subgrantee staff to validate QCI credentials.

Inadequate inspection practices will be identified by Division Quality Assurance staff during monitoring visits (see Section V.7.3 Monitoring Activities). Disciplinary actions for inadequate inspection practices will be reviewed on a case-by-case basis. When disciplinary action is warranted, a corrective action plan will be developed and implemented based upon the significance of the finding.

#### **V.5 Weatherization Analysis of Effectiveness**

Quality assurance is the ongoing process of verifying that completed program work meets clear, measurable expected outcomes as established by program standards. Every weatherized unit receives a comprehensive inspection before the owner signs off on the completed work. The Division continually gathers and analyzes data on housing types, frequency of measures installed, costs of installed measures and the direct effect of the installed measures. Much of the data is provided directly by subgrantees in the individual job reports completed in the Wisconsin WAP online reporting database, WisWAP. At least five percent, and up to 10 percent, of completed units are inspected and tested in monitoring inspections completed by Division staff and contractors. Using this data, Division Quality Assurance staff select units for monitoring to ensure the on-site monitoring visits provide the best opportunities to review measures that may need improvement at a local level and to review jobs that may have higher measure costs. During the on-site visits, customers are interviewed to verify customers' understanding of completed work and assess their level of satisfaction with the work performed. The data accumulated from these evaluations are used to continually improve training curriculums and to adjust audit protocols, work standards, and procurement specifications.



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The Division contracts with Slipstream (Effective 1/1/2019 Wisconsin Energy Conservation Corporation merged with Seventhwave to become Slipstream) for independent and objective evaluation of program processes and outcomes. The Self Evaluation Savings (SES) study, conducted at least biennially provides critical data on the projected energy and monetary savings of weatherization work performed. Utility bill information from approximately 10,000 households is analyzed in comparison with WisWAP data regarding measures installed in thousands of weatherized units. Utility information for income-qualified households not yet weatherized is utilized to control for weather and other non-program effects. Through this study, the Division can analyze trends in savings over multiple years and compare energy savings and measure costs among the subgrantees. The SES assists in assessing program effectiveness, directing policy decisions, identifying best practices being used at some agencies and targeting training and technical assistance resources.

The Division also contracts with Slipstream for detailed analysis of audit practices and agency effectiveness. The Audit QA analysis completed once per year aggregates data from every Weatherization Assistant audit performed and evaluates a wide variety of data markers to assess auditor skills and accuracy. Data from these analyses informs our effort to create and update a comprehensive Weatherization Assistant User's Manual. The Audit Comparison Study, also completed once per year, melds cost information from the Self Evaluation Savings study and the Audit QA analysis. The report assesses program measure cost trends, auditor accuracy in estimating costs, and the degree to which energy audits accurately forecast results. The data from these evaluations informs the Division's policy-making, training development and monitoring and support provided to subgrantees, allowing limited technical resources to be deployed for maximum effectiveness.

Communication is an essential part of the process. The Division participates with subgrantees in a variety of venues including the state association for Community Action Agencies (WISCAP), Weatherization Operators of Wisconsin (WOW), and the Hudson group (a WOW sub-committee comprised mainly of energy auditors and production managers from subgrantee weatherization programs). These groups encourage open discussion regarding ways to improve low-income weatherization services and provide a setting to inform grantees of program modifications. The Division supports the formation of focus groups to support the development of energy related technology such as the Technical Development Work Group (TDWG). These groups provide technical support and data to evaluate proposals and assess measure implementation.

The Division sponsors an annual Grantee Meeting for specific needs to ensure all subgrantees receive information regarding contract and policy updates. Subgrantee attendance at state sponsored Grantee Meeting is required. The Division also attends the WOW quarterly meetings to provide updates and engage with the network on potential policy changes, training updates, quality assurance activities, and funding levels.

**V.6** Wisconsin's Health and Safety Plan is included in PAGE as Attachment 9.

#### **V.7 Program Management**

##### **V.7.1 Overview and Organization**

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The Division contracts with Community Action Agencies and a variety of public and non-profit entities to deliver weatherization services. Some of these subgrantees also administer housing programs such as CDBG and HOME funded programs (including rehab and first-time homebuyer). This results in a comprehensive set of services being offered to the state's low-income customers. In addition to the Low-Income Weatherization Assistance Program, the Division also houses the Low-Income Home Energy Assistance Program and an Emergency Furnace Program. Together, these low-income assistance programs comprise the Home Energy Plus programs. The Division also maintains close working relationships with the state's utilities to ensure coordination of services between programs offered by utilities and the state's Weatherization Assistance Program.

