## IV.1 Subgrantees

<table>
<thead>
<tr>
<th>Subgrantee (City)</th>
<th>Planned Funds/Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arrowhead Economic Opportunity Agency, Inc. (Virginia)</td>
<td>$4,021,867.00</td>
</tr>
<tr>
<td>Bk-County Community Action program, Inc. (Bemidji)</td>
<td>$2,142,496.00</td>
</tr>
<tr>
<td>Community Action Partnership of Ramsey &amp; Washington Counties (Saint Paul)</td>
<td>$7,414,064.00</td>
</tr>
<tr>
<td>Dakota County Community Development Agency (Eagan)</td>
<td>$2,656,844.00</td>
</tr>
<tr>
<td>Fond Du Lac Reservation Business Committee (Cloquet)</td>
<td>$162,017.00</td>
</tr>
<tr>
<td>Inter-County Community Council (Oklee)</td>
<td>$1,104,023.00</td>
</tr>
<tr>
<td>KOOTASCA Community Action, Inc. (Grand Rapids)</td>
<td>$1,123,698.00</td>
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<tr>
<td>Lakes and Pines Community Action Council, Inc. (Mora)</td>
<td>$3,168,678.00</td>
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<tr>
<td>Mahube-OTWA Community Action Partnership, Inc. (Detroit Lakes)</td>
<td>$3,687,793.00</td>
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<tr>
<td>Mille Lacs Band of Ojibwe Indians (Onamia)</td>
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<td>Minnesota Valley Action Council (Mankato)</td>
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<td>Northwest Community Action, Inc (Badger)</td>
<td>$727,208.00</td>
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<tr>
<td>Prairie Five Community Action Council, Inc. (Montevideo)</td>
<td>$782,412.00</td>
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<td>Semcac (Rushford)</td>
<td>$3,574,288.00</td>
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<tr>
<td>Southwestern Minnesota Opportunity Council, Inc. (Worthington)</td>
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<td>Sustainable Resources Center (Minneapolis)</td>
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<tr>
<td>Three Rivers Community Action, Inc. (Zumbrota)</td>
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<td>Tri-County Action Programs, Inc. (SC) (Waite Park)</td>
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<td>United Community Action Partnership (Marshall)</td>
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<td>West Central Minnesota Communities Action, Inc. (Elbow Lake)</td>
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<td>White Earth Reservation Tribal Council (Waubun)</td>
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<td>Wright County Community Action, Inc. (Maple Lake)</td>
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<td><strong>Total:</strong></td>
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4,582
IV.2 WAP Production Schedule

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<thead>
<tr>
<th>Weatherization Plans</th>
<th>Units</th>
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<tbody>
<tr>
<td>Total Units (excluding reweatherized)</td>
<td>4,582</td>
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<tr>
<td>Reweatherized Units</td>
<td>0</td>
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</table>

<table>
<thead>
<tr>
<th>Average Unit Costs, Units subject to DOE Project Rules</th>
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</thead>
<tbody>
<tr>
<td><strong>VEHICLE &amp; EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)</strong></td>
</tr>
<tr>
<td>A</td>
</tr>
<tr>
<td>B</td>
</tr>
<tr>
<td>C</td>
</tr>
<tr>
<td>D</td>
</tr>
<tr>
<td>E</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th><strong>AVERAGE COST PER DWELLING UNIT (DOE RULES)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>F</td>
</tr>
<tr>
<td>G</td>
</tr>
<tr>
<td>H</td>
</tr>
<tr>
<td>I</td>
</tr>
<tr>
<td>J</td>
</tr>
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</table>

IV.3 Energy Savings

Method used to calculate savings: ☑ WAP algorithm ☐ Other (describe below)

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<thead>
<tr>
<th>Units</th>
<th>Savings Calculator (MBtus)</th>
<th>Energy Savings</th>
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<tbody>
<tr>
<td>This Year Estimate</td>
<td>4582</td>
<td>29.3</td>
</tr>
<tr>
<td>Prior Year Estimate</td>
<td>1196</td>
<td>29.3</td>
</tr>
<tr>
<td>Prior Year Actual</td>
<td>950</td>
<td>29.3</td>
</tr>
</tbody>
</table>

Method used to calculate savings description:

IV.4 DOE-Funded Leveraging Activities

During preparation for the WAP BIL application, Minnesota engaged Service Providers (sub-grantees), community organizations, utilities, and other stakeholders to discuss opportunities for increased partnerships and leveraging funds as methods for expanding services to income-eligible Minnesotans and to increase the number of households served. While a summary of the stakeholder comments is attached to this application, this input was considered and incorporated in the development of this Leveraging Plan.

1. Service Provider Education, Planning, and Training on Leveraging Activities

During the course of the WAP BIL grant term, Minnesota will partner with Service Providers to identify and implement ways of maximizing leveraged funds and partnership opportunities to support the weatherization of homes.

Through the stakeholder engagement process - in which Minnesota and Service Providers met for an all-day WAP BIL planning day in association with the WAP BIL file development - it was identified that additional communication on what is allowable and possible using Leveraging Funds provided through the weatherization program, as well as an understanding of how to further implement leveraging activities, would be beneficial.

