

**U.S. Department of Energy**  
**WEATHERIZATION ANNUAL FILE WORKSHEET**  
(Grant Number: DE-EE0009906,) State: ME, Program Year: 2025

**IV.1 Subgrantees**

Subgrantee	City	Tentative	
		Funding	Units
Aroostook County Action Program	Presque Isle	\$338,321.00	39
Community Concepts, Inc.	Lewiston	\$1,244,612.00	43
Downeast Community Partners	Ellsworth	\$15,000.00	2
iCAST	Statewide	\$314,000.00	
Kennebec Valley Community Action Program	Waterville	\$625,153.00	35
Penquis Community Action Program	Bangor	\$779,786.00	41
Waldo Community Action Partners	Belfast	\$15,000.00	2
Western Maine Community Action	East Wilton	\$127,791.00	14
York County Community Action Corporation	Sanford	\$241,525.00	10
<b>Total:</b>			

**IV.2 WAP Production Schedule**

Weatherization Plans	Units
Total Units (excluding reweatherized units)	186
Rewatherized Units	

Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	186
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	186
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$1,489,952.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	186
H	Average Program Operations Costs per Unit (F divided by G)	\$8010.49
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$8,010.49

**IV.3 Energy Savings**

**U.S. Department of Energy**  
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Method used to calculate energy savings: MaineHousing will be using the DOE WAP algorithm to calculate energy savings.	
Other (describe below)	
Estimated energy savings (Mbtus):	<u>\$12,013</u>
This year estimated energy savings:	\$12,013
Prior year estimated energy savings:	\$7,823

#### IV.4 DOE-Funded Leveraging Activities

See Maine 2025 DOE State Plan Master File.
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#### IV.5 Policy Advisory Council Members

Glenn Pole, Chair	Type of organization: Efficiency Maine Trust, Board of Directors Phone: (866) 376•2463 Email: <a href="mailto:efficiencymaine@efficiencymaine.com">efficiencymaine@efficiencymaine.com</a>
Mark Isaacson Vice Chair	Type of organization: Efficiency Maine Trust, Board of Directors Phone: (866) 376•2463 Email: <a href="mailto:efficiencymaine@efficiencymaine.com">efficiencymaine@efficiencymaine.com</a>
Kenneth Colburn, Treasurer	Type of organization: Efficiency Maine Trust, Board of Directors Phone: (866) 376•2463 Email: <a href="mailto:efficiencymaine@efficiencymaine.com">efficiencymaine@efficiencymaine.com</a>
Joan Welsh, Secretary	Type of organization: Efficiency Maine Trust, Board of Directors Phone: (866) 376•2463 Email: <a href="mailto:efficiencymaine@efficiencymaine.com">efficiencymaine@efficiencymaine.com</a>
Heather Furth	Type of organization: Efficiency Maine Trust, Board of Directors Phone: (207) 376-2463 Email: <a href="mailto:efficiency@efficiencymaine.com">efficiency@efficiencymaine.com</a>
Suzanne MacDonald	Type of organization: Efficiency Maine Trust, Board of Directors Phone: (866) 376•2463 Email: <a href="mailto:efficiencymaine@efficiencymaine.com">efficiencymaine@efficiencymaine.com</a>
Christopher Rauscher	Type of organization: Efficiency Maine Trust, Board of Directors Phone: (866) 376•2463 Email: <a href="mailto:efficiencymaine@efficiencymaine.com">efficiencymaine@efficiencymaine.com</a>
Daniel Brennan (Maine State Housing Authority Ex Officio)	Type of organization: Unit of State Government, Maine State Housing Authority Phone: (207) 626•4600 Email: <a href="mailto:dbrennan@mainehousing.org">dbrennan@mainehousing.org</a>

Dan Burgess (Governor's Energy Office Ex Officio)	Type of organization: Unit of State Government, Governor's Energy Office Phone: (207) 624-7446 Email: <a href="mailto:daniel.burgess@maine.gov">daniel.burgess@maine.gov</a>
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IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

Date Held	Newspapers that publicized the hearings and the dates the notice ran
November 19, 2024	<i>Notice of Public Hearing was published on November 5, 2024 in the following daily newspapers:</i> <i>Kennebec Journal</i> <i>Waterville Morning Sentinel</i> <i>Brunswick Times Record</i> <i>Portland Press Herald</i> <i>Bangor Daily News</i> <i>Lewiston Sun Journal</i> <i>The public hearing transcript will be sent to the DOE Regional Office as part of Maine's 2025 DOE Application.</i>

IV.7 Miscellaneous

Bobbi Crooker is named as MaineHousing's Business Officer, Recipient Business Officer and is the representative authorized to act on behalf of MaineHousing to negotiate the award. All DOE official correspondence related to the award will be addressed to the Recipient Business Officer.

Bobbi Crooker is named as MaineHousing's Recipient Principal Investigator and is the technical representative authorized to act on behalf of MaineHousing as project manager for the award. The Recipient Principal Investigator is the prime point of contact for the DOE Project Officer during the project period of performance and will receive a copy of all DOE official correspondence related to the award.

**Program Partners:**

Grantee WAP management staff attend regularly scheduled monthly meetings with Subgrantee Housing Directors. These meetings provide ongoing opportunities for Subgrantees to provide input regarding WAP implementation, including suggestions for changes and content in the DOE Annual State Plan.

Grantee WAP team participate in the bimonthly NASCSP Region 1 meetings. This is an opportunity for the regional Grantees to discuss best practices and ways to address barriers experienced at the state level.

**Weatherization Readiness Funds (WRF):**

Maine State has the fifth oldest housing stock in the nation. Many Maine homes are older than 1940 and are in need of repairs before any weatherization measures can be installed. MaineHousing will follow DOE guidance in 24-9 and use WRF to provide necessary repairs (e.g., Health and Safety issues, structural) in dwellings that have been deferred from receiving weatherization or will be deferred for costs exceeding allowable averages for Health & Safety and Incidental Repair services. MaineHousing's Subgrantees maintain a list of homes deferred for weatherization services that will benefit from the WRF.

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Distribution of WRF Funds: MaineHousing will distribute the funds among our Subgrantees. The Subgrantees will identify projects from their deferral tracking list to complete repairs using WRF.

WRF Household Prioritization: MaineHousing will require Subgrantees to use the same prioritization method used to determine priority for weatherization services. Priority for weatherization services is identified through the system of record based on household composition, annual energy consumption usage for heat (cost), and poverty level. Households with an older adult (60 years or older), a person with disabilities, and/or a child younger than six (6) years of age will be given priority for WRF and weatherization services.

Restrictions related to the funding: WRF funding will be restricted to eligible site-built single family and manufactured housing. CAA must certify that the home will receive WAP services after the WRF tasks have been completed. Projects that receive WRF must also be weatherized using DOE WAP funding. The DOE funded weatherization job must be completed within 6 months of the WRF job completion.

Grantee Monitoring of WRF activities: The Grantee will work closely with the Subgrantee personnel to ensure there is quality workmanship, financial systems and procedures in place. Grantee Technical staff will inspect each Subgrantee's completed work to verify compliance with the Installation Standards set forth by DOE SWS and Maine State Building codes. The Grantee will monitor/inspect a minimum of 10% of the WRF completed units.

The Grantee will track the funds for each building and unit including the measures/repairs and costs associated with the WRF completion through the system of record. The funds will be monitored as part of the annual monitoring of the Subgrantee to ensure funds are expended in accordance with this plan and to ensure the end result is a completed weatherization unit.

Cost per Unit The WRF Cost per Unit is set at \$15,000.00. Each subgrantee will be held to the ACPU of \$15,000, waivers may be considered on a case-by-case basis if as a state the ACPU is below that limit.

**Work in Progress:**

Grantee intends to apply to DOE for use of the regional priority lists. Maine is located in Region 3 (cold) and intends to apply to DOE to use all three established regional priority lists: single-family site-built homes, manufactured homes, and low-rise multifamily projects. The Grantee will work with the DOE Technical Project Officer to apply for and implement these lists for the Maine WAP network.

Maine has applied to transition the energy auditing software to ECOS. The intent is to begin the Program Year 2025 Weatherization Assistance Program in ECOS. At that time, Maine will transition out of the existing software, HEAT Enterprise. All historical data from Weatherization stored within HEAT will be provided to the appropriate subgrantees as well as archived within MaineHousing.

Maine intends to develop a mentorship program to expand the Quality Control Inspector capacity in accordance with WPN 22-4. The mentorship partnership would expand the network statewide to ensure training is diverse, encompasses an array of best practices, and ensures the responsibility is evenly distributed.

Policy Advisory Council (PAC): 2009 Public Law Chapter 372, An Act Regarding Maine's Energy Future, repeals 5 MRSA §3327, which established the Energy Resources Council, and places oversight of energy related programs under the jurisdiction of the Efficiency Maine Trust as of July 1, 2010. The new law requires that "after July 1, 2010, the Maine State Housing Authority, prior to applying for federal funds on behalf of the State...for weatherization, energy conservation and fuel assistance pursuant to the Weatherization Assistance for Low Income Persons Program administered through the United States Department of Energy and the Low Income Home Energy Assistance Program administered through the United States Department of Health and Human Services, shall submit to the board for its review and input the authority's implementation plans for the use of such funds. The plans must provide for coordination by the Maine State Housing Authority in its use of such funds with the programs administered by the trust.... The Maine State Housing Authority shall include in its plans any recommendations of the board to the extent the recommendations are consistent with the applicable federal guidelines governing the use of the funds." The Efficiency Maine Trust is controlled by a board of nine voting members. The statutory membership includes the Director of the Maine State Housing Authority, the Director of the Governor's Office of Energy Independence and Security and seven members appointed by the Governor that adequately represent the interests of commercial energy consumers, industrial energy consumers, small business energy consumers, residential energy consumers, and low-income energy consumers. The body as a whole must include persons with knowledge and experience in

financial matters, consumer advocacy, conservation fund programs, and climate change policy.

The Efficiency Maine Trust reviewed MaineHousing's draft plans for the 2025 DOE WAP program at its October 30, 2024 meeting.

**U.S. Department of Energy  
WEATHERIZATION ASSISTANCE PROGRAM  
STATE PLAN MASTER FILE**

**(Grant Number DE-EE0009906, State: ME, Program Year: 2025)**

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## **V.1 Eligibility**

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

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

Definition of Low Income. Grantee has chosen to use the definition of household income, as described in the Home Energy Assistance Program Rule. Incomes calculated using this definition are adjusted as needed to align with WPN 25-3 PY 2025 *Poverty Income Guidelines and Definition of Income*<sup>1</sup>, WPN 22-5 *Expansion of Client Eligibility In the Weatherization Assistance Program* and any related DOE guidance thereafter, to determine household energy burden and eligibility.