The Division retains staff to conduct on-site monitoring of contracts, perform field inspections of projects, and provide technical assistance and oversight to subgrantees. The Low-Income Energy Advisory Committee (LIEAC) is established to meet the requirements of 440.17. As required by 440.17(a) (1,2,3), membership is selected for special qualifications and sensitivity to the problems of low-income persons, including their weatherization and energy conservation needs. Membership is also broadly representative of organizations and agencies, including consumer groups that represent low-income persons in their area – particularly the elderly, disabled, and Native Americans. The committee has responsibility for advising the Division on the development and implementation of its Weatherization Assistance Program.

#### **V.7.2 Administrative Expenditure Limits**

Administrative expenditures are limited to 10% of the total DOE Grant allocation and is split 5% to State Administration and 5% to subgrantee administration.

#### **V.7.3 Monitoring Activities**

Monitoring is completed to assure that subgrantees are operating the program according to DOE rules and regulations and policies established by the Division, and to determine local training needs. The monitoring activities described in this plan apply to DOE funded activities.

The Division's Quality Assurance (QA) Section staff conducts monitoring of subgrantees. The in-house QA Section includes one fiscal review monitor, two administrative review monitors, four technical assistance monitors, one support staff and the section chief. All technical assistance monitors received the following trainings and related certifications;

- Lead Safe Weatherization
- Lead Renovator
- Asbestos Operations and Maintenance
- Weatherization Assistant training
- Quality Control Inspector

Quality Control Inspectors (QCI) working for, or contracted by, DEHCR possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for Quality Control

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Inspectors. QA staff also provide onsite technical assistance. Supplemental technical assistance includes topics such as working safely on homes with lead or asbestos, forced air heating systems, boilers, procurement, process improvement, air sealing, mobile home weatherization, ventilation, and OSHA construction safety trainings. The QA section includes individuals with extensive experience managing subgrantee weatherization programs, and with building science, construction engineering or architectural backgrounds.

In addition to QA Section staff, one or more technical inspection subcontractors are used as needed to complete on-site reviews. The Division entered into two contract agreements for technical inspection services, with Slipstream (Effective 1/1/2019 Wisconsin Energy Conservation Corporation merged with Seventhwave to become Slipstream) and Energy House, Inc., Slipstream has four certified QCI on staff and Energy House has two certified QCI on staff performing technical inspections for the Division. The Division verifies subcontractor QCI certifications annually.

The subcontractors, under the direction of QA Section staff, evaluate units to determine if they were appropriately weatherized and if the quality of the workmanship meets the standards established by DOE and the Division. Although the subcontractors may conduct on-site evaluations of units weatherized, subgrantee oversight will continue to be primarily the responsibility of the Division and part of the QA Section's duties. The Weatherization QA Section staff will conduct follow-up inspections where required. Subgrantees are not allowed to use additional DOE funds on reported jobs that require reworks or warranty work.

Training and Technical Assistance (T&TA) funds pay for 5.65 QA Full Time Equivalent (FTE) positions. The Division uses Leveraging and Administrative Funds to pay for 2.35 QA FTE positions. The remaining division QA FTE position is paid with non-DOE funds from other sources.

The estimated travel costs for monitoring efforts for July 1, 2019 – June 30, 2020 is approximately \$39,590. Estimated travel costs for monitoring efforts will be funded by T&TA and Leveraging funds. The remaining portion of expenses will be paid out of non-DOE funds.

The Division is responsible for monitoring and oversight of work performed by subgrantees and will visit each subgrantee at least annually. More frequent QA reviews will be performed if quality issues are discovered during initial visits. A minimum five percent sample of DOE funded units will be inspected. As noted in Section V.4.3, a minimum of 10 percent of each subgrantee's DOE funded units will be inspected if the final inspection and the initial audit are completed by the same subgrantee staff person.