It was also acknowledged that effective partnerships can be maximized when driven at the local level with state-provided technical and financial support.

Based on this information, Minnesota is proposing a **Framework for Effective Leveraging** approach to offer Service Providers the resources, knowledge, and
skills to maximize leveraging and partnership opportunities and provide additional services to income-eligible Minnesotans.

The Framework for Effective Leveraging approach starts with training and planning workshops, includes the development of local plans, and concludes with the implementation of the plan with provided resources. The framework goes beyond traditional Leveraging and is meant to recognize the skills throughout – and outside – the network, as well as the benefits of peer learning in all aspects of the WAP BIL planning, which can be tapped for increased equitable implementation and greatest effectiveness.

**Framework for Effective Leveraging Workshops**

Workshops, up to six over the course of the first year, will be offered on various topics under the WAP BIL plan and provide Service Providers information about the allowable expenses and activities that can be implemented with allocated Leveraging Funds. These sessions will also include an opportunity for Service Providers to share best practices between organizations and provide a template for a localized plan and the technical assistance in developing the plan.

Minnesota will engage with Weatherization Coordinators and other appropriate staff at Service Provider agencies, to increase their knowledge about allowable activities and expenses with allocated DOE WAP Leveraged Funds. Through case studies, sharing of best practices, tips for building partnerships with Community-Based Organizations, and a review of the relevant regulations, Minnesota will grow the collective knowledge of the Network in pursuing Leveraged Funds, building on the partnership activities already in place, and initiating new partnerships to serve income-eligible households.

Minnesota will further provide the tools and templates to create a local plan. Working with Service Providers to identify local opportunities, internal barriers, staff capacity, and organizational priorities, Minnesota will support Service Providers in developing plans that reflect the priorities and opportunities for local decision-making and accountability for grant funds.

Next, Service Providers will be offered up to $50,000 annually to implement the steps in the local plan. Examples of uses of Leveraging Funds include (but are not limited to):

- Development of relationships with Utilities in order to build low-income CIP/ECO use of funds in WAP-served households.
- Partnerships with AmeriCorps Programs – or other service-based organizations- to assist in developing in-kind contributions to increase client education or other services.
- Grant writing to foundations to meet program gaps or address program inequities.
- Time spent implementing and tracking other locally driven partnerships.

With the provided training and the developed plan, Service Providers will be prepared to utilize the resources effectively and increase services for their clients.

2. **Partnership Development to Support Equitable Services**

Minnesota will also continue to develop partnerships around the Weatherization Assistance Program. Our goal is to increase equity in our delivery of services and leverage additional resources to deliver services to more households and more comprehensive services to those households.

**Place-Based Implementation of WAP**

Using the previously described Framework for Effective Leveraging, Minnesota will offer Service Providers the opportunity to learn, plan, and implement strategies around Community-Based or Place-Based Implementation of the Weatherization Assistance Program. A place-based or community-based weatherization initiative is a form of building community-based trust relationships and micro-targeting weatherization outreach or services in order to address a historically underserved geographic area or particular demographic group.

Through education and the development of the local plan, Service Providers can then seek the ability to address and prioritize populations on a geographic basis within the other eligibility requirements of the program. This will allow for WAP to address program-based inequities and serve Disadvantaged Communities, as well as those neighborhoods or demographic groups historically underserved by MN WAP, more equitably. It will also allow for efficiency in services where bulk-buy or bundled services allow contractors to bid for a group of jobs, lowering the overall cost of service through efficiencies of scale and decreased travel expenses.

**Data-informed Equity Mapping or “WAPMap”**

The current Beta version of [WAPMap](#) is an online, interactive tool with data such as the percentage of the population in poverty (<100% FPL) or eligible for WAP (< 200%), the percent of the population identifying as Black, Indigenous, or people of color; the average energy burden for households in poverty, the location and size of manufactured home parks, and the location of Opportunity Zones and the Social Vulnerability Index (SVI). Layers displaying various geographic boundaries can be selected to display on WAPMAP, including utility service territories, tribal lands for the 11 Tribal Nations who share geography within Minnesota boundaries, and the historically red-lined neighborhoods within Minneapolis, St. Paul, Rochester, and Duluth.
Equity gap analysis of WAP’s historical performance, in combination with WAPMAP census-tract information, will allow for targeting of WAP efforts to better deliver equitable service to historically underserved communities and those most in need.

As outlined in Minnesota’s Formula DOE State Plan/Application, the new private WAPMAP tool will allow layering-in of weatherized, deferred, and waitlisted WAP household locations, to allow Minnesota staff to more efficiently identify historical service levels in recognized Equity Gap target areas and design initiatives to address the gaps.

**Increasing Equity-Based Program Access**

Using the previously described *Framework for Effective Leveraging*, Minnesota will offer Service Providers the opportunity to learn, plan, and implement strategies around issues of service equity. Specifically, two workshops with educational content, case studies, best practices, and which allow Service Providers to develop local plans, will focus on topics such as:

- Expanding services to underserved clients including Understanding Justice 40, Tribal considerations, defining and reaching Disadvantaged Communities, and rural/remote populations.
- Expanding services to Renters including Partnering with HUD, NOAH properties, MN Housing, and addressing barriers to reaching more renters.