Income Verification. Subgrantees obtain required income documentation and verify income eligibility as part of the intake process to certify households eligible to receive fuel assistance benefits from the Department of Health and Human Services' Low-Income Home Energy Assistance Program (HEAP). If a household member receives either TANF or SNAP assistance, that member will have Categorical Income Eligibility for HEAP, as the Maine Department of Health and Human Services has already vetted their income. Household members not listed on the TANF or SNAP documentation will need to provide all applicable income documentation. Only those households who have Categorical Income Eligibility or whose income has been verified within the previous 12 months to be at or below 200 percent poverty level are considered for weatherization services. Subgrantees will re-verify income eligibility prior to commencing an energy audit for households whose application eligibility certification has expired. Subgrantees are required to ensure client eligibility during the period in which services are delivered. Clients that do not qualify for HEAP, but are still at or below 200% of poverty or for those that choose not to apply for HEAP, but still want weatherization services will be required to complete a DOE Weatherization Assistance Program only application and provide all required documentation to determine Program eligibility.

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

Grantee has chosen the following definition of low income for the basis of eligibility for the Weatherization Assistance Program (WAP): Low income means that income in relation to household/family size is 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.

#### **3. Describe the process for ensuring qualified non-citizens are eligible for weatherization benefits**

A household may include:

- a. A qualified non-citizen who has obtained the status of a qualified non-citizen lawfully admitted for temporary residence under Section 210 of the Immigration and Nationality Act by approval of an application and are categorized as Special Agricultural Workers (SAWS) who perform seasonal agricultural work during a specified period of time; or
- b. A qualified non-citizen who has obtained the status of a qualified non-citizen lawfully admitted for temporary residence under Section 245A and 210A of the Immigration and Nationality Act by approval of an application and who is aged, blind and/or has a disability as defined in Section 1414 (a)(1) of the Social Security Act (Public Law 74271); or
- (c) Cuban or Haitian qualified non-citizen as defined in Public Law 96422, Section 50I (e).

Households are considered eligible if qualified non-citizen members have a "Green Card" or show permanent residence (I-551 Alien Registration Card, Passport, I-688 Employment Authorization Card, I-766 Employment Authorization Document, I-94 with R-1 or R-2 status designation).

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

#### **1. Procedure to determine that units weatherized have eligibility documentation**

Eligible Dwellings: Household members must meet one of the following eligibility criteria to be considered for weatherization services and to assure compliance with the requirements of 10 CFR 440.22:

- a. A dwelling unit shall be eligible for weatherization assistance if it is occupied by a household who has Categorical Income Eligibility or whose income is at or below 200 percent of the poverty level and/or meets the eligibility for assistance under the Low Income Home Energy Assistance Act of 1981 as determined in accordance with criteria established by the Director of the Office of Management and Budget; or

- b. Prior to weatherizing entire rental buildings, a specific eligibility test will be applied. Not less than 66 percent (or 50 percent in the case of rental dwellings of two (2) or four (4) dwelling units), must be eligible or must become eligible dwelling units within 180 days under a federal, state or local program for rehabilitating the building or making similar improvements to the building.
2. Multi-family eligibility – (WPN) 22-5 expanded WAP’s categorical income eligibility to include HUD means-tested programs’ income qualifications at or below 80% of Area Median Income (AMI). WPN 22-5 was accompanied by three spreadsheets listing HUD properties which were categorically or potentially income eligible.
3. [Weatherization Memorandum 109: Eligible Buildings - U.S. Department of Housing and Urban Development \(HUD\) Lists \(energy.gov\)](#)
4. Multi-family eligibility – WPN 25-4 expanded WAP’s categorical income eligibility to include properties qualifying under USDA means-tested programs with income limits at or below 80% of Area Median Income (AMI). WPN 25-4 included a link to the USDA website. DOE identified buildings that meet the requirements of 10 CFR 440.22 (b)(2). These buildings qualify because at least 66% of their units receive rental subsidies through USDA or HUD means-tested programs. WPN 25-4 also provides an attachment listing the eligible properties.

Eligibility Documentation. All subgrantee files and records contain authorized HEAP applications with verified income documentation (home owners and renters), as well as *WAP Consent Form*, *Proof of Ownership* and *Landlord/Tenant Agreement* (if applicable). All documents are available for review by state or federal staff as needed. Documentation of categorical eligibility will be obtained and kept in client file.

Undue or Excessive Enhancements. Grantee conducts desk reviews on weatherization jobs to confirm that no undue or excessive enhancements occurred to the value of the dwelling unit. If costs are questionable, an “Open Item Report” is issued to the Subgrantee. Dialog and documentation determines whether the cost is allowable. If not, it is removed from the DOE billing and the subgrantee uses non-WAP funding.

## **5. Describe re-weatherization compliance**

The Consolidation Appropriations Act of 2021 allows Grantee to weatherize units 15 years after the date of such previous weatherization was completed to receive further financial assistance for weatherization utilizing DOE and other federal program funds. Grantee requires that these units be reported separately. Each dwelling unit served must receive a completely new energy audit that takes into account any previous energy conservation improvements to the dwelling. Subgrantees are allowed to count these homes as completions for the purposes of compliance with the per-home expenditure limit in 10 CFR 440.18.

The Maine State Housing Authority (Grantee) maintains available data of previously weatherized homes and assists Subgrantees in determining compliance with the re-weatherization requirements. For weatherization jobs completed in the prior 15 years Grantee and Subgrantee rely primarily on records maintained by the Subgrantee. Weatherization jobs completed between 1998-2008 are tracked in Grantee’s Central Heating Improvement Program and Weatherization Jobs SIR database. Weatherization jobs completed 2009-September 2016 are tracked in Grantee’s ECOS database. Weatherization jobs completed October 2016 to present are tracked in Hancock Software’s web-based energy audit software system referred to as HEAT Enterprise (HEAT Enterprise). Multi-family projects will be tracked manually in an internal database.

## **6. Describe what structures are eligible for weatherization**

Grantee defines an eligible structure as a dwelling unit, including a stationary manufactured home, stick built house, and multi-family buildings. An eligible dwelling does not include a camper, or other structures designed and constructed to provide temporary living quarters. All dwelling units will have a permanent physical address documented by a current tax bill or confirmation from a municipal official.

A dwelling unit is eligible for weatherization assistance if it is occupied by a family who has Categorical Income Eligibility or whose income is at or below 200 percent of the poverty level and/or is eligible for assistance under the Low-Income Home Energy Assistance Program.

Non-traditional dwelling units such as shelters and units with a business component will be discussed with DOE prior to commencement of the project.

Maine WAP includes the following components:



- a. An individual audit for each dwelling unit;
- b. Energy savings calculations based on the American Society of Heating and Refrigerating and Air Conditioning Engineers (ASHRAE) fundamentals; and
- c. A comprehensive health and safety protocol. Prior to initiating any weatherization activities, Subgrantees are required to evaluate the physical condition of the home, the mechanical systems, and building tightness.

If the structure fails to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. See [V.1.2.5 Deferral Process](#) and [V.5.2 Energy Audit Procedures](#).

Grantee complies with its [State Historic Preservation Office \(SHPO\) Programmatic Agreement \(PA\)](#) to satisfy DOE's Section 106 requirement for all structures eligible for weatherization.

Grantee complies with DOE WAP Memorandum 110, Historic Preservation Review Process for Utilizing Weatherization Funds on Tribal Lands, to follow the written procedures of Historic Preservation on Tribal land.

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

Grantee intends to weatherize rental units/multifamily buildings with the DOE Grant Funds.

Rental units will be eligible for WAP provided that the Subgrantee has obtained written authorization from landlords/building owners and not less than 66% (50% for duplexes and four-unit buildings, and certain eligible types of multi-family buildings) of the dwelling units in the building are: (i) eligible dwelling units, or (ii) will become eligible dwelling units within 180 days under a Federal, State or local government program for rehabilitating the building or making similar improvements.

The Subgrantee is required to ensure that the benefits of the weatherization assistance on rental units accrue primarily to the low income tenants residing in the units and that no undue or excessive enhancement occurs to the value of the rental units. Additionally, the Subgrantee must require that the landlords/building owners execute the [Weatherization Rental Agreement](#), to ensure that for a period of one (1) year following the weatherization work, the tenants in that rental unit will not be subjected to rent increases unless the increases are demonstrably related to matters other than the weatherization work performed. The *Weatherization Rental Agreement* further requires adherence by the landlords/owners to the requirements of 10 CFR §440.22(b)(3) and §440.22(c)-(e), as laid out in the *Weatherization Assistance Program Guidance*.

If the landlords/owners increase the rent in violation of the *Weatherization Rental Agreement* and the *Weatherization Assistance Program Guidance*, the landlords/owners must repay the full cost of the weatherization assistance. Any dispute as to the circumstances for a rent increase will be reviewed by the Subgrantee or MaineHousing, if requested by the Subgrantee, landlord/owner or tenant.

WAP will be working closely with the DOE Project Officer and the new multifamily Subgrantees to ensure that all DOE approvals and training needs are met. Priority will be given to identifying and providing weatherization assistance to: older adult persons, persons with disabilities, families with children, high residential energy users, and households with high energy burden. Multifamily buildings because of their size and character, may offer an opportunity to meet many of these priorities. When addressing "significant energy improvements" in multifamily dwellings, WAP will contact the DOE Project Officer and refer to the WPN 22-12 Multifamily Weatherization and WPN 22-13 Weatherization of Rental Units.

**Eligible Dwelling Units.** Grantee intends to weatherize rental dwelling units occupied by income eligible (low-income) tenant(s), providing a direct benefit to the low-income tenant(s). In the event of 2-4 unit buildings, one of the units may be occupied by the owner. Grantee, consistent with Department of Energy guidance, requires the weatherization of the entire building not just the low-income units.

**Prioritization.** Rental unit buildings will be prioritized similar to single unit buildings: tenants with the highest energy use and highest energy burden (as a percentage of income) will receive priority. DOE funding is used to weatherize multi-family unit buildings provided at least 66 percent of residents in a three (3) unit property and 50 percent in a two (2) or four (4) unit property (determined on a building-by-building basis in a multi-building property) meet WAP income guidelines or HUD categorical eligibility.

**Written Permission.** Prior to conducting the energy audit, the Subgrantee must verify the ownership of the unit/building and secure landlord's/owner's and tenant's consent, in writing, to proceed with weatherization measures. In addition, the landlord and tenant are required to sign a [Weatherization Rental Agreement](#) before the Subgrantee can proceed with weatherization. The provisions of this Agreement include:

- a. **Rent Increases:** Secure landlord's/owner's and tenant's signature on a *Weatherization Rental Agreement*

that prohibits an increase for twelve (12) months because of any increase in the value of the property due solely to the weatherization work.

- b. *Sale of Property*: If the property is sold within one (1) year of the completion of weatherization work, the owner may be required to reimburse the Grantee for the cost of the weatherization material installed.