Both administrative review staff and technical assistance monitors complete extensive file reviews on inspected units, and on an added sample of other units. If significant deficiencies are discovered concerning health and safety violations, poor quality of material installation, or major services missed, the Division will increase either the number of units monitored or increase monitoring of subgrantee contract management practices as applicable until the deficiencies are remedied. Agencies that have significant deficiencies will be referred to receive Production Based Training or be required to attend training activities provided through the Standard Training Plan or other specialized technical assistance to improve performance (see Section

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V.7.4). Required subgrantee staff qualifications and training are tracked by our T&TA subcontractor and compliance is verified during Administrative Reviews by Division staff.

Comprehensive monitoring of subgrantees is conducted as a three-part set of activities fulfill the requirements of WPN 16-4. The combination of these monitoring activities in conjunction with periodic report assessments provides an in-depth look at all program components. Monitoring checklists and tools used by both Administrative Review (AR) and field monitoring staff are attached. The QA Section completes all three sets of activities for each subgrantee, which are:

1. Administrative reviews
2. Dwelling inspections
3. Client file reviews

**Activity 1:**

The administrative review covers the general operations of the subgrantee with a comprehensive examination of programmatic, financial, and management practices and outcomes. The administrative review combined with the agency's own fiscal audit give the Division an overview of the subgrantee's administrative capacity and capability. This includes a review of subgrantee financial management, accounting systems and operations, invoicing, purchasing and procurement procedures, inventory tracking, payroll and personnel, subcontractor management and quality assurance monitoring methods, vehicle and equipment lists, health and safety policies, record retention, quality assurance procedures and additional aspects of local program administration and organization. Checks are made that financial procedure manuals exist and are followed. Included in the monitoring of the fiscal operations is a review of cost allocation plans. Desktop monitoring of WisWAP system reports and reports submitted by the subgrantee in advance of the on-site administrative review contribute greatly to the information profile of the agency.

Each agency receives an on-site visit by Division administrative review staff to review a sample of materials to confirm that they meet or exceed specifications. On-site staff will also check the subgrantee's purchasing records to see that appropriate documents are maintained demonstrating that the materials purchased meet or exceed specifications. For subgrantees that maintain a warehouse, a spot check of Safety Data Sheet (SDS) availability will be completed.

Data on production and expenditures are reviewed monthly to ensure that the statewide average cost per unit does not exceed expenditure limits and is in compliance with Division requirements. This data is available as needed by the QA Section from the WisWAP reporting database.

**Activity 2:** Dwelling unit inspections review the quality and appropriateness of work, using criteria that align with the quality of specifications outlined in WPN 15-4 Section 1, an assessment of the original audit, the accuracy and completeness of the pre- and post-work inspections, and other on-site items. Dwelling unit inspections include both in-progress and completed units, with emphasis placed on in-progress units and heating system replacement and repair. The Division will make additional on-site visits of work in-progress with all subgrantees to assess compliance with safe work practices, adherence to lead safe weatherization protocols, comprehensiveness of final inspections, and other applicable criteria. Training and technical

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assistance is provided during in-progress visits as needed. If imminent health or safety concerns are identified at a job site, the subgrantee is required to address such issues immediately. The Division will make as many visits as necessary and for which resources are available.

The Division will subcontract on-site inspections to a third-party as needed to supplement the monitoring described above. The subcontractor will submit a QA Inspection Worksheet, provide an extensive photo report of all weatherization work and any findings, and complete a Quality Satisfaction Questionnaire on each inspected home. Technical Assistance monitors then complete extensive file reviews on every inspected unit, reconciling energy audit recommendations to the actual work completed and assessing the subgrantee's project management and internal QC process. Reports prepared by the subcontractor will be used to assist the Weatherization QA Section in meeting Quality Assurance goals. Both Division inspections and any subcontracted inspections are entered and compiled in the QA reporting database.

QA inspection contractors that report inspections not completed, report findings clearly contradicted by their photo report or by the subgrantee's final inspection, fail to maintain required permits and insurance coverage, or deliver inspection reports that materially misrepresent the weatherization work completed may have current inspection contracts suspended. In especially egregious cases, as required by WPN 16-4, the Division will reserve the right to debar a contractor or any successor company from providing services to Wisconsin weatherization subgrantees. Wisconsin weatherization program standards provide clear guidance to subgrantees regarding contractor performance management, to conform with DOE requirements and State law. Included is specific information on actions or conditions that may trigger termination of a contract. The Division will require that subgrantees report every case where a contract is terminated for cause. As required by WPN 16-4, the Division may, upon review of the circumstances, debar that contractor from performing work for any subgrantee, for a specific period of time. The Division will comply with 2 CFR 200.338 and 2 CFR 180 when proceeding with debarment.