The content of these workshops and the resulting local plans will focus on improving the delivery of services to categories of clients where historical Equity Gaps exist.

**Policy Advisory Committee Expansion**

The Policy Advisory Committee (PAC) also participated in the stakeholder engagement process in the development of the WAP BIL. Through this engagement, the PAC identified multiple areas where additional representation would benefit the ongoing evolution of the Minnesota Weatherization Assistance Program and leverage the resources of members.

PAC members identified a desire to expand the PAC to include more diversity and representation in health care, housing regulatory associations, real estate, advocacy, seniors, people with disabilities, municipal or cooperative utilities, etc.

PAC members also expressed interest in membership representative of households served by the Weatherization Assistance Program. In the interest of bringing a client perspective to the Policy Advisory Committee, Minnesota will initiate a stipend program to both remove barriers to participation and recognize the importance of the perspectives brought forth by those that have directly experienced the program. The stipends will follow current state stipend/procurement rules.

The state will also utilize the PAC to continue to develop methods or strategies to increase both the equity and leveraging of the diverse resources within Minnesota.

3. **Supporting Implementation of Innovative Approaches for New Relationships and Funding Opportunities**

In addition to supporting locally driven leveraging activities, Minnesota Leveraging Staff will continue to research and pursue funding opportunities and new partnerships in order to eliminate barriers to providing comprehensive service.

**Measures Analysis**

Minnesota recognizes the importance of periodically reviewing approved measures in order to reflect the changing impact of federal and state guidance, technologies, pricing, and weather on WAP-eligible households. A Measures Analysis will be contracted to review current Minnesota-approved measures and identify potential measures for expanded services with US DOE or other leveraged resources.

Technologies to be considered include (but are not limited to): insulated skirting, outdoor wood boilers, manufactured housing options for windows/doors, water-related measures, lead-based windows, standalone freezers, electrification preparedness, and climate-resilience measures such as sump pumps and fortified roofing, etc.

**Pursue State-Level Funding**

One such area Minnesota will continue to pursue is State Funding to address deferrals, outreach, and training needs. During the last legislative session, Minnesota was poised to allocate a significant amount to address the most common issues that cause weatherization deferral in Minnesota and to increase the training of pre-weatherization staff. While legislation passed the Conference Committee, it was not fully passed into law. However, it is anticipated that the work that the State and numerous stakeholders, including bi-partisan support from legislators, completed last year, will provide opportunities, and hopefully long-term funding, to address program gaps.
Part of this collaborative approach was enhanced through the Weatherization Working Group, an informal cross-sector group of diverse stakeholders that developed both legislative and programmatic recommendations for MN WAP to pursue.

Assessment

The funds utilized for leveraging activities at the local or state level are set forth by DOE with the expectation of 1:1, meaning for every federal dollar spent, no less than one dollar in non-federal funds is leveraged. It is the goal of Minnesota to leverage $2 for every $1 in federal funding reserved for leveraging activities. All leveraging will be tracked and assessed towards the goal over the course of the life of the WAP BIL Funding. In addition to funding, increased partnerships, volunteerism, and in-kind donations will be tracked through a Customer Relations Management (CRM) tool and as such has budgeted funding to develop the CRM tool.

Minnesota Staffing:

Minnesota will engage several staff members to conduct the activities highlighted here. Some of these positions have already been funded via DOE Formula Funds and some will be funded through BIL.

The following positions are existing positions within the team:

**Lead Projects Developer:** This position is partially funded with WAP Formula Funds and is being modified to focus on the development of new, innovative initiatives for the WAP.

**Senior Training & Outreach Specialist:** Funded with non-DOE resources, this position exists to ensure effective communication and partner relations with the existing network and to expand relationships with additional training and outreach providers.

**Senior Projects Administrator: Leveraging Resources:** Partially funded with Formula DOE Funds, this position exists to lead project management efforts related to leveraging and innovation initiatives that address targeted needs associated with the Weatherization Assistance Program (WAP). This position also leads analysis efforts for WAP regarding the unmet needs of the client community.

Three additional positions will be added to the Minnesota Weatherization Team using the WAP BIL Funding.

**Equity, Innovation, & Outreach Coordinator:** This new position will lead leveraging activities for the Energy Equity Team with a particular focus on equitably increasing the number of income-eligible households with access to efficiency and renewable energy resources through WAP. This position will also lead the pursuit of funding for increasing the breadth and depth of services. This position will be supported by WAP BIL Funding.

**Senior Project Administrator: Utility+ Partnerships:** This position will focus on growing Utility Partnerships across Minnesota both by working directly with Utilities and their Conservation Improvement Programs (CIPs) and by supporting Service Providers as they develop relationships with CIPs.

**Systems Administrator:** This position will focus on the development and use of WAP-specific technological resources, including the CRM, WA, and other database/software systems utilized by the State or the Network of Service Providers.