Tenant Complaints. Customer survey cards, client phone calls, and client comments during site monitoring are tracked by Grantee. Grantee technicians, program and management staff engage with clients and Subgrantees as needed to address issues. Closure is documented in applicable Grantee databases.

## **8. Describe the deferral process**

Some dwelling conditions or client circumstances may require deferral of weatherization until the issues are resolved. Documentation of all activities in the client's file is required. "Deferral" does not necessarily mean that the home will not receive weatherization services, but that until the conditions are rectified, the weatherization services are temporarily postponed.

Deferral of Services Policy. See Grantee's Weatherization Assistance Program Guidance, Section 6(J) for Grantee's *Deferral of Weatherization Services Policy*, which provides the guidelines for Subgrantees when a building should be deferred because the building is not appropriate for weatherization.

Deferral Tracking. All deferred jobs, including the reason for deferral, are entered and tracked in an excel spreadsheet developed by DOE and electronically in the appropriate system of record.

Deferral Notification: Subgrantee provides a written Notice of Deferral to each deferred client with the reason for deferral. A copy of the Notice of Deferral is retained with the weatherization job in HEAT Enterprise.

Once the applicant notifies the Subgrantee that the deferral reason(s) have been resolved/addressed the applicant will receive priority for WAP providing they still meet WAP eligibility.

Clients have the right to appeal the decision to defer WAP services. They must make this request by contacting the Manager of Weatherization Services in writing within 30 calendar days of the date the Deferral of Services Notice was signed. The request must include the reason(s) why they don't agree with this decision along with any documentation that will show that the deferral reason was made in error or not accurate.

## **9. Weatherization Readiness Funds (WRF)**

Weatherization Readiness Funds (WRF) are designated for use by Grantees to address necessary repairs (health and safety, structural issues, etc.) that may be barriers to Weatherization Activities being funded by the US Department of Energy Weatherization Assistance Program (WAP). This funding is intended to overcome barriers to weatherization. The following is the plan utilized in the state of Maine to expend the Weatherization Readiness Funding.

### **Distribution of Funding:**

The State of Maine has been allocated \$397,790 for PY 25 and will allocate the funding equally across Subgrantees. These funds will only be used in jobs funded by WAP formula funds.

### **WRF Maximum Per Unit:**

The Maximum Per Unit amount to address necessary repairs (health and safety, structural issues, etc.) that may be barriers will be capped at \$15,000.

### **Prioritization of Dwelling:**

WRF prioritization will follow the prioritization criteria used by the WAP program. In addition, WAP will prioritize customers with barriers that do not exceed the WRF Maximum Per Unit Cap (MPUC) and with energy projects that will allow WAP to adhere to its required Average Cost Per Unit (ACPU).

### **Reporting/Tracking:**

All households deferred from receiving weatherization services due to a weatherization barrier being present are tracked according to the process outlined in WPN 24-9. Subgrantees will utilize the DOE Recommended deferral tracker to track all jobs deferred from receiving weatherization services, including jobs that are remediated using WRF funding.

### **Reporting Categories:**

Each subgrantee is required to submit quarterly reports to MaineHousing. Reports must include:

- Unit ID
- WAP Intake Date
- Date(s) Deferred (if previously deferred by WAP)
- Date Weatherization Ready
- Date Weatherized
- Mailing Information (Street, City, State, Zip)
- Building Information (Type, Year Built, Fuel Type)
- Deferral Issue (Issue or Action Needed, WRF Category, Total Remediation Cost, Non-WAP Funding Source Used, WRF Fund Applied)

#### **Eligible Measures:**

WPN 24-9 determines which measures are allowable utilizing the WRF funding. Maine will use WRF funds for measures included in 22-7, as well as roof repairs and replacements. The measure list below is not exhaustive and Maine may approve additional repairs outside of this list as needed and as aligned with WPN 24-9.

- Roof repair
- Wall repair (interior or exterior)
- Ceiling repair
- Floor repair
- Foundation or subspace repair
- Exterior drainage repairs (e.g., landscaping or gutters)
- Plumbing repairs
- Electrical repair (including removal of knob and tube)
- Repair or replacement of damaged door/windows
- Lead Paint
- Asbestos (confirmed or suspected, including vermiculite), mold and/or moisture

#### **Process:**

Each one-to-four unit household served by the Weatherization Assistance Program (WAP) is first screened for necessary repairs—such as health and safety or structural issues—that may pose barriers to weatherization activities. If a barrier is identified by the Energy Auditor, the household is evaluated using the DOE-approved Health and Safety Audit. Based on this evaluation, a scope of work is developed to address the identified barriers.

Once the repairs are completed, the Energy Auditor returns to verify that all barriers have been resolved and to perform the energy assessment. The Community Action Agency (CAA) must certify that the home will receive WAP services following completion of the Weatherization Readiness Fund (WRF) tasks.

Projects that receive WRF assistance must also be weatherized using DOE WAP funds, and the DOE-funded weatherization must be completed within six months of the WRF project's completion.

#### **Braiding Funds:**

The Subgrantees will only be utilizing Weatherization Readiness Funds to address health and safety barriers to weatherize income-eligible households.

#### **Monitoring:**

The proper use of WRF funding is monitored in three ways. First, an inspection of all work completed as part of a unit's remediation is conducted by the Energy Auditor, who initially halted the energy assessment due to an identified barrier. Once that inspection is completed the household is then served by MaineHousing's WAP and is subject to 100% final inspection by the Subgrantee QCI and a minimum of 10% inspected by the state QCI with a majority of the households being inspected while work is in progress to ensure quality work is being completed. All Activities conducted utilizing WRF are reviewed as part of Grantee's annual monitoring of Subgrantee activities.

## **Funding Restrictions:**

Maine WAP does not propose putting any restrictions on the use of WRF funds outside of the defined allowable scope described in WPN 24-9. Funds for remediation measures will be used exclusively to remediate barriers that prevent the installation of weatherization measures identified in the comprehensive Health & Safety audit.

### **V.1.3 Definition of Children**

Definition of children: younger than six (6) years of age.

### **V.1.4 Approach to Tribal Organizations**

Grantee has five federally recognized Indian Tribes and each of them participate in the HEAP fuel assistance, as well as HEAP and DOE weatherization programs (WAP): Penobscot Indian Nation; Houlton Band of Maliseets; Aroostook Band of Mic Macs; Passamaquoddy Tribe, Pleasant Point; and Passamaquoddy Tribe, Indian Township. Grantee and the Indian Tribes maintain annual Memorandums of Understanding that outline the disbursement terms of WAP funds for these Tribal Entities.

The low-income members of an Indian tribe shall receive benefits equivalent to the assistance provided to other low-income persons within Maine. Grantee allocates funds to five (5) tribal organizations based upon the number of eligible HEAP clients. This has resulted in three percent of Grantee's DOE grant award being allocated to the five (5) tribes. Actual administration of the weatherization programs within tribal organizations' land is provided by Subgrantees that service areas include Counties in which Indian Tribes are located.

Process: Tribal organizations process HEAP fuel assistance applications for tribal members and verify eligibility for benefits. Subgrantees contact the local tribal organizations to obtain eligible HEAP fuel assistance applications, as well as contact information for tribal members that are at 200% or below poverty guidelines that do not meet HEAP fuel assistance income eligibility or who have not applied for fuel assistance. Upon receipt of the applications/information, audits and weatherization jobs may be scheduled.

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

Selection Method. In the case of areas currently served by a Subgrantee established under Section 222(a)(12) of the Economic Opportunity Act of 1964, as amended, funds available under this program will be granted to that Subgrantee for the same geographic area. Any new or additional Subgrantees shall be selected at a hearing in accordance with 10 CFR Section 440.14(a), as amended, and upon the basis of the criteria set forth in 10 CFR 440.15(a), as amended.

Grantee's WAP serves all counties statewide through eight (8) Subgrantees. Each Subgrantee is, in fact, a Community Action Agency or other public or non-profit entity. Grantee may expand the Subgrantee Network to add additional non-profit organizations to provide WAP services.

The Grantee ensures that each Subgrantee is selected on the basis of public comment received during a public hearing conducted pursuant to 440.14(a) and other appropriate findings regarding:

- a. The Subgrantee's experience and performance in weatherization or housing renovation activities;
- b. The Subgrantee's experience in assisting low-income persons in the area to be served; and
- c. The Subgrantee's capacity to undertake a timely and effective weatherization program.

In selecting a Subgrantee, preference is given to any Community Action Agency or other public or non-profit entity, which has, or is currently administering, an effective program under this part or under Title II of the Economic Opportunity Act of 1964. Program effectiveness is evaluated by consideration of factors including, but not necessarily limited to the following:

- a. The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
- b. The quality of work performed by the Subgrantee;
- c. The number, qualifications, and experience of the staff members of the Subgrantee; and
- d. The ability of the Subgrantee to secure volunteers, training participants, public service employment workers, and other federal or state training programs.

Subgrantee Removal. In the event that a Subgrantee is unable to complete the terms of its Subgrantee Agreement, or if Grantee determines that the Subgrantee cannot fulfill its obligations under the Subgrantee Agreement, Grantee will reach out to other Subgrantees to fulfill the terms of their Subgrantee Agreement and work with the Subgrantees to extend their WAP services into the territory needing service coverage or

Grantee will select new Subgrantee pursuant to 10 CFR Section 440.14(a), as amended, and upon the basis of the criteria set forth in 10 CFR 440.15(a), as amended. Contracts would be amended as needed to accommodate the change in service area. This process ensures that WAP services are delivered with minimal interruption to clients if this type of situation was encountered.

### **V.3 Priorities**

Prioritization. Priority for weatherization services is identified through HEAT Enterprise, based on household composition, annual energy consumption usage for heat (cost), and poverty level. Each applicant is assigned priority points at the time of eligibility determination, as follows:

1. At least one member in the household is elderly (age 60 or older). (1 point)
2. At least one member in the household is a person with disabilities (receives disability benefits). (1 point)
3. At least one member in the household is a child (under the age of 6). (1 point)
4. The household has a high energy burden (spending at least 6.9% of total income on heating costs). (1 point)

Wait Lists. Subgrantees are required to develop and maintain a wait list consisting of HEAP eligible households. Households on the Subgrantee's wait list should be weatherized in order of ranking according to HEAT Enterprise. Households with the highest WAP ranking have the highest priority. A Subgrantee may move an eligible household's priority based on geographic considerations. However, the geographic consideration should only be used as a secondary consideration. For example, if there are two equally ranked households, one can be prioritized based on location even though the other household had been on the wait list longer.

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

Maine's weather and geography directly affect energy consumption in homes. Heating requirements vary from south to north based on the District Heating Factors for the United States. Maine's 7500 to 9800 degree day environment mandates consideration of heating needs. In order to meet the additional heating needs of those in the northern and western portions of Maine, the Grantee uses a sliding scale of allocation based on recorded Heating Degree Days (HDD).