**Activity 3:** Client file reviews verify the completeness of documentation among other items. File reviews will be completed, as noted, for every DOE funded building inspected. The Administrative Review team selects and reviews an additional sample of client files, including clients to whom service was deferred or denied. Numerous criteria are evaluated for each file including customer eligibility, accuracy of the energy audit, completeness of the work order, inspection certification forms, and compliance with health and safety requirements. Compliance with policies related to service of rental properties will be verified. File reviews include clients deferred or denied service.

The Division's monitoring goals for this program year for each subgrantee are:

1. All 18 subgrantees (20 contracts) will have an administrative review conducted.
2. On-site inspection will occur on a minimum of 5% of the DOE funded units weatherized. Inspections are distributed throughout the program year.
3. Inspection of files will occur on a minimum of 5% of the DOE funded units weatherized.

In addition, each subgrantee is required to have a full financial and compliance audit conducted annually unless total federal funding is less than \$750,000. If less than \$750,000, an audit will still be completed but

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not paid for with DOE funds. The Division reviews the annual audit and takes any actions necessary to correct problems identified by the audit, resolve questioned costs, or recover funds if necessary.

Upon completion of a monitoring visit, the QA staff holds an exit conference with the subgrantee staff. Discussions are had concerning the observations of the visit. Exit conference topics include:

1. Programmatic strengths
2. Programmatic weaknesses
3. Training needs and recommendations
4. Deficiencies requiring immediate corrective action

A copy of the Division's QA report will be provided to the subgrantee within 30 days with any requirements specified. When minor issues are identified, they will be reported as "Concerns" and the subgrantee will be responsible for making sure the issue is addressed on future jobs. When other deficiencies are identified as not meeting program standards, subgrantees will be required to take corrective action within 30 to 45 days. When recurring deficiencies are identified, the Division will determine what additional action is appropriate.

The Division's QA Technical Assistance monitors follow up on items addressed in Administrative Reviews on a regular basis throughout the year. If a subgrantee fails to resolve an issue, the Division reserves the right to take any of the following actions: modification, suspension, or termination of the contract.

It is Division policy to have follow-up telephone contact regarding any complaints about quality of workmanship. If additional investigation is required, an on-site visit will be completed to verify the quality of work being performed meets federal and state specifications. In the event the quality of the work was substandard, the subgrantee will be required to correct the deficiency.

In addition to the monitoring activities described above, the Division utilizes several tools to continuously assess each subgrantee's risk of noncompliance with state and federal regulations. These tools include but are not limited to:

- The Contract Planning Workbook, a Division designed budgeting tool that assists in assessing prior experience with weatherization awards, personnel levels and training needs, and in determining labor rates.
- Comparison of estimated measure costs with actual reported costs analysis completed annually by Slipstream.
- Annual training plans developed by subgrantees.
- Annual financial audits completed by each subgrantee per 2 CFR 200.501.
- The annual State of Wisconsin Single Audit. The Weatherization Assistance Program is identified as a major program that is audited at least once every three years. Any audit finding is identified in a memo from the Legislative Audit Bureau.
- Annual Subgrantee Risk Assessments are performed using a subgrantee weatherization program evaluation tool developed by DEHCR for this purpose. From DEHCR's perspective, a risk assessment is

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an evaluation of each subgrantee's ability to operate the Wx Program according to DOE rules and regulations and policies established by the Division. The results of each subgrantee's risk assessment will identify if there is any cause for concern and/or reasons for additional focus from the QA Monitoring and/or the Administrative Review teams, and the potential need for refresher training opportunities. Each subgrantee will be sent the results of their risk assessment and, if determined to be a potential high risk, they may be required to develop a Corrective Action Plan, as necessary based on the risk factors. Subgrantees with higher scores may receive more intensive or more frequent monitoring.

- Quarterly Contract Performance Reviews are performed based on production goals, building unit goals and fund expenditures identified in the approved annual Weatherization Monthly Contract Plan. Funding may be adjusted as a result of the reviews. If a subgrantee is not within 10 percent of planned production and expense goals, they are required to provide a plan describing how the subgrantee will meet contract expectations by the end of the following quarter.