### IV.5 Policy Advisory Council Members

- **Check if an existing state council or commission serves in this category and add name below**

<table>
<thead>
<tr>
<th>Type of organization:</th>
<th>Utility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Name:</td>
<td>Carter Dedolph</td>
</tr>
<tr>
<td>Phone:</td>
<td>6123214412</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:carter.dedolph@centerpointenergy.com">carter.dedolph@centerpointenergy.com</a></td>
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<tbody>
<tr>
<td>Contact Name:</td>
<td>Brian Edstrom</td>
</tr>
<tr>
<td>Phone:</td>
<td>65130047016</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:briame@cubminnesota.org">briame@cubminnesota.org</a></td>
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<tr>
<td>Contact Name:</td>
<td>Joel Haskard</td>
</tr>
<tr>
<td>Phone:</td>
<td>6126258759</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:haska004@umn.edu">haska004@umn.edu</a></td>
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<tr>
<td>Contact Name:</td>
<td>Joan Markon</td>
</tr>
<tr>
<td>Phone:</td>
<td>2188794593</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:joanmarcon@fdlrez.com">joanmarcon@fdlrez.com</a></td>
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IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF 424)

<table>
<thead>
<tr>
<th>Date Held</th>
<th>Newspapers that publicized the hearings and the dates the notice ran</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/09/2022</td>
<td>On September 9, 2022, notice of a Virtual State Plan public hearing was sent to all WAP Service Providers and subscribers of the WAP Wire and Conservation Improvement Program newsletters, which focuses on utilities (8,500+). The draft copy of the PY22 WAP BIL State Plan was posted on the Commerce website on September 9, 2022 and a link to the posting was included in the Notice. Two Virtual Public Hearings took place on September 19 at 11:00 PM and 2:00 PM via WebEx to comply with the public hearing requirements in 10 CFR 440.14 and COVID-related guidance from DOE.</td>
</tr>
</tbody>
</table>
IV.7 Miscellaneous

Note: In order to maintain a consistent application of program rules, any modifications made to the WAP BIL Master File will be incorporated as rules for all DOE funding except where specifically delineated.

Recipient Business Officer:

Prefix: Ms.
First Name: Amy
Last Name: Trumper
Title: Chief Financial Officer
Telephone Number: (651) 539-1517
Fax: (651) 539-0109
Email: amy.trumper@state.mn.us

Recipient Principal Investigator:

Prefix: Mr.
First Name: David
Last Name: Ramstad
Title: Energy Equity Programs Supervisor
Organization Affiliation: Department of Commerce/Div. of Energy Resources
Telephone Number: (651) 539-1866
Fax Number:
Email: David.ramstad@state.mn.us

Davis Bacon Act Compliance

As noted in the Leveraging Plan included previously, Minnesota intends to invest time early in the WAP BIL funding term to help Service Providers determine their capacity to weatherize both increased numbers of single-family and multifamily units. In those discussions around capacity, Davis Bacon Compliance will be described and discussed as one factor to consider when agencies determine their ability to complete multifamily jobs.

Service Providers who determine that they have the ability to commit to weatherizing multifamily units will receive support directly from Minnesota in addressing Davis Bacon Act requirements. Minnesota will provide training which is aligned with forthcoming DOE guidance on developing the systems to gather, track, and report on wages as they relate to prevailing wages on similar jobs.

For those Service Providers who determine they do not have the capacity, another Service Provider or an outside contractor will be brought in to develop multifamily projects following appropriate procurement processes. In the case where the provider is one of the current Service Providers in the network, the above training will be implemented. For a new provider, the anticipation is an eligible firm would have existing systems in place for gathering the required wage information.

In either case, the Program Management software currently in development will provide the system to track the required information and will also be based on the guidance anticipated from the DOE.

Buy American Provisions

Minnesota is prepared to implement the Buy American Provisions per Department of Energy guidelines when they are available. Using our current communication channels, Minnesota will provide guidance to the Service Provider Network on the appropriate process and documentation to ascertain and document compliance. This guidance will be reinforced at the mid-year Policy Roll-out generally scheduled for January. The software currently used to house Contractor eligibility documentation will also be used to store Buy American Provision documentation.

Fuel Switching
Minnesota has been approved to authorize Fuel Switches locally since 2016. These are reviewed on a case-by-case basis to determine cost effectiveness and reasonableness in the given circumstances.
V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

The Minnesota Department of Commerce (Minnesota) uses a combined LIHEAP/WAP application to determine eligibility for both the Energy Assistance (LIHEAP) and Weatherization Assistance Programs (WAP). For the purpose of this application, income is defined as all income and all money received by each household member. This includes:

- Wages
- Minnesota Family Investment Program, Diversionary Work Program, General Assistance
- Spousal Support or Alimony
- Disability Payments, Veteran’s Benefits, Workers’ Compensation, Social Security, RSDI and SSI
- Unemployment Compensation
- Self Employed, Farm, and Rental Income
- Interest, Dividend
- Retirement Income
- Pensions and Annuities
- Tribal Bonus, Judgments or Per Capita Payments

Describe what household eligibility basis will be used in the Program

A dwelling unit is eligible for Weatherization services if it is occupied by a household whose income is at or below 200% of Federal Poverty Income Guidelines or is eligible for assistance under the LIHEAP income limit of 60% of State Median Income, whichever is greater, as allowed by 10 CFR 440.22 and required under Minnesota 2009 Session Laws, Chapter 138, Article 2, Subd. 4.