Maine's Hancock Software Energy Audit Tool (HEAT Enterprise) accounts for localized climatic variances by using climate data from the National Oceanic and Atmospheric Administration (NOAA). Heating degree hours are calculated using state climate data associated with each Maine zip code. The data set that is used to determine HDD can be found at [NOAA.org](http://NOAA.org). ([www.ncei.noaa.gov/ access/search/data-search/normals-hourly-1991-2020](http://www.ncei.noaa.gov/access/search/data-search/normals-hourly-1991-2020)).

Maine's Heating Degree Days by County (HDD):

Subgrantee	Service Area – counties	Heating Degree Days
Aroostook County Action Program	Aroostook	8,204
Community Concepts, Inc.	Androscoggin, Oxford	6,904
Community Concepts, Inc.	Cumberland	6,248
Downeast Community Partners	Washington, Hancock	6,734
Kennebec Valley Community Action Program	Kennebec, Somerset	7,255
Kennebec Valley Community Action Program	Lincoln, Sagadahoc	6,170
Penquis Community Action Program	Penobscot, Piscataquis	7,257
Penquis Community Action Program	Knox	6,352
Waldo Community Action Partners	Waldo	6,856
Western Maine Community Action	Franklin	8,078
York County Community Action Corporation	York	6,301

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

### V.5.1 Technical Guides and Materials

Technical Guides. Standards for the proper installation of materials and procedures are described in the *Maine Weatherization Standards* and the [Maine Field Guide](https://www.mainehousing.org/partners/partner-type/community-agencies/maine-weatherization-programs) which are located on the Grantee's website <https://www.mainehousing.org/partners/partner-type/community-agencies/maine-weatherization-programs>.

The *Maine Weatherization Standards* are aligned with the companion Maine Field Guide, which embodies SWS applicable to the Maine Weatherization Assistance Program. While the *Maine Weatherization Standards* and the Maine Field Guide are fully aligned, the documents are distinct. The *Maine Weatherization Standards* provides more overview and detail on overarching goals and guidance for delivery of weatherization services. The Maine Field Guide format provides clear quality standards for specific measures and test procedures using concise SWS language and photographs, and is well suited for direct use in the field.

Notification/Distribution to Subgrantees. Grantee has created and maintains a dedicated web portal for Subgrantees, which provides electronic access to current versions of technical guides, program updates, procedure manuals, standard documents, relevant client education brochures, and a link to all WAP Program Notices and Memoranda. See <http://www.mainehousing.org/partners/partner-type/community-agencies>.

Notifications of updates to program manuals or guidance are posted to the HEAT Enterprise Home/News page. This page is maintained as a "Bulletin Board" and includes highlights of updates, implementation dates and directions to guidance as applicable. Since all users view the Home/News page on log-in, this ensures that Subgrantee field staff are apprised of and directed to the details of important updates as they are implemented.

Program updates and notifications are emailed to Subgrantee Housing Directors and posted on our web portal.

Required Language. All Subgrantee Agreements contain the following language: "Subgrantee agrees to ensure that the standard work specifications for work quality outlined in WPN 22-4, Section 1, will be met and that all contracts with vendors will contain the same requirement." The Subgrantee's signature on the Agreement confirms that all expectations contained in the Subgrantee Agreement, Work Plan, and Budget are understood and implemented. The Subgrantee must deliver the executed Agreement, with Work Plan and Budget to the Grantee for approval before WAP funds will be disseminated.

All weatherization work is performed in accordance to DOE approved energy audit procedures and 10 CFR 440 Appendix A.

NEPA Review. Subgrantees may only perform activities identified in the current NEPA Maine determination.

Maine Field Guide type approval dates.

Maine Weatherization Field Guide (Single-family and Mobile Home) DOE approved on September 23, 2021

<b>Special Materials/Audit Procedures Approvals</b>	
<b>Item</b>	<b>Comments</b>
Energy Star Light Emitting Diode (LED) Lighting	Approved 10/4/2022
Energy Star Refrigerators	Approved 10/4/2022
Rigid Foam Board Insulation Complying with ASTM C 1289	Approved 8/24/2022
Lifetime Changes	Approved 7/30/2020
Spray Polyurethane Foam (SPF) Insulation	Approved 11/27/2018

### **V.5.2 Energy Audit Procedures**

#### ***Audit Procedures and Dates Most Recently Approved by DOE***

Audit Procedure: Single-Family

Audit Name: Other (specify) 12/5/2016 Hancock Software

Approval Date: 8/24/2022 DOE approved HEAT v1.0.1(G015-SP8)

Audit Procedure: Manufactured Housing

Audit Name: Other (specify) May 22, 2017 Hancock Software

Approval Date: 8/24/2022 DOE approved HEAT v1.0.1(G015-SP8)

Audit Procedure: Multi-Family

Audit Name: Other (specify) TREAT

Approval Date: MaineHousing is currently applying for TREAT

#### ***Comments***

ECOS Audit Tool: Grantee will be transitioning to ECOS effective April 1, 2025, if approved by DOE. Grantee transition plan to ECOS is as follows:

- Submission of ECOS for DOE Approval: Grantee will submit the complete application, supporting amendments, and user manual by close of business on March 14, 2025.
- Testing and Validation: ECOS is currently undergoing review by SMS to confirm that its calculations align with DOE-approved energy modeling methodologies.
- Training and Implementation: in March, field staff, including energy auditors and program administrators, are being trained on ECOS to facilitate a smooth transition.
- Final Approval and Full Adoption: Once DOE grants formal approval, ECOS will be the exclusive audit tool for SF and MH.

This transition ensures compliance with DOE guidelines. The Grantee will continue to report on the approval status and implementation progress in quarterly updates to DOE.

Multifamily Production: At this time, the Grantee does not have approval to conduct energy audits for multifamily (MF) projects. However, the Grantee is actively working through the approval process for multifamily energy auditing tools and procedures. Specifically, the Grantee is pursuing approval for the TREAT (Targeted Retrofit Energy Analysis Tool) and the LRMF (Low-Rise Multifamily) Priority List to assess and implement energy efficiency measures in MF buildings.

Once approval is obtained, the Grantee will implement MF audits following program guidelines, ensuring compliance with all necessary protocols. Energy audits will be conducted using the approved tool(s) to assess energy usage, identify cost-effective weatherization measures, and optimize energy efficiency improvements for multifamily buildings. Until the approval process is completed, the Grantee will not initiate multifamily audits but will continue preparing for implementation by developing internal processes, training staff, and aligning with state and federal requirements.

Grantee anticipates MF units will account for less than 20% of total weatherized units, therefore, each individual multifamily project will be submitted to DOE for approval before project commencement. No work will proceed without written DOE authorization.

1. Grantee's energy audits consists of the following components:
  - a. an individual audit for each dwelling unit,
  - b. energy savings calculations based on ASHRAE fundamentals, and

2. A comprehensive health and safety protocol. Prior to initiating any weatherization activities, Subgrantees are required to evaluate: the physical condition of the home, the mechanical systems, and building tightness. Evaluation of the physical condition of the home and its mechanical systems is accomplished using blower door tests, combustion efficiency analysis, ventilation assessment, fossil fuel appliance combustion safety testing, and moisture level evaluation. Results determine the necessity for various remedial actions, which must be accomplished prior to weatherization, as well as whether investing program dollars in the structure is appropriate.
3. Grantee's health and safety procedures, as described in the [Maine Weatherization Standards](#) require a total assessment of the home. Briefly, and not all inclusive, the auditor is required to assess the home from basement to attic using HEAT Enterprise:
  - a. list possible pollutant sources;
  - b. record any observable pollutant indicators;
  - c. interview the client as to health problems and lifestyle;
  - d. test all combustion appliances to the degree allowed by law as to efficiency and safe operation;
  - e. perform zone pressure diagnostic testing if applicable;
  - f. determine combustion air requirements and assess the adequacy of the existing combustion air supply;
  - g. test for spillage, back-drafting, and venting capability of all combustion exhaust vents; and
  - h. check CO production of all combustion appliances.
    - Homes that fail combustion safety tests must be deferred until corrective action is taken. Homes with unvented fossil fuel heaters cannot be weatherized until such heaters are removed, except when ANSI approved and used as secondary heat only. In addition, no weatherization activity that will affect the drying capability of the home may be undertaken until all necessary moisture control activities have been completed. After the weatherization measures are completed, the home must be checked again to ascertain that all combustion appliances are operating safely. If homes fail to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. Once a deferred home becomes eligible for weatherization, all energy audit diagnostics, including blower door testing and combustion safety testing, must be redone to establish a new baseline for the building conditions. Documentation of all activities in the client file is required.
4. Grantee standard work specifications are embodied in the [Field Guide](#) and is posted on the Grantee's website. This measures selection system applies to all types of dwelling units and is based on instrumented audits interacted with ASHRAE 62.2–2016 based calculations for energy use, actual installation and energy costs and material lifetimes to produce a savings investment ratio (SIR)-driven work order. These calculations will be conducted using HEAT Enterprise.
5. Grantee requires Subgrantees to utilize, to the degree allowed by law, diagnostic equipment including blower doors, combustion analyzers, hygrometers, CO analyzers, digital manometers and infrared cameras. Mandated tests include blower door tests, combustion efficiency analysis, minimal ventilation assessment, fossil fuel appliance CO testing, and moisture level evaluation.
6. Grantee's HEAT Enterprise uses the basic heat loss equation for conductive heat loss, (BTU/hr times area times degrees Fahrenheit over "R") taken from the ASHRAE 62.2–2016 Fundamentals Handbook, for pre and post weatherization energy use. Included in the calculations are heating degree-day correction factors and a blower door "N" factor when necessary. The results are checked against actual consumption whenever possible (HEAP vendors are required to provide consumption data; clients are asked to provide fuel bills during the audit). As the database grows, any necessary adjustments to correction factors will be made. Grantee's energy audit calculates SIRs for each contemplated weatherization measure, which reflect local heating degree-day figures and a heating degree-day correction factor.
7. In HEAT Enterprise, material lifetimes were updated based on DOE input and are the most conservative generally accepted by the industry. Installation costs are established by using actual subcontractor and supplier bids as well as crew installation costs at each Subgrantee.
8. A SIR is calculated for each contemplated energy conservation measure (ECM). Measures are arranged in descending order of payback by HEAT Enterprise with any individual measure with a SIR of less than 1 being considered "unallowable" unless paid for with another funding source (non-DOE). It is possible for the Subgrantee to elect to do fewer measures than proposed on any given job as long as measures are accomplished in the order established by HEAT Enterprise.