A DOE report on successes and significant problems will be completed regarding the level of subgrantee monitoring, major findings and resolutions, and training and technical assistance needs in all agency functions including programmatic, administrative, technical, and financial areas. Agencies that are considered by the Division to be high risk due to extensive production or quality issues, financial issues, or program management concerns may be required to create an action plan detailing an improvement strategy. The Division will report on the status and success of agency improvement strategies and training. Confirmed sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

The Division does not provide services directly to low-income families. As such, the provisions of WPN 16-4 related to "Direct Service Grantees" do not apply.

#### **V.7.4 Training and Technical Assistance Approach and Activities**

The Division characterizes training activities as a specific deliverable training session or a system of training sessions, while technical assistance activities are characterized as program development projects or maintenance. Both training and technical assistance deliverables are driven by the overall objectives of saving energy and reducing the state's carbon dioxide and other greenhouse gas emissions. To reach those objectives, the provider network must deliver quality installations, at the lowest possible cost, to the greatest possible number of dwellings. Every training or technical assistance activity delivered is considered in the light of those objectives.

Wisconsin anticipates allocating approximately 16% of the new DOE funding for Training and Technical Assistance (T&TA). These funds are retained by the State or allocated to subcontractors that provide the following services, by percentage:

39% - State staffed monitoring and oversight of subgrantees.

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15% - Statewide T&TA services including the training program, technical assistance and development projects, and Quality Assurance inspections.

46% - Subgrantees' local T&TA budgets.

Of the statewide T&TA services (15%) and subgrantee's local T&TA budgets (46%), we anticipate approximately 51% of the DOE funds will be allocated for Comprehensive Tier 1 training and 49% for Specific Tier 2 trainings.

In July 2017, the Division entered into a three-year contract agreement (with two optional two-year renewals) for Training and Technical Assistance services with Slipstream.

As a part of the Training and Technical Assistance (T&TA) planning process, annual work plans are developed by Slipstream based on an annual subgrantee one-on-one training needs assessment, real-time surveys, and other DOE requirements, including but not limited to DOE Project Officer feedback. The work plans are reviewed internally by Division staff, the Weatherization Technical Development Work Group (TDWG), and various subcommittees of the Weatherization Operators of Wisconsin (WOW) organization. The work plan may be modified based on input from those groups.

Subgrantees are also required to develop an annual training and technical assistance workbook. The subgrantee plans include a needs assessment survey, training not available through the training contract, local training delivery systems, the costs of sending staff to trainings, and customer education.

#### **Training Activities**

Training is delivered through various mechanisms. Wisconsin's Comprehensive Tier 1 training program includes standard trainings encompassing occupation-specific training programs associated with the WAP Job Task Analyses. Wisconsin's Standard Training Plan provides a central training framework and addresses both short and long-term training needs. The subgrantee T&TA plan, referenced above, provides funds to subgrantees for local training needs and initiatives.

Wisconsin's Specific Tier 2 training program includes Production Based Training (PBT) and the biennial technical training event, Weatherize Wisconsin. The training event provides a venue for Wisconsin's weatherization professionals to showcase best practices and cost-effective solutions. PBT immediately targets subgrantees with deficiencies noted through Quality Assurance reviews and other performance factors, with the goal of providing training within a month of the referral.

Additionally, Wisconsin is the host state for the Better Buildings: Better Business Conference. The conference offers 2.5 days of workshops that focus on building performance, mechanical systems, diagnostic testing and customer education and services. Select sessions provide BPI continuing education credits.

The Division hosts an annual training conference, Home Energy Plus Training Conference, brings together agency staff from the energy assistance program, the weatherization program and utility representatives. The



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training conference conducts concurrent sessions that focus on weatherization, energy assistance, program partnerships, and creative coordination efforts. Approximately 300 participants from all the programs can network, learn about other resources that are available to customers and improve collaboration.

The technical assistance work plan allows the Division to provide one-to-one guidance on financial management, PBT, and the Weatherization Assistant energy audits. In accordance with WPN 15-4 Section 4, Slipstream has integrated the respective Job Task Analysis requirements into Wisconsin's existing training curriculum.