Households in which one or more members have received payment under Title IV or XVI of the Social Security Act during the preceding 12 months are also eligible.

Households with both ineligible household members and eligible household members may apply for weatherization services to benefit the eligible household members. All household income (including income from ineligible household members) must be considered when determining eligibility. When determining level of benefits, income of ineligible household members must be excluded. Ineligible household members may apply for weatherization services to benefit eligible household children, providing that SSN and proper documentation is provided at the time of application.

In all cases stated above, eligibility is determined by the eHEAT software system, a tool developed by Minnesota’s LIHEAP program with input from WAP staff. The eHEAT system determines income eligibility and centralizes payments to utility companies.

The eHEAT system also identifies individuals that do not qualify for LIHEAP but are eligible for WAP. For individuals that choose not to apply for LIHEAP, the application and eHEAT process is used to determine eligibility for WAP services.

When Minnesota or its sub grantees certify that applicants have met the income requirements of HUD means-tested programs according to WPN 22-5, the method of verification of eligibility will be included in the client file.

All application eligibility expires 12 months from certification date if work on dwelling unit (energy audit) has not been initiated.

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

As noted, the Minnesota Department of Commerce (Minnesota) uses a combined LIHEAP/WAP application to determine eligibility for both the Energy Assistance (LIHEAP) and Weatherization Assistance Programs (WAP). All potential recipients of WAP services are asked to provide information that ensures they are eligible as described. Per Energy Assistance Program Policy Manual FFY23 produced by the Minnesota Energy Assistance Program, qualified aliens may provide an alternative to a Social Security number to meet this requirement.

FFY23 EAP Policy Manual (mn.gov)

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation
When occupied by an eligible household, the following dwellings are eligible for weatherization, whether owner-occupied or rental properties:

- Single Family Homes;
- Mobile Homes/Manufactured Homes;
- Multifamily buildings containing 2 or more units;
- Townhomes (treated as individual single-family dwellings provided there is a physical separation between each townhome’s thermal barrier, air pressure boundary, mechanical systems, and individually metered units).

**Owner Occupied Dwellings Proof of Ownership**

Service Providers must verify home ownership and add proof of ownership to the household file for owner-occupied households. Proof of ownership ensures that proper authorization is obtained prior to weatherizing a dwelling.

Proof of ownership documentation includes:

- Property tax statements;
- Mortgage statements;
- Contract for deeds recorded with the county;
- Quit claim deeds recorded with the county;
- Online or written information from a county recorder or assessor;
- Official county receipt for transfer of title;
- Ownership validation from a tribal government;
- Other documentation preapproved by the Minnesota Department of Commerce.

Mobile/manufactured homes may be owned either as personal property or real property. If the mobile home is titled through Driver and Vehicle Services, it is considered personal property and the Certificate of Title issued by Driver and Vehicle Services serves as proof of home ownership. If the mobile home title was surrendered to the county, then the home is considered real property and documentation of ownership would be the same as for other nonmobile homes.

**Rental Dwelling Income Documentation Requirements**

Single-Family Rental Requirements: a single-family dwelling (one unit) must be occupied by an eligible household prior to the start of any weatherization activities. Household eligibility is determined through review of household-supplied information contained in eHEAT as described earlier.

**Multifamily Rental Requirements**: Service Providers may weatherize multifamily buildings containing two or more units. Weatherization is designed to occur on the whole building in a systems approach. A single unit within a multi-unit building may not be weatherized.

Eligibility for each building in a multifamily complex of buildings is determined separately. For a multifamily building to be eligible for weatherization services, at least 66% of the building units (50% for duplexes and fourplexes and “certain eligible types of large multifamily buildings” as referenced in WPN 16-5) must meet one of the following:

- Have income-eligible households in the dwelling units, or;
- Will have income-eligible households in the dwelling units within 180 days under a Federal/State program for rehabilitating the building.

Prior to being accepted into the Weatherization program, multifamily buildings are checked against household eligibility requirements, and the expenditure limits for Weatherization work in the building are verified.

When Minnesota or its sub grantees certify that applicants have met the income requirements of HUD means-tested programs according to WPN 22-5, the method of verification of eligibility will be included in the client file.

Rented townhomes with complete separation between the building units’ thermal barriers, air pressure boundaries, mechanical systems, and with individually metered units may be treated either as individual units, or, if eligibility is met, as a multifamily building.

**Describe Reweatherization compliance**

Minnesota maintains a centralized previously weatherized list in the production management software used by all Service Providers. This centralized list captures all homes previously weatherized using DOE funds in Minnesota and is based on the historical previously weatherized lists of all active and past Service Providers. Service Providers verify previously weatherized status via the software to ensure current eligibility prior to undertaking Weatherization work on the home. Weatherized Households are added to the list as Weatherization work is completed.

With re-weatherization guidance from DOE, Minnesota adjusted procedures accordingly. Specifically, the production management software has been programmed to address the rolling 15-year time frame and allows only qualified homes to progress through the weatherization process.