9. Projected incidental repair costs are also calculated and added to the total cost. Incidental repair costs are capped at 15 percent of the total cost of weatherization tasks being completed (conductive + air infiltration + mechanical tasks) in a contract period. Overall calculated SIR for activities excluding health and safety must be equal to or greater than 1. Grantee's audit system assigns an energy savings to air infiltration reduction as determined by reduction of the CFM50 figure from blower door testing. As there is no way to accurately predict a post weatherization CFM50 figure, Grantee may waive the SIR requirement for the aggregate of air infiltration reduction measures on a case-by-case basis if the overall payback requirement is not met by the post blower door test.
10. All weatherization work is performed in accordance to DOE approved energy audit procedures and 10 CFR 440 Appendix A. Supplemental DOE Approval for Spray Foam as an Air Sealing (Infiltration) Material as well as Insulation Material approved November 27, 2018

### **V.5.3 Final Inspection**

Every DOE WAP unit reported as a completed unit receives a final inspection by the Subgrantee's BPI certified Quality Control Inspector (QCI), to ensure that all work meets the minimum standard work specifications as outlined in the National Renewable Energy Laboratory (NREL) Single-Family Quality Control Inspector Job Task Analysis. The QCI must complete and provide an Inspection Completion Form to Grantee for every completed unit, certifying that the weatherization materials and measures were properly installed in accordance with the Grantee WAP standards.

Grantee conducts desk reviews on up to 100 percent of completed jobs, based on Subgrantee performance. Grantee will only authorize payment to the Subgrantee when satisfied that all work is completed in accordance with the work quality requirements outlined in WPN 22-4, Section 1. The Subgrantee is notified of any job not in compliance and is required to take the steps necessary to complete the job. In addition, the Grantee will perform quality assurance inspection reviews of at least 5 percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.

Subgrantee Agreements outline disciplinary action for inadequate inspection practices, as well as other duties not performed in accordance with expectations contained in the Agreement. *To wit:* Grantee shall notify the Subgrantee of the respects in which the Subgrantee's performance is deficient and the time period Subgrantee has to conform its performance. In the event the Subgrantee fails to correct deficiencies in its performance within the specified time, Grantee may withhold Subgrantee's funding under the Agreement until Subgrantee is in compliance.

If a Subgrantee weatherizes a project that is financed/owned by the Subgrantee, or sufficient reserves are in place for the project to incur these costs, without prior approved clearance, the Grantee has the right to refuse to reimburse for weatherization costs incurred.

Maine Weatherization Standards, Subgrantee Agreements, and Grantee's Weatherization Assistance Program Guidance and Procedures (Section 6), provide policies and procedures that govern the inspection process.

### **V.6 Weatherization Analysis of Effectiveness**

HEAT Enterprise system reports are used as tools by the Grantee to monitor Subgrantee WAP production. Additionally, the HEAT Enterprise system calculates an Energy Savings Report for each job that includes pre-R, post-R as well as annual and lifetime BTU savings for the dwelling. Grantee plans to implement the following procedures to analyze the effectiveness of weatherization projects:

1. Grantee reviews estimated energy savings calculations and reports produced by HEAT Enterprise, which also prioritizes all activities in all types of housing addressed by WAP.
2. Grantee surveys recipients of weatherization services and shares results with Subgrantees performing the work.
3. Grantee's Energy and Housing Services team (EHS) communicates regularly with Subgrantee weatherization technicians through telephone, email and onsite visits.
4. Grantee's EHS staff participates in monthly Housing Council meetings and Building Technician Committee (BTC) meetings hosted and attended by Subgrantees directors, managers and technical staff. These meetings provide a platform to receive and solicit feedback from Subgrantees regarding technical concerns, training and other areas that may need improvement. Grantee will implement training based on need.

Grantee conducts up to 100 percent desk review of all jobs and provides timely feedback to Subgrantees. Grantee's State Monitor Technical Review Checklist and State Monitor Compliance Review Checklist classifies common or problematic areas of work identified during desk audits of each weatherized unit. This checklist

includes specific areas of the building model, which prompts the monitor to require that the audit be restated if housing characteristics were not accurately entered into the initial audit. Grantee maintains a database which tracks jobs that have issues, follows-up with the Subgrantee, and documents resolutions.

The desk review process will flag any units that need additional monitoring in the form of a unit inspection. Any uncharacteristic testing numbers, costs, or unusual circumstances and measures will trigger this inspection. These inspections will be considered part of the required Quality Control Inspections. When findings or concerns are found on these inspections, the state monitor will work with the Subgrantee to help them understand how the issue occurred, how to prevent it and provide any additional training as needed.

## **V.7 Health and Safety**

Purpose and scope. The primary goals for Grantee WAP are to implement cost effective weatherization procedures to conserve energy and to assess and correct related health and safety hazards. Materials used for the abatement of such hazards not listed in Appendix A of 10 CFR 440 must meet all standards incorporated by reference and made a part of 10 CFR 440.

1. Subgrantees will be allowed to expend program funds for the abatement of energy related health and safety hazards up to an average of \$1,200 per unit. Grantee health and safety related costs will be charged to either the administrative or training and technical assistance cost category. It is the responsibility of Subgrantees to manage the health and safety expenditure report as part of the billing process. The health and safety costs excluded from the cost effective calculations are tracked separately.  
The cost of eliminating health and safety hazards, which is necessary before or because of installation of weatherization materials, is an allowable expense. Definitions of “minor” or allowable Health & Safety related repairs, and at what point repairs are considered beyond the scope of weatherization are included in the applicable sections of Grantee’s 2025 Health and Safety Plan Template, (4.0, 7.6, 7.9, 7.14, 7.16), and are aligned with the Maine Weatherization Standards.  
Grantee WAP has set parameters by defining allowable minor repairs versus unallowable major repairs for potentially out-of-scope repairs such as roof, structure, moisture, electrical, and worker/client safety. This has greatly reduced the call for case-by-case considerations. However, rigors will be applied to any case-by-case consideration, including cost, Health and Safety risk, SIRs, pursuit of non-WAP resources, and the extent of benefits to especially vulnerable low-income households and individuals per 10 CFR 440.
2. Subgrantees are encouraged to leverage other funds whenever possible when addressing non-cost effective tested items. Problems with the dwelling unit that have no connection with weatherization activities can only be addressed with other funding sources, such as Grantee’s *Lead Hazard Reduction Demonstration Grant*, or its *Home Repair Program*. Potential funding sources include, but are not limited to:
  - a. Central Heating Improvement Program (CHIP)
  - b. Community Development Block Grant (CDBG)
  - c. Maine State Housing Authority programs
  - d. City or Town assistance
  - e. USDA Rural Economic Development (formerly FHA)
  - f. Housing and Urban Development (HUD)
  - g. Local church and community groups
  - h. Building Materials Bank
  - i. Habitat for Humanity
  - j. Donations from local businesses
  - k. Landlords

Intake Procedures. Per the Maine Weatherization Standards, the auditor's duties include an evaluation of available information starting with viewing the client application, interviewing the client, and assessing the dwelling. A series of tests as outlined in the Maine Weatherization Standards and the Field Guides are performed in order to identify potential health and safety hazards as well as energy conservation opportunities. The clients sign a WAP Consent Form that specifies, “In consideration of any WAP services received, I have received a copy of the EPA publication The Lead-Safe Certified Guide to Renovate Right and have also been educated on weatherization and health and safety topics pertinent to my home.”

Client Education and Training. As outlined in WPN 22-7, the auditor makes the client aware of potential hazards

and provides them with appropriate instructions and educational materials. The client also receives guidance and information on energy conservation tips, both verbally and through educational materials relating to the subject(s). In addition to various brochures and manuals available to clients, education is provided as the home is being weatherized. Crews, contractors, inspectors and other qualified personnel explain various related concepts as the work progresses. Clients are encouraged to contact appropriate Subgrantee after weatherization if they have any questions, concerns, or wish to report feedback on the conservation efforts.

**Deferral of Services Policy:** See Grantee's Weatherization Assistance Program Guidance, Section 6(J) for Maine's *Deferral of Weatherization Services Policy*.

**Grantee Health and Safety Program:** Grantee health and safety related costs will be charged to either the administrative or training and technical assistance cost category. Grantee will follow all Occupational Safety and Health Administration (OSHA) safety regulations, and national, state and local codes as further described under the Subgrantee/Contractor Safety section below.

**Subgrantee/Contractor Safety:** Subgrantees must comply with OSHA requirements in all weatherization activities. When contractors are employed by Subgrantees, those contractors are expected to comply with OSHA requirements as well. The contractors' costs to comply with OSHA, as applicable, are part of their bid price. Related costs for Subgrantees to comply with OSHA requirements may be charged under section 440.18 as health and safety, tools and equipment, incidental repairs, etc.

1. Grantee WAP expects the crews, contractors, and other field personnel to be able to work under conditions that do not jeopardize their own health and safety.
2. Weatherization personnel shall be properly trained in workplace safety and will be provided with necessary protective equipment by their employer. All weatherization workers must comply with EPA's Renovation, Repair and Painting Rule (RRP) and at least one (1) person on each weatherization crew (includes both subcontractor crews and Subgrantee direct hires) must be trained in Renovation, Repair and Painting (RRP).
3. Subgrantees and contractors are expected to follow the requirements of Construction Industry OSHA Safety and Health Standards (29 CFR 1926/1910).
4. Subgrantees must comply with the OSHA Hazard Communication "Right to Know Program." The program requires chemical manufacturers or importers to assess the hazards of chemicals that they produce or import. It also requires that all employers provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training. Subgrantees must follow the record keeping requirements for Occupational Injuries and Illnesses.
5. Subgrantees are responsible for maintaining vehicles purchased with federal funds so that they are in safe and proper operating condition.
6. Subgrantees are responsible for ensuring all work performed in client homes abides by federal, state, and local codes and regulations.
7. Grantee verifies contractor and Subgrantee compliance with OSHA 10, Safety Data Sheets (SDS), and RRP requirements as follows:
  - a. As part of the annual bid process, contractors are required to submit RRP certifications. Grantee reviews this documentation to ensure compliance.
  - b. Grantee conducts in-progress monitoring inspections to verify compliance with OSHA 1910 and 1926, RRP, and reviews/compares SDS information to actual products being installed.
  - c. Grantee conducts client interviews to confirm that they received SDS information prior to the installation of WAP measures.

**Client Health and Safety.** Client health and safety is a priority for Grantee WAP. Through DOE trainings, related trainings at Maine Safety Works, and field training, Grantee has developed a comprehensive plan to ensure safety in energy related areas. Subgrantees are required to have the proper equipment to perform the necessary weatherization tests. Subgrantee personnel are required to attend trainings as determined necessary. Homes constructed prior to 1978 are presumed to contain lead paint. All weatherization clients residing in homes constructed prior to 1978 will receive the EPA publication The Lead-Safe Certified Guide to Renovate Right prior to the commencement of any weatherization activities.

1. Maine's Community Action Agency Building Technology Committee (BTC) meets on a monthly basis to discuss all technical aspects of the weatherization program. The committee consists of a technical representative from each Subgrantee. Through this venue, Subgrantees are continually updated with information and techniques regarding energy conservation and health and safety issues. This system ensures

that all Subgrantees are receiving the same information and creates consistency for a quality program statewide.