**Comprehensive Tier 1 trainings:**

**Energy Auditor** – expires 12/14/2021

Consists of three courses: Basic Energy Auditor (5 day), Weatherization Assistant for Beginners (2 day), and Intermediate Energy Auditor (2.5 day)

**Retrofit Installer Technician** – expires 12/14/2021

Consists of one course: Retrofit Installer Boot Camp (4.5 day)

**Crew Leader** – expires 12/14/2021

Consists of one course: Weatherization Crew Leader (2 day)

**Quality Control Inspector (QCI)** - expired 1/13/2019

Consists of one course: Quality Control Inspector (3 day)

Slipstream submitted a renewal application to IREC on November 14, 2018. Application review was completed on January 14, 2019. The onsite visit was completed on February 11, 2019 with no findings and six commendations. The application is awaiting IREC final approval.

Multifamily Energy Auditor training – The Division is working with Slipstream to develop a Multifamily Energy Auditor training during the program year and is cross walking it with the JTA.

**Building Science Principles Training Session** development is underway with Slipstream for all Home Energy Plus Weatherization Providers and will focus on the science/physics of Air Flow, Heat Flow and Moisture Flow, and illuminate the concept of “House as a System” thinking by providing examples, then test application of knowledge and comprehension with a case study. The training will be offered during program year 2019.

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Additional training may be offered based on the annual T&TA Workbook that each agency completes that includes a needs assessment survey. The following trainings are cross walked with JTA. Typical workshops include:

- Air Sealing through Zone Pressure Diagnostics
- Asbestos Weatherization Bridge
- Basic Diagnostics & Air Sealing
- Forced Air Heating System Testing & Diagnostics
- Planning for End State Conditions
- Targeted Dense-Pack and Advanced Insulation Techniques

Regular JTA training is offered every three to six years or as needed based on the annual needs assessment and changes to the program requirements, technologies and techniques.

#### Standard Training Plan

Administered and delivered by Slipstream, the Standard Training Plan provides specific trainings that are available each year. This training system provides courses at the basic, intermediate, and advanced levels for installers, energy auditors, final inspectors, data management and support staff, and fiscal and program management staff. This allows Wisconsin to offer Tier 1 Training for all WAP personnel (as required by WPN 15-4, Section 4), as needed, based on the one-on-one reviews with the Subgrantees. Trainings cover 1-4 unit and 5+ unit site-built housing as well as manufactured homes, and include classroom, props and field components. Under the existing Standard Training Plan and funding level, the training system has the capacity to provide up to 1,400 training slots per year, with more than 60 training sessions. While a specific list of core trainings is delivered each year, the annual work plan will vary based on training needs assessments and funding levels.

As referenced above, subgrantees are required to develop an annual training and technical assistance plan for their allocation. As a part of the annual planning process, the Division provides subgrantees with a list of potential trainings for the upcoming year. They are asked to identify any training needs in addition to the Standard Training Plan, within their T&TA plan. Commonly identified training needs are added to the annual plan. Uncommon subgrantee training needs must be supported by the subgrantee's local plan. Each subgrantee is required to designate a Local Training Officer (LTO) and secondary LTO as a part of their T&TA plan. The LTO facilitates or provides local training, coordinates training for subgrantee employees and subcontractors, and works directly with Slipstream. The major responsibilities of the LTO are to:

1. Assist Slipstream to ensure that training is provided at the appropriate track and level for subgrantee staff.
2. Provide feedback and recommendations on trainings and related issues.
3. Contact Slipstream for PBT in response to Quality Assurance reviews.
4. Assist Slipstream in making arrangements for on-site facilities for Standardized Training Plan sessions held locally.

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#### **Customized Training and Support: Production Based Training (PBT)**

The PBT system, Wisconsin's Tier 2 Training program, was developed to provide immediate training for subgrantee staff and subcontractors with deficiencies noted through Quality Assurance monitoring or other performance factors. Typically, the process starts with Quality Assurance staff identifying specific needs and assessing the severity of the problem. An on-site trainer provided by Slipstream will then respond, usually within a month of the referral. Training is available in twenty-eight different topic areas, including administration, financial procedures, and weatherization technical requirements. Examples of PBT include advanced air sealing, and reconciliation of direct labor rates. These visits are sometimes combined with technical assistance funds to provide on-site support in a technical area. Visits for PBT are designed to provide training and support for specific crews or contractors whose work was cited by our Quality Assurance team. The support is hands-on technical training, delivered without a classroom, during the weatherization process. The trainer works directly with the installers to improve their skills while completing a job.