Minnesota will also verify previously weatherized houses completed by HUD, HHS and USDA per the forthcoming DOE guidance.
Describe what structures are eligible for weatherization

Structures that are eligible for weatherization include single-family, manufactured homes, and multifamily buildings. Minnesota has approved audits for single-family (2021), manufactured homes (2021), and multifamily buildings (2019). Nontraditional dwelling types such as shelters and mixed-use buildings may be allowed but must be reviewed and approved by Minnesota prior to weatherization to ensure that the dwelling meets program regulations. (Section 3.4 of the Minnesota Weatherization Assistance Program Policy Manual addresses mixed-use buildings.) If deemed necessary, Minnesota will seek approval from the USDOE Project Officer for the weatherization of a nontraditional dwelling. Single-family structures must be occupied prior to weatherization. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicant is not allowed per DOE regulation.

Service Providers are required to complete a State Historic Preservation (SHPO) review for all dwellings prior to the commencement of any weatherization activity. Minnesota’s SHPO Programmatic Agreement (PA) was extended until 12/31/2025. Compliance monitoring includes verification of SHPO review and previously weatherization status in sampled household files.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental dwellings have equal access to WAP services as owner-occupied dwellings with household eligibility determined as described above.

Per 10 CFR 440.22, Service Providers may weatherize rental properties where tenants do not directly pay heating bills, provided the benefits of weatherization accrue primarily to the income-eligible tenant(s).

In those cases, property owners must provide detailed justification to Service Providers indicating how benefits of weatherization will accrue to tenants.

Examples of accrual of benefits to tenants who do not directly pay heating bills include, but are not limited to:

- Investment of the energy savings from weatherization work in specific health and safety improvements with measurable benefits to tenants,
- Longer term preservation of the property as affordable housing,
- Investment of the energy savings in facilities or services that offer measurable and direct benefits to tenants,
- Improvements to heat or water distribution and ventilation to improve the comfort of residents,
- Continuation of protection against rent increased beyond the local written agreements required under WAP regulations (10 CFR 440.22), and
- Establishment of a shared savings program.

Once deemed sufficient by the Service Provider, Minnesota approval is required prior to beginning weatherization work.

Service Providers and property owners are required to sign a Property Owner Agreement prior to the start of weatherization work which must contain several elements:

- The Property Owner Agreement must contain written permission of the building owner (or agent) for Weatherization service personnel to undertake weatherization work on the building.
- The Property Owner Agreement must state that rent on WAP weatherized properties (those using USDOE funds) cannot be increased because of the increased property value associated with the weatherization work. This agreement is required to be in force to cover “a reasonable period of time after weatherization work has been completed.”
- Property Owner agreements must contain language that no undue or excessive enhancement shall occur to the value of the dwelling unit being weatherized.
- Tenants may file complaints to Service Providers, Minnesota, or both if concerns arise over the agreed upon terms of the Property Owner Agreement. Property Owners, in response to such complaints, shall demonstrate that the rent increase concerned is related to matters other than the weatherization work performed.

During Annual Administrative Monitoring, Minnesota confirms that each Service Provider has a Property Owner Agreement in place and that it follows Minnesota WAP Policy.

Eligibility for each building in a multifamily complex of buildings is determined separately. For a multifamily building to be eligible for weatherization services, at least 66% of the building units (50% for duplexes and fourplexes and “certain eligible types of large multifamily buildings” as referenced in WPN 16-5).

Minnesota requires the property owner to financially contribute to the weatherization of a multifamily property with five or more dwelling units, except in cases where the property owner also qualifies for weatherization services. Service Providers have discretion in setting the level of contribution. Local Service Providers may choose to require a property owner contribution when weatherizing rental properties containing

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Describe the deferral Process

There are conditions or situations when an eligible dwelling unit should not be immediately weatherized, but rather deferred until unacceptable conditions are mitigated. A deferral determination may be made during the eligibility process, during the audit, or after weatherization work has begun.

Service Providers may elect to defer a home from receiving weatherization services when health and safety hazards exist for the staff, contractors, or clients, or when conditions exist in the home which cannot be addressed by WAP and which prevent the safe and effective implementation of weatherization measures. Weatherization work will be postponed until the problems are resolved or alternative resources are found to address the hazards.

Service Providers are expected to pursue reasonable options on behalf of the dwelling owner and to use good judgment in dealing with difficult situations. Service Providers shall not defer service without pursuing other options and identifying other resources to address the identified hazards. Whenever appropriate, educational information on how to address the hazard is shared with the occupant. If corrections are made to the deferred dwelling and the corrections eliminate the issue that led to the deferral, the Service Provider may proceed with weatherization so long as the household's EAP application is current and approved.

Service Providers are required to track deferred units and deferral reasons in a centralized location in the production software (currently FACSPro). This is also the software that tracks eligibility and so those records are connected through the software. The record for each deferred household is assigned a deferral number which may include vermiculite, clutter, structural repair issues, etc.

Conditions where Service Providers must not use DOE funds to weatherize dwellings include:

- The dwelling was weatherized less than 15 years prior to the current date;
- The dwelling is scheduled for demolition;
- The condition of the structure would make weatherization impossible or impractical (e.g., inability to meet SWS).