2. The Weatherization and CHIP programs work in unison to guarantee "A House as a System" approach when conducting an audit.
3. All Subgrantees have blower doors, digital manometers, CO testers, heating system efficiency testers, and hygrometers, as well as other test equipment. All weatherization personnel are required to be trained in energy related health and safety issues and indoor air quality problems. Testing and corrective procedures requiring special licensing on a state level will be referred to the appropriate authority.

Health and Safety Guidance Grantee uses the Table of Issues (adopted in DOE WPN 22-7) as a reference of a majority of conditions that Grantee regards as hazardous. In all cases these conditions will determine the course that weatherization will take. The chart outlines the hazard, the importance of correction, if postponement of weatherization services is necessary, types of testing, and corrective procedures for each hazard. In addition to the prescribed guidance in the Table of Issues, the following will be assessed and addressed, as applicable:

1. Air Conditioning and Heating Systems. Because of Maine's high heating degree-day environment, cooling needs are considered insignificant for Maine dwellings. Therefore, Maine climate conditions do not warrant defining at-risk occupants or the repair or replacement of air conditioning systems under DOE WAP.
2. Asbestos. According to the EPA's Building Air Quality Guide, the mere presence of asbestos in a building does not mean that the health of a building occupant is endangered. Asbestos-containing material in good condition, not damaged or disturbed, is not likely to release asbestos into the air.
3. Combustion Appliances and Combustion Gases. Grantee recognizes that combustion gases in homes pose the most serious hazard. As a result, Grantee has adopted a comprehensive plan to ensure safe operation of combustion appliances and to make sure that weatherization procedures do not contribute to a problem.
4. Per the SWS, (2.02 Combustion Safety) CO in the appliance vent, ambient CO and spillage testing must occur as part of a weatherization job. If the mandatory testing results are outside of the allowable limits, a clean, tune & evaluate (CTE) of the heating system must occur as part of a weatherization job.
5. Energy auditors must comply with the rules of the Maine Fuel Board: Prior to performing a combustion safety and efficiency test, a limited energy auditor technician shall obtain the manufacturer's installation and operating instructions for the specific equipment to be tested. Energy auditors must make every effort to obtain an equipment manual on site or online. When a manual is not obtainable, the energy auditor must order a CTE by a licensed Heating Technician. This CTE must be performed prior to invoicing the job. A visual inspection, CAZ pressure test, spillage test, and ambient CO measurement must still be conducted as part of the energy audit.
6. In addition, CTEs should also be conducted as part of routine maintenance and safety practices. Subgrantees must provide in their Work Plan established internal policies that describe how CTEs will be addressed for clients of the weatherization program. Of all the by-products of fuel combustion, carbon monoxide (CO) is deadly. Grantee views any ambient level of CO as potentially dangerous and will be considered a warning signal that a problem exists. Corrective procedures requiring special licensing will be referred to the appropriate authority. Grantee follows guidance provided in the ASHRAE standards.
7. Mold and Moisture. A thorough moisture assessment of the home is done during the audit process and conditions are noted in HEAT Enterprise. The assessment process includes a client interview, visual inspection, measuring humidity levels and blower door testing. Corrective procedures include client education, eliminating/reducing source of moisture, and providing mechanical ventilation as prescribed by ASHRAE standards.
8. Occupant Pre-existing or Potential Health Conditions. Agencies will provide an "Occupant Pre-Existing or Potential Health Conditions" form to the client which explains that some weatherization measures create dust, smells, or other conditions that may aggravate certain health conditions in some individuals. The client will then have the opportunity to self-identify any pre-existing or potential health concerns that may be aggravated by weatherization services.
9. Diagnostic equipment, such as blower doors, will not be used on units where such equipment could exacerbate existing problems (e.g., vermiculite in open floored attics).

10. Spray Polyurethane. Grantee must follow EPA recommendations (available online at <http://www.epa.gov/saferchoice/ventilation-guidance-promote-safe-use-spray-polyurethane-foam-spf-insulation-incluyendo>).

## **V.8 Program Management**

### **V.8.1 Overview and Organization**

Organization Overview. The Maine State Housing Authority (MaineHousing), created in 1969 by the state legislature, is Maine's housing finance agency. MaineHousing is a quasi-state agency with a Board of Commissioners appointed by the Governor and confirmed by the Legislature. MaineHousing administers the DOE Weatherization Assistance Program. MaineHousing's mission statement reads, "The mission of MaineHousing is to assist Maine people to obtain and maintain decent, safe, affordable housing and services suitable to their unique housing needs." In carrying out this mission, MaineHousing provides leadership, maximizes resources, and promotes partnerships to develop and implement sound housing policy.

Since its inception, MaineHousing has provided housing for low and very low-income renters and the opportunity for low and moderate-income Maine families to purchase their own homes. In the more recent past, MaineHousing has expanded its programs to meet new challenges posed by various housing needs: people who are homeless; people with special housing needs (such as mental health consumers); older adults; low income homeowners who cannot afford basic home repairs; and others.

The State of Maine developed the nation's first Weatherization Program in 1973 in response to the energy crisis that gripped the northeast and caused economic hardship across the country. Maine WAP became the model used in developing funding for a program in every state in the nation. The program was originally administered by the Division of Community Services, an executive department agency. It was re-assigned to MaineHousing in 1991.

By its nature, MaineHousing rarely serves its customers directly. It places a heavy reliance on its partners to deliver its programs and services to the households that it serves. These partners include real estate professionals and lenders, non-profit organizations, other government agencies (in particular, Maine Department of Economic and Community Development, and Health and Human Services) municipalities, for-profit corporations, private developers, private property owners, management corporations, and Community Action Agencies. With offices located throughout Maine, eight (8) of Maine's Community Action Agencies serve as Subgrantees for the DOE Weatherization and Low Income Home Energy Assistance Programs (HEAP).

In addition to WAP, MaineHousing serves as Grantee for HEAP, Central Heating Improvement Program and other home repair programs. Weatherization serves as MaineHousing's cornerstone to providing thousands of Maine homeowners and renters with funds to repair and improve their homes. CDBG and other state and federal sources of funds will be used in conjunction with WAP funds to address this home repair crisis. In addition, MaineHousing consistently designates up to 15 percent of its HEAP grant to weatherization and heating system repair programs.

Review of Subgrantee Work Plans, Budgets, and Reported Results - Grantee requires Subgrantees to provide a Work Plan and Budget for the 2025 DOE program as part of the Subgrantee Agreement. Grantee will review the Work Plan and Budget and request any updates, if necessary, for the program year. No funds will be advanced to Subgrantees until the Work Plan and Budget is reviewed and approved by Grantee. Grantee's EHS staff will perform comparisons of Subgrantees monthly billings versus their approved budgets to identify financial or compliance variances. EHS staff will work with Subgrantees to correct/understand variances as they are identified during this process.

Allocation of Funding to Subgrantees - Grantee will allocate program funding to Subgrantees based on the percentage of HEAP applications approved. Grantee reserves the right to re-allocate funding among Subgrantees during the program year based on program performance and need statewide.

### **Competitive Process for Subgrantees**

Grantee intends to conduct a competitive process to attract new Subgrantees to provide DOE WAP services. The Grantee will ensure that each Subgrantee is selected on the basis of public comment received during a public hearing conducted pursuant to 440.14(a). Grantee will consider:

- a. The Subgrantee's experience and performance in weatherization or housing renovation activities;
- b. The Subgrantee's experience in assisting low-income persons in the area to be served; and
- c. The Subgrantee's capacity to undertake a timely and effective weatherization program.

Preference will be given to a Subgrantee who is currently administering, an effective program. Program effectiveness is evaluated by consideration of factors including, but not necessarily limited to the following:

- a. The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
- b. The quality of work performed by the Subgrantee;
- c. The number, qualifications, and experience of the staff members of the Subgrantee; and
- d. The ability of the Subgrantee to secure volunteers, training participants, public service employment workers, and other federal or state training programs.

### **V.8.2 Administrative Expenditure Limits**

Pursuant to 10 CFR 440.18(e) Grantee will not allow more than 7.5% of the DOE allocation to be available to Subgrantees for administrative purposes, unless Subgrantees meets the below criteria for an additional 5%. Subgrantees will be required to provide budgets reflecting actual administrative costs, and allocations will be made in accordance with those budgets.

Grantee WAP may allow up to an additional five percent administrative funding for Subgrantees that qualify based on the following criteria:

1. As required by federal regulations, the Subgrantees must receive less than \$350,000 for their total annual sub-granted amount.
2. Subgrantee budgets must reflect reasonably expected administrative costs for the new grant period, which are in excess of the five percent. These expected costs should be based on the best information currently available.
3. The Subgrantees must have no uncorrected audit or monitoring findings regarding the allocation of costs to the DOE sub-grant for the most current period available.

Any Subgrantee meeting criteria defined in 10 CFR 440.18(d) may receive increased administrative funding, not to exceed an additional five percent (20 percent total), based on actual costs incurred. The Grantee will require the Subgrantees to submit a letter of application for additional administrative funding. This letter must address the impact on production and the need for the additional administrative funds as well as the three (3) criteria shown above.

### **V.8.3 Monitoring Activities**

Programmatic/Subgrantee Monitoring. The monitoring approach under the Grantee WAP is to work closely with Subgrantee personnel to ensure continued quality workmanship and to ensure adequate financial systems and procedures. Grantee WAP will administer Quality Control Inspections (QCI) in accordance with SWS outlined in the Field Guides and 10 CFR 440 using both the independent QCI and independent auditor/QCI. This will enable Subgrantees with fewer staff to utilize the process. In all cases QCIs will be Subgrantee employees or hired contractors and the Grantee will perform quality assurance reviews of at least 5 percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.

Comprehensive coverage of all Subgrantee WAP activities is achieved by a combination of regularly scheduled Grantee efforts:

1. Administrative and
2. Fiscal monitoring – annually.
3. Onsite inspection of in process and completed units – ongoing.
4. Client file review (Compliance & Technical) – monthly.
5. Subgrantee monitoring – annually.
6. Review of Subgrantee work plans, budgets, and reported results – ongoing.
7. Review of independent Subgrantee annual audits – annually.

Grantee has developed its own monitoring tool that includes reviews of the Subgrantee Uniform Grant Guidance Audit prescribed by 2 CFR 200. Among other things, Grantee has determined that the DOE monitoring tool duplicates many financial and compliance audit requirements under 2 CFR 200 which all Subgrantees must have



their independent auditors perform annually. Subgrantees are required to submit their annual independent audit (Single-Audit) report to Grantee as soon as the report is available.

Subgrantee Monitoring: On site monitoring will consist of administrative, programmatic and technical components. All eight of our Subgrantees will have at a minimum one on site monitoring on an annual basis.