Additional training and technical assistance is available for subgrantees whenever our evaluations identify lower performance levels. Additional studies have been performed on high performing subgrantees to determine what helps them succeed so that information can be shared with others in the state.

#### **Required Subgrantee Training Attendance**

Subgrantee attendance is typically required at trainings or meetings where Division policy changes are reviewed. Specific trainings and applicable certifications are required for lead renovator, asbestos disciplines that allow for the safe weatherization of buildings, and proper work procedures when mold and moisture problems are noted.

Attendance for all training is tracked in a database maintained by Slipstream. The database is also used to track renewals for various certifications.

#### **Energy Auditor Certification**

Since 2003, Wisconsin has been providing annual five-day Basic Energy Auditor trainings with a certification test at the end of the training. The Basic Energy Auditor certification became mandatory for all energy auditors on July 1, 2009. Certification requires successfully completing the Basic Energy Auditor training and the Weatherization Assistant for Beginners course. This includes training in both the National Energy Audit Tool (NEAT) and the Mobile Home Energy Audit (MHEA). Since 2007, 199 Energy Auditors have been trained and certified to work in Wisconsin's program. New energy auditors who are not yet certified must have their work reviewed by a certified energy auditor prior to issuing any work orders. Intermediate Energy Auditor training is also offered and IREC accreditation is in progress.

Per the Home Energy Plus Weatherization Program Manual, all persons auditing homes with the Wisconsin Weatherization Assistance Program shall obtain a Wisconsin Weatherization Basic Energy Auditor Certification within 12 months of beginning to audit homes for the program.

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Staff working toward a Basic Energy Auditor Certification will be considered an Energy Auditor Trainee and shall have their audits reviewed and signed-off on by a certified Energy Auditor. Completion of the Basic Energy Auditor Certification requirement advances the energy auditor beyond the trainee status.

Three requirements shall be completed to become a certified Basic Energy Auditor:

1. Meet the DOE Weatherization Assistance Program Core Competencies pre-requisite for Basic Energy Audit Competencies, which are:

- Ability to read and write legibly;
- Basic verbal and written communication skills;
- Basic construction knowledge;
- Basic math skills; and
- Basic computer skills.

2. Complete and pass the Basic Energy Auditor Course.

3. Complete and pass a Basic Weatherization Assistant course.

Further details can be found in a document called [Core Competencies for the Weatherization Assistance Program](#) on the Home Energy Plus Website and in the NREL Energy Auditor Job Task Analysis. The new certification for the BPI/DOE Energy Auditor (EA) and Quality Control Inspector (QCI) have gone through a revision and go into effect March 1, 2019. The majority of Wisconsin's QCIs completed recertification in 2018. Wisconsin anticipates that most renewing candidates will follow the Home Energy Professional QCI: Renewing Certification Candidates when renewing from the old scheme and will only need to pass the EA field exam. The Division and Slipstream will work with current QCIs candidates to ensure that they have EA prerequisites and the necessary Continuing Education Units to bypass having to challenge the EA written exam. A refresher energy auditor training is planned for new EA/QCI candidates. During PY19 Wisconsin will assess if there is greater need for preparing workers that are not currently energy auditor certified but wish to become BPI EA/QCI certified where the candidate will need to complete a written and field exam.

#### **Training Management and Tracking System**

The Home Energy Plus Training Management and Tracking System provides training information and training staff recordkeeping as well as supporting training administrative functions. All information related to weatherization training workshops, webinars, conference, as well as special meeting or activities such as PBT and training retention activity participation is tracked in the system. The system interaction with the Home Energy Plus T&TA website includes the events calendar, online registration and posting of event specific materials.

#### **Technical Assistance Activities**

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Broadly, technical assistance funds are used to enhance and maintain the quality of the services available to Wisconsin's Weatherization Assistance Program customers. Projects vary widely, and examples include research on specific weatherization measures or an on-site consultation for a subgrantee on quality assurance issues. Generally, a project must in some way work to further the objectives or requirements of the program. Listed below are the in-progress or planned technical assistance projects for this funding period.