Other deferral situations may arise as the result of a review and judgement made by the Service Provider. Examples where the deferral may occur, depending on the Service Provider assessment, include, but are not limited to:

- The dwelling is in the process of being sold;
- The dwelling is in the process of being remodeled;
- The owners have refused cost effective measures determined by the energy modeling software tool. Service Providers must then defer that dwelling per WPN 19-4 attachment 8 unless approval from Minnesota is requested and approved;
- The building structure or its mechanical systems (including electrical and plumbing), are in such a state of disrepair that failure is imminent, and the conditions cannot be resolved cost-effectively;
- The house has sewage or other sanitary problems that would further endanger the client and or weatherization installers if weatherization work were performed;
- The house has been condemned or a major household system (electrical, heating, plumbing, or other equipment) has been "red tagged" by a local or state building official or a utility, and the unacceptable conditions cannot be resolved with WAP funds;
- The dwelling has severe moisture problems that cannot be resolved under existing health and safety measures and with minor repairs;
- The dwelling has dangerously high carbon monoxide levels in combustion appliances that cannot be resolved under existing health and safety measures;
- The extent and condition of lead-based paint in the house would potentially create further health and safety hazards;
- The energy auditor determines a condition(s) exists which may endanger the health or safety of the work crew or subcontractor, requiring that the work not proceed until the unsafe condition is corrected;
- The client has a known health condition(s) that prohibits the installation of insulation and other weatherization materials;
- Dwellings that contain vermiculite insulation, as all vermiculite insulation is assumed to contain asbestos, and are unable to be remediated based on lack of
funding or available contractors.

- The cost to weatherize a home is so significant that it will negatively impact the Service Provider’s ability to meet the statewide average cost per dwelling. Minnesota must be notified in writing prior to deferring a dwelling for this reason.

Service Providers may also defer households for the reasons below. In these cases, Service Providers must issue, in a timely manner, written notification to the client. Client signatures on a deferral form are not required in cases where Service Provider staff feel threatened or unsafe. In these cases, notification by certified mail is recommended.

- The presence or use of any controlled substance is evident or observed by auditors, inspectors, contractors, crews, or anyone else who must work on or visit the home;
- The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.

In cases where an individual client feels a deferral is unfairly determined, the client may appeal a decision to defer.

Additional information about deferral process can be found in the Minnesota Weatherization Assistance Policy Manual Section 3.8 (Policy Manual attached).

A client whose home is deferred must be informed of their right to appeal per the client appeals policy outlined in policy Minnesota Weatherization Assistance Policy Manual Section 1.6.

As noted in other places in this application, Minnesota continues to work to create partnerships to reduce the number of deferred units. To date, Minnesota has been successful in addressing the largest single cause of deferrals in our state: vermiculite. Through funding from the State and now Utilities, Minnesota has established the Healthy AIR fund which Service Providers can access to address vermiculite remediation rather than defer homes.

Additionally, Minnesota sought and was recently awarded an Enhancement and Innovation Grant by the Department of Energy which will support the WIRED Access initiative. This initiative will remediate roofing and electrical system barriers that would otherwise result in up to 85 homes being denied services and will focus on homes specifically in historically red lined districts.

As outlined elsewhere, Minnesota will also continue to work with Service Providers to increase partnerships and support for initiatives that reduce deferrals via the Framework for Effective Leveraging workshops and other efforts.

V.1.3 Definition of Children

Definition of children (below age): 19

V.1.4 Approach to Tribal Organizations

☐ Recommend tribal organization(s) be treated as local applicant?
If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

All eligible households, including those with Native American Indian members, are served equally without regard to race, color, national origin, gender, or religion. The Minnesota Weatherization Assistance Program contracts directly with three of Minnesota’s tribal nations. Tribal sub-grantees for the Minnesota WAP program are Fond du Lac Reservation Business Council, White Earth Reservation Tribal Council, and the Mille Lacs Band of Ojibwe. The other five tribal nations within Minnesota are served by the WAP Service Providers who serve the closest geographic territory to tribal lands.

V.2 Selection of Areas to Be Served

Minnesota serves all 87 counties in the state and provides equal access to WAP services for all eligible households. The Minnesota Weatherization Assistance Program serves these 87 counties via a network of 23 Service Providers. Service Providers are either Community Action Partners, Tribal Nations, Counties, or other nonprofit organizations.

V.3 Priorities
As required by federal regulation, Minnesota WAP prioritizes households which contain:

- Children under 19;
- Persons with disabilities;
- Elderly persons;
- A high-energy burden;
- High-energy use.

On an annual basis, WAP staff work with LIHEAP staff to determine thresholds for high energy use and high energy burden. In PY20, Minnesota updated the high energy burden priority to use the median energy burden for all low-income Minnesota households from the American Communities Survey data from 2016 that was made available through the LEAD tool.

Service Providers set the order of priorities to determine which households to weatherize first and may elect to use a combination of priorities to best serve the eligible population in their service territory. Service Providers may also choose to queue waiting households within a prioritization category based on the length of time since the EAP/WAP application approval date. Service Providers are required to have a documented policy for their prioritization system, and they must not discriminate due to housing type.

High energy use households, especially those without secondary heat sources, may be prioritized by a Service Provider when an energy crisis is anticipated or in the year following an energy crisis, especially for households using high-cost fuels such as propane.