1. Annual Subgrantee Administrative Monitoring Review

- a. Priority & Wait List
- b. Reweatherization
- c. Deferrals
- d. Contractors & Procurement
- e. Required Documents
- f. Energy Audits
- g. Field Notes
- h. Licensing & Certifications
- i. HEAT Audits
- j. Photo Documentation
- k. Equipment Compliance

2. Each comprehensive monitoring visit will include an exit interview during which the WAP Program Officer/Specialist apprises Subgrantee personnel of any findings, recommended improvements, and best practices as applicable. Within 30 days of the Subgrantee Monitoring visit, the WAP Program Officer/Specialist will prepare and deliver a report to the Subgrantee summarizing any findings and requesting corrective actions. The WAP Program Officer/Specialist will perform a follow-up review of any corrective action plans within six months of the monitoring visit.
3. If significant issues are identified, Grantee requires the Subgrantee to submit a corrective action plan for Grantee's review/approval. Grantee will conduct a six (6) month follow-up review to ensure the plan was executed and effective in addressing the issues.
4. If Grantee is not able to conduct onsite administrative and/or programmatic monitoring remote desk monitoring will be performed. The same monitoring tools and criteria will be used as much as possible utilizing online software for individual meetings/interviews and information submissions to MaineHousing via Sharefile to obtain the same outcome as a physical onsite.

Financial Monitoring. Grantee staff will perform comprehensive fiscal monitoring of each Subgrantee on an annual basis using the Compliance Review Administrative Monitoring Tool. During the annual fiscal audit, Grantee conducts a 10 percent file review of Subgrantee's production. If a significant issue is cited, Grantee will expand the sample size.

The EHS Fiscal Compliance Specialist addresses the following areas of performance under DOE Weatherization:

1. Annual Financial Monitoring review

- a. Financial/Fiscal Accountability
- b. Uniform Grant Guidance Audit prescribed by 2 CFR 200
- c. General ledger
- d. Payroll/Personnel/Timecards
- e. Vehicles and equipment purchases
- f. Indirect rate review to make sure it is being calculated correctly
- g. Invoicing
- h. Corrective action plans
- i. Contractor payments

2. Each comprehensive monitoring visit includes an exit interview in person meeting, or written communication, during which the EHS Fiscal Compliance Specialist apprises Subgrantee personnel of pertinent findings and recommended improvements, as applicable. Within 30 days of the

administrative/fiscal monitoring visit, the EHS Fiscal Compliance Specialist will prepare and deliver a report to the Subgrantee summarizing these findings and requesting corrective actions.

Additionally, the Fiscal Compliance Specialist will perform a six (6) month follow-up review of corrective action plans, if applicable.

3. If significant issues are identified, Grantee requires the Subgrantee to submit a corrective action plan for Grantee's review/approval. Grantee will conduct a six (6) month follow-up review to ensure the plan was executed and effective in addressing the issues.
4. If Grantee is not able to perform fiscal monitoring onsite for numerous reasons all needed data for review will be sent to Grantee and a comprehensive desk review will be completed.

**Grantee Monitoring Personnel:**

TITLE/GROUP CATEGORY	HRS /YR	TIME %	ADMIN %	T&TA %	DESCRIPTION OF DUTIES
Fiscal Compliance Specialist	624	30.00%	25.00%	5.00%	Performs fiscal reviews of Subgrantees to ensure fiscal compliance to federal rules and regulations; provides Programmatic Guidance to Sub-Grantees.
Technical Services Specialists #1	1,456	70.00%	50.00%	20.00%	Primary responsibility for field inspections and monitoring of completed weatherized units to ensure quality and compliance with program regulations. Assists in technical training, such as conducting energy audits, contractor relations, including contractor bids
Technical Services Specialists #2	1,456	70.00%	50.00%	20.00%	Primary responsibility for field inspections and monitoring of completed weatherized units to ensure quality and compliance with program regulations. Assists in technical training, such as conducting energy audits, contractor relations, including contractor bids
WAP Program Specialist #1					Performs compliance desk review of completed jobs and onsite Grantee Programmatic compliance monitoring. Provide Subgrantee training to address administrative requirements, compliance issues, Heat Enterprise, and other areas as needed and/or requested by Subgrantee. Provides Programmatic Guidance to WAP Subgrantee
WAP Program Officers #1	874	42.00%	32.00%	10.00%	Performs compliance desk review of completed jobs and onsite Grantee Programmatic compliance monitoring. Provide Subgrantee training to address administrative requirements, compliance issues, Heat Enterprise, and other areas as needed and/or requested by Subgrantee. Provides Programmatic Guidance to WAP Subgrantee



WAP Program Officers #2	1,206	58.00%	33.00%	25.00%	Performs compliance desk review of completed jobs and onsite Grantee Programmatic compliance monitoring. Provide Subgrantee training to address administrative requirements, compliance issues, Heat Enterprise, and other areas as needed and/or requested by Subgrantee. Provides Programmatic Guidance to WAP Subgrantee
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**Independent QCI Monitoring:** QCI monitoring has three components: Desk Review, Unit Inspections, and On-site Subgrantee Monitoring Visits.

1. Grantee State Monitors conduct a minimum of 10 percent and up to 100 percent desk/file review of the completed units submitted by each Subgrantee. The percentage of desk review depends on Subgrantees' performance, which is captured on Grantee's internal tracking sheet. This practice allows the Grantee to monitor best practices, identify concerns, and select/prioritize units for onsite inspections for each Subgrantee. *State Monitor Desk Review Checklists* provide Subgrantee with the desk review results for jobs reviewed, including job deficiencies. Deficiencies are tracked by number and level of concern of reviewed jobs on Grantee's internal tracking sheet. *State Monitor Review Checklists* are made available to the Subgrantee in HEAT Enterprise. Any deficiencies identified on the checklists must be addressed in the job file before payment can be issued.
2. EHS Technical Service Specialists will perform onsite unit inspections of completed and in-progress units statewide on an ongoing basis. They will inspect a minimum of five percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.
3. If significant issues are identified, the Technical Services Specialists will expand the percentage of inspected units. Technical Guides and Materials (V.5.1) establishes the criteria for inspection procedures.
4. Capture and reporting of inspection data will be accomplished using the Maine WAP QCI Field Form, which provides a comprehensive checklist that includes:
  - a. Assessment of auditors' pre-existing R-values and accurate building model
  - b. Evaluation of auditors' approach for each distinct area of the structure, attic, walls, basement, site specifics, etc.
  - c. Verification and evaluation of each installed measure
  - d. Combustion appliance inspection and combustion safety testing data
  - e. Blower door, pressure pan and other applicable building diagnostics data
  - f. Exhaust device cfm measurement and confirmation of correct ASHRAE ventilation requirement
  - g. Confirmation of on-site documentation required by SWS such as Insulation Certificates
  - h. Client comments, concerns and positive remarks
5. Within 30 days of the site inspection, the Grantee monitor submits a Unit Inspection Report to the Subgrantee. These reports include findings and any required corrective actions, communications with the client/owner and contractor, observations and an assessment of the auditor's performance. If a rework is ordered, the Subgrantee will have 30 days to complete the rework and notify EHS, in writing, of its completion. The Subgrantee may also contact the Manager of Weatherization in writing during this 30-day period to appeal a rework finding. The unit will be revisited by the Manager of Weatherization, a representative of the Maine Community Action Agency Housing Council, the Grantee monitor, and a Subgrantee representative to resolve the dispute through actual onsite observations and discussion of discrepancies.
  - a. If the rework ordered is not rescinded following this appeal process, the Subgrantee will have 30 days from the date of the appeal resolution to complete the rework.
  - b. If reworks are not completed within 30 days, and the Subgrantee has not demonstrated reasonable cause for delay, a billing adjustment will be made for the entire dwelling unit. The unit will not be reinstated until the rework has been completed.

- c. If there are significant deficiencies identified, the Grantee monitor will increase the number of units reviewed and frequency of monitoring visits to the Subgrantee until there are assurances that all deficiencies have been resolved.
6. Subgrantees are required to submit corrective action plans when there are indications that the Subgrantee has significant compliance issues.
7. EHS Technical Service Specialists conduct multi-day focused technical monitoring at each Subgrantee office on an annual basis. This includes face-to-face meetings and interviews with Subgrantee weatherization managers, field staff and contractors to evaluate processes and training needs. A written summary of the site visit is provided to the Subgrantee within 30 days. The Subgrantee must respond to any requests, concerns or findings within 30 days.

**Independent Subgrantee Audit:** Each Subgrantee will have an audit of their financial statements and a Uniform Grant Guidance Audit prescribed by 2 CFR 200 compliance audit conducted by an independent CPA firm following the close of the Subgrantee fiscal year. These audits will comply with all regulations pertaining to DOE WAP and will be made available to Grantee management. Grantee's Fiscal Compliance Specialist evaluates/reviews the results of these audits on an annual basis.

Subgrantee must provide written assurance that corrective action has been taken or present a plan to correct any noted deficiencies within 60 days. During and following this 60-day corrective action period, Grantee staff will offer and be available for training and technical assistance as needed by the Subgrantee.

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

With the addition of BIL Weatherization funds added to the program, production has increased therefore driving the need for additional staffing capacity as well as subcontractors. Subgrantees have expressed the need to create an inclusive onboarding curriculum. In addition, the cost and associated time to onboard new staff has become an identified need.

Given the ramp up period prior to the deployment of the BIL funds, the subgrantees also have existing staff needs in terms of professional development. The employment market attracted candidates from various backgrounds. The need for soft skill professional development is prevalent.

In addition to Grantee and Subgrantee staffing, the Grantee has partnered with Maine Building Performance Association (BPA) on a Workforce Development Project. BPA recently conducted an in-depth needs assessment survey and are currently analyzing the data. BPA will also work on creating pathways to bring people, schools, and contractors together; integrate a feeder system into statewide energy specialists, pre-apprenticeship, apprenticeship, and internship programs; provide outreach and bring attention to historically underrepresented communities. The Grantee will also conduct outreach via community events such as trade and home shows.

The Grantee has also partnered with the Governor's Energy office and Efficiency Maine Trust. This collaboration will open up additional referral streams for potential program recipients as well as contractor and vendor resources. This partnership will not only enhance the production but will provide program recipients with additional resources to help reduce their energy burden and increase efficiency.

Grantee will continue to support Subgrantees by providing training opportunities for crews and contractors, as well as providing guidance regarding the allowable use of DOE Training and Technical Assistance (T&TA) funds for training weatherization contractors, as well as Subgrantee technicians and weatherization crews. Subgrantees are encouraged to renew their certified employees certifications and licenses six months prior to expiration. These certifications include, but are not limited to, HEP Energy Auditor, HEP Quality Control Inspector, BPI Building Analyst, as well as all other occupational specialties requiring certification. All Subgrantees and contractors are required to have all state and local licenses as required by the state of Maine.