#### Major Home Energy Plus Technical Assistance Projects for PY2019

- **Weatherization Customer Guidebook** – Maintenance of the Weatherization Customer Guidebook will continue. This web-based product allows subgrantees to create a customized guide to the weatherization measures completed for each single-family home weatherized. The Guidebook includes maintenance requirements for each measure, as well as general energy management tips. The Guidebook went live on October 1, 2008 and is required for single-family and manufactured homes.
- **Document Design Services** – Document design and support for the Home Energy Plus Programs brochure, the Wisconsin Energy Auditor Guide, and Weatherization Field Guide. Wisconsin completed a major revision of the Weatherization Field Guide in PY 2018 to incorporate the relevant SWS requirements as required by WPN 15-4, Section 1.
- **Weatherization Measures Support** – Analysis and maintenance of measures and field protocols. Currently in progress is an annual review of measure savings-to-investment ratios, combustion safety protocols, and new water heater technologies.
- **Self-Evaluation Savings System (SES)** – Starting in 2007, Wisconsin completes a Self-Evaluation Savings (SES) study that analyzes the savings achieved in weatherized natural gas units. Actual pre- and post-weatherization natural gas and electric consumption is collected from our regulated utilities. Data collected is utilized in a biennial analysis of the therm and kWh savings of weatherized homes from the most recent program years. Generated results from the analysis are presented in a detailed report that provides information for the full program and at a Grantee level.
- **Energy Audit Maintenance** – Energy audit maintenance, coordination, and enhancement including managing the set-up libraries, program upgrades, and customizing the audit, as feasible, for Wisconsin use. Wisconsin will continue to work with Oak Ridge National Laboratory (ORNL) to test the new MulTEA tool for small multifamily buildings. Wisconsin will also continue working with ORNL to integrate a web-based version of Weatherization Assistant when it is available.
- **Home Energy Plus Information Call Center** – Provides for the operation and management of a call center. This is a toll-free number and serves as an entry port for the public to the Home Energy Plus programs. Each year on average, the Call Center fields about 40,000 calls related to the Energy Assistance and Weatherization Program.
- **Home Energy Professional Quality Control Inspector Planning** – As noted in Section V.4.3, Wisconsin has implemented a Grantee-Developed QCI policy to comply with WPN 15-4 Section 3.

#### V.8 Energy Crisis and Disaster Plan

##### Energy Crisis Plan

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n/a

**Wisconsin Disaster Response Plan**

In accordance with DOE's Weatherization Program Notice 12-07, the declaration of a disaster by the President or Governor is sufficient cause for the State of Wisconsin WAP to implement a series of amended procedures in those affected areas to allow the WAP subgrantee agencies to address the needs of the WAP eligible or previously weatherized low-income families affected by disaster conditions. Wisconsin recognizes that WAP has a very limited role in any disaster response plan. The use of DOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials

**Allowable Re-Weatherization Activities**

For communities or counties in Wisconsin that the President or Governor has declared a disaster area, local WAP agencies will be permitted to use DOE resources (truck, equipment, staff labor, and materials) and funds to re-weatherize affected homes after FEMA funds and insurance payments have been applied to the repair of the structure. The re-weatherization work will be performed in accordance with field procedure guides already established by the Wisconsin WAP and will include the following allowable costs:

- Limited clean-up in those areas of the home where WAP services will be provided. These costs will likely be charged as incidental repairs.
- The performance of an energy audit to determine the services to be provided. The audit will take into consideration all existing WAP materials previously installed and still intact and useful.
- Mechanical systems (central heating, hot water, etc.) and appliances will be inspected, and repaired or replaced as needed based on damage and wear and according to our usual standards.
- The auditor may consider deferring the job if the damage to the home appears to impact the structure and the materials to be installed cannot be safeguarded.
- The file must contain documentation of the damage through reports and digital or printed pictures of the affected area.

Each unit will be reported with specific tracking codes in WisWAP. This notation will be part of the data entry, so it can be easily identified and sorted for future reference. The costs for these re-weatherized units will be reported to DOE in the same manner as other re-weatherization cases.

**Work in Progress Cases**

In some cases, the local WAP agency may have work in-progress at homes where severe damage has occurred. These units and the associated costs have not been reported to DOE yet there may be significant loss of resources due to the damages.

These homes will be identified in the WisWAP system so that proper reporting of costs can be easily tracked.