Service Providers communicate to Minnesota the household prioritization criteria they will use and then select from eligible applicants in their Service Area based on the prioritization system they have documented. Minnesota staff monitor for performance against goals during the annual Administrative Monitoring visit.

Place-Based Implementation of WAP

Under WAP BIL funding, Minnesota will offer Service Providers the opportunity to learn, plan, and implement strategies around Community-Based or Place-Based Implementation of the Weatherization Assistance Program. This approach allows for micro-targeting weatherization outreach or services in order to address an historically underserved geographic area or particular demographic group.

Using the Framework for Effective Leveraging approach (education and the development of the local plan), Service Providers can address and prioritize populations on a geographic basis within the other eligibility requirements of the program. This will allow for WAP to address program-based inequities and serve Disadvantaged Communities and neighborhoods or demographic groups historically underserved by MN WAP, more equitably. It will also allow for efficiency in services where bulk-buy or bundled services allow contractors to bid for a group of jobs, lowering the overall cost of service through efficiencies of scale and decreased travel expenses.

V.4 Climatic Conditions

Minnesota has a continental type of climate, subject to frequent outbreaks of continental polar air during the cold season and periods of prolonged heating during summer, particularly in the southern portion of Minnesota. Mean annual temperatures range from 37.4 °F in the extreme north to 48.85 °F along the Mississippi River in the southeast. State temperature extremes range from 60 to 114°F. Monthly mean temperatures vary from 85°F in the southwest to 11°F in the northwest. Mean temperatures during January in the northern portions of the State average near 4°F.

Minnesota is located in International Energy Conservation Code Climate Zones 6 and 7. Minnesota uses the Weatherization Assistant software and adjusts for client’s specific climatic conditions and fuel costs as appropriate. Average Heating Degree days in Minnesota range from 7,340 to 10,269. Average Cooling days in Minnesota range from 128 to 937.

(Sources: National Weather Service and Minnesota Department of Natural Resources)

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials
All weatherization work in Minnesota is performed in accordance with DOE-approved procedures, including the appropriate DOE-approved energy audit (single family, multifamily, or mobile home), the Minnesota WAP Policy Manual, 10 CFR 440 Appendix A, and the Standard Work Specifications (SWS). Minnesota provides Service Providers with “RETROFITTING MINNESOTA: STANDARD WORK SPECIFICATION-ALIGNED FIELD GUIDE” (Retrofitting Minnesota -- SWS- Aligned Field Guide for Weatherization Crews (mn.gov)), which contains information about audits/testing, installation of energy conservation, health and safety, and incidental repair measures, final inspections, and the Minnesota SWS Variances. The Field Guide was approved and went into effect in January 2021 and the Minnesota variances were updated and reapproved by DOE in August of 2018 and went into effect January 17, 2019. A multifamily field guide based on NREL’s Multifamily SWS also was approved by DOE also went into effect January 2021.

All sub-grantee Service Provider contracts contain the following language confirming the receipt of, and conformance with, all applicable USDOE WPNs and Memoranda, the MN WAP State Plan, the MN WAP Policy Manual, and the MN WAP Field Guide including the SWS for single family, multifamily and mobile homes.

“The Grantee will perform work and expend funds within the above timeframes. Work must be performed in full accordance and to the quality of the specifications outlined in the following: The Minnesota WAP Policy Manual, Minnesota WAP Weatherization Field Guide, for single family, multifamily and mobile homes, the Standard Work Specifications (SWS), and Minnesota’s DOE Approved SWS Variances.”

**Minnesota WAP Sub-Grantee Contracts**

Sub-grantees (MN Service Providers) have access to the WAP Policy Manual, Field Guide, and a number of other documents and information resources at the provider-facing weatherization site. In signing the contract, sub-grantees confirm that they have read and acknowledged the expectations for work quality as outlined in the contract. Additional information on all standards is available through training opportunities and through technical assistance received during monitoring or by sending an email to the weatherization inbox seeking technical guidance.

Service Providers are required to include similar language in their contracts with contractors who perform work for WAP. MN WAP Policy Manual Section 7.4.3 requires:

1. There is written agreement with all contractors specifying the terms and conditions under which work will be performed, including consequences for non-compliance or underperformance
2. Contracts confirm the terms, conditions, and specifications of the agreement.
3. Contractors complete work that is in accordance with the policies in the MN WAP Policy manual.

These contracts include acknowledgment that their contractors have read and acknowledged the expectations for work quality including the Minnesota WAP Policy Manual, Retrofitting Minnesota Standard Work Specification-Aligned Field Guide, the Standard Work Specifications (SWS), and Minnesota’s DOE Approved SWS Variances. Contractor signatures on the contract indicate receipt of the relevant documents and agreement to conduct weatherization work to the indicated standard. Dependent on the individual Service Provider, these are provided as hard copies or web links. Administrative monitors review contracts for compliance. Field monitors, through monitoring inspections, confirm conformance with the SWS.

The following materials are approved for use and not in Appendix A of CFR 440:

- Grantee-administered fuel switching authority 2/10/2016
- LED lighting approved by DOE 4/8/2016
- Spray foam as an insulation material 9/4/2018
- NEAT/MHEA ECM lifetimes 3/20/2019
- Refrigerators 