Grantee's WAP T&TA plan provides a variety of activities to support developing and enhancing skills of personnel at the Grantee, Subgrantee and contractor levels. The desired result of all T&TA activities is to maximize energy savings, ensure health and safety of clients and WAP personnel, minimize operating costs, improve management and administrative procedures, and prevent waste, fraud and abuse. New WAP staff who do not possess all required training and certifications will receive necessary training as soon as possible and no later than 6 months from their date of hire. WAP staffs work under supervision as needed until they have received required training and certifications.

The T&TA plan incorporates results and information made available through EHS field monitoring visits and input from Subgrantees, weatherization contractors, WPNs, DOE monitoring visits, internal state audits, IG reports and/or ACSI reports. All Comprehensive Training will be conducted by Interstate Renewable Energy Council (IREC) accredited training organizations. Specific trainings will be administered by qualified personnel as needed. The percentage of comprehensive and specific trainings will be roughly thirty and seventy percent respectfully. A comprehensive breakdown of training activities are found on the T&TA Template submitted as an attachment to this document.

Grantee/Subgrantee Training. Grantee supports the professional development and training needs of Grantee and Subgrantee weatherization staff and contractors. Subgrantees are provided T&TA funds that allow them flexibility in meeting training needs for their WAP staffs and contractors.

1. *BPI (HEP) Comprehensive Training.* Grantee will coordinate and fund mandatory accredited certifications for Grantee and Subgrantee staff as required by Weatherization Program Notices. Comprehensive training will be scheduled as current certifications are expiring or new staff/contractors are employed. Certification renewal is currently on a rolling three-year timeframe.
  - a. During the 2025 DOE plan year, Grantee anticipates coordinating and funding accredited trainings and testing for Grantee, Subgrantee technicians, Contractors, and Subgrantee Crew workers as detailed on Grantee's 2025 DOE T&TA Planning and Reporting Template.
  - b. Grantee will coordinate and fund Crew Leader (CL) and Retrofit Installer (RIT) Comprehensive Training and certification for Subgrantee crew workers and weatherization contractors as needed. Grantee makes training opportunities available annually. These Comprehensive Trainings will be provided to Grantee's weatherization network to ensure continuity and best practices across the work force for weatherization contractors and Subgrantee crews performing weatherization work. IREC accredited training will align with the NREL Job Task Analysis (JTAs) for the scope of work performed by the WAP professional.
2. *Grantee, Subgrantee and Contractor Training.* Grantee will coordinate and fund training to address the top training topics/needs identified by Subgrantees including: HEAT Enterprise software, monitoring and technical best practices, WPN guidance, and training needs identified through Grantee monitoring activities. Training topics will be addressed through Comprehensive or Specific training avenues as needed.
3. *National and Regional Conferences.* Grantee will send Grantee staff, and encourage Subgrantee technical and fiscal personnel and weatherization contractors to attend NASCSP and DOE approved training conferences, as well as other conferences relating to health and safety, air quality, energy audits and weatherization specific measures.
4. *In-House Training.* Grantee staff will provide training on-site as needed in technical and fiscal matters and to address acute deficiencies in the field such as combustion safety training, audit training, ASHRAE, etc..
5. *Online Training Modules.* Grantee continues to develop online training modules geared toward new staff orientations for Subgrantees and/or weatherization contractors, as well as modules focusing on technical, fiscal and overall program management to provide support for weatherization installation and standards on an as needed basis. These trainings are offered to the WAP network via MaineHousing's Bridge Learning Software. Training will be added to address building code compliance. This training is sponsored by the Maine Fuel Board and Maine Manufactured Housing Board at no cost and is virtual. This training is listed on the Maine T&TA Template.

All Subgrantees are required to submit a T&TA work plan with their budget for Grantee approval. These work plans will identify and address T&TA needs at Subgrantee agencies. A standard outline is provided to all Subgrantees setting forth the areas required in their work plans.

The Grantee will review the Work Plans and Budgets to determine whether the Subgrantees are complying with the outline as well as the standards stated above. The Grantee will also coordinate and provide all Subgrantees with current developments in technical procedures and DOE guidance on technical issues. Through these procedures, the Grantee will ensure consistency in the Subgrantees' procedures as well as identifying needs of individual Subgrantees. The Grantee will expend every effort, through monitoring and management activities, to ensure that Grantee continues to operate a quality WAP.

In addition, Subgrantees submit semi-annual activity reports to Grantee identifying agency staff and/or contractor employees benefiting from the use of DOE T&TA funds for training.

The Housing Director of each Subgrantee will notify the Grantee and the Housing Council of any and all planned training sessions so that common needs are coordinated and duplication is avoided.

The Grantee has initiated a working group comprised of the Manager of Weatherization and volunteer members from the subgrantees. The focus of this working group is to identify DOE allowable methods and uses for T&TA funds that are applicable to the Maine Weatherization network. Specifically, the focus of the working group is to develop a comprehensive training needs assessment. This tool will be utilized for administrative and technical staff at both the Grantee and Subgrantee level, as well as for the subcontractors performing services. The analysis from this tool as well as additional input from the subgrantees will provide data to drive the T&TA plan.

Grantee also relies heavily on information gathered during the monitoring process to determine and prioritize training needs. There will continue to be training such as EPA Certified Lead Renovator training which requires EPA certified trainers and other specialized training as it becomes available (i.e. Maine Indoor Air Quality, Building Performance Association, etc.). Grantee is notified of these external training opportunities and informs Subgrantees/contractors of them.

Grantee tracks applicable Grantee and Subgrantee credentials to ensure maintenance of these credentials.

The effectiveness of T&TA activities is gauged by:

1. review of session evaluation forms;
2. feedback from Building Technical Committee and contractor meetings;
3. comparison of pre & post training on-site results; and
4. analysis of responses to annual Subgrantee training needs surveys.

Contractor Training. Grantee requires that contractors receiving DOE T&TA funds for DOE approved training events sign a retention agreement confirming that the contractor will provide weatherization services for a period of one year from the date of training. The use of T&TA funds to reimburse contractors is limited to T&TA that supports the four Home Energy Professionals occupations (Retrofit Installer Technician, Crew Leader, Energy Auditor, Quality Control Inspector).

Client Education. Per the Maine Weatherization Standards, energy auditors and inspectors are required to provide the client/owner education during all phases of the weatherization process. This includes, but is not limited to:

1. how the weatherization process will address health and safety issues;
2. explanation of energy-conserving measures that will be installed;
3. recommendations on how the client can conserve energy; and
4. explanation of required maintenance for existing equipment, including equipment calibration requirements, added equipment, or energy-saving measures.

## **V.9 Energy Crisis and Disaster Plan**

In the event that an energy crisis or disaster plan is triggered by state or federal declarations, Grantee will ensure that use of WAP funds adhere to procedures outlined in WPN 12-7.

## **V.10 Dispute Resolution Process:**

MaineHousing, as the Grantee for the U.S. Department of Energy Weatherization Assistance Program (DOE WAP), maintains a formal Dispute Resolution Process to ensure timely and equitable resolution of issues that may arise during the administration of the program. This process covers disputes involving property owners, tenants, subcontractors, applicants, and other stakeholders associated with the delivery of WAP services.

### **Subgrantee-Level Resolution Procedures**

Subgrantees are expected to document all complaints and resolutions, and to respond to the complainant in writing within ten (10) business days of receiving a formal complaint.

### **Grantee-Level Resolution Procedures**

If the client is not satisfied with the Subgrantee's conclusion(s) or action(s) taken, he/she may request that MaineHousing review the Subgrantee's decision(s). A request for a MaineHousing review must be received by MaineHousing within 10 business days of the Subgrantee's decision(s).

### **Further Dispute Resolution Options**

If the complainant remains unsatisfied after MaineHousing's review, the following options may be available depending on the nature of the dispute:

- **Mediation:** MaineHousing may offer third-party mediation services to help reach a mutually acceptable resolution.
- **Arbitration:** In cases where contractual obligations are in dispute (e.g., subcontractor disputes), parties may pursue binding arbitration as outlined in their agreements.
- **State Appeal Process:** Applicants and tenants may seek recourse through the Maine State Housing Authority's formal grievance process or through appropriate state agencies if applicable.

All parties involved in a dispute are encouraged to follow the steps in good faith to ensure fair and timely resolution. MaineHousing is committed to upholding transparency, accountability, and equity in the administration of WAP services across the state.

A copy of MaineHousing's full Dispute Resolution Policy is attached to this application.

## **V.11 Investigating Allegations of Fraud, Waste and Abuse:**

MaineHousing has established comprehensive procedures for addressing allegations of fraud, waste, and abuse (FWA) within the administration of the U.S. Department of Energy's Weatherization Assistance Program (WAP). These procedures are designed to maintain program integrity, and protect public resources.

### **Reporting Allegations**

All employees, Subgrantees, contractors, clients, or members of the public may report suspected FWA through:

- MaineHousing uses the Maine State Auditor's Fraud Hotline ([maine.gov/audit/fraud](http://maine.gov/audit/fraud)) as its fraud tip hotline.
- Complaints can also be submitted electronically by completing the Online Fraud Form.

In addition, suspected or reported fraud may be referred to MaineHousing's Weatherization Assistance Program for review and follow-up.

All complaints will be treated with confidentiality to the extent permitted by law and policy, and complainants are protected from retaliation.

### **Initial Review and Triage**

Upon receipt of an allegation, the WAP Program Manager or their designee will:

- Acknowledge the report (unless submitted anonymously)
- Conduct a preliminary review to determine whether the allegation falls under FWA and whether an investigation is warranted
- Refer the matter to MaineHousing's Compliance or Legal Department if the allegation involves serious misconduct or criminal activity

### **Roles and Responsibilities**

- **WAP Program Manager:** Responsible for coordinating the initial review and ensuring program-level documentation and response.
- **Compliance Department:** Leads or supports investigations involving potential violations of federal regulations, internal policy, or misuse of funds.
- **Legal Department:** Advises on legal implications and determines whether referral to external agencies (e.g., Office of Inspector General) is required.
- **Subgrantees:** Required to cooperate fully with any investigation and maintain records as outlined in their contracts.

### **Investigation Procedures**

- Develop a formal investigation plan
- Collect and review relevant documents and records
- Conduct interviews with involved parties
- Document findings and determine whether a violation occurred
- If substantiated, determine appropriate corrective actions, including repayment of funds, retraining, or termination of Subgrantee agreements

## **Mandatory Disclosures**

If MaineHousing discovers any violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the WAP grant, MaineHousing will:

- Promptly disclose in writing to the DOE Contracting Officer or designated representative
- Provide relevant documentation and a summary of findings
- Cooperate fully with DOE's review or investigation

## **Reporting to DOE**

All substantiated allegations involving FWA will be formally reported to the DOE WAP Project Officer, including:

- A summary of the allegation
- Description of the investigative process
- Findings and conclusions
- Actions taken to resolve the issue and prevent recurrence

A copy of MaineHousing's full **Fraud, Waste, and Abuse Investigation Procedures** is attached to this SF-424 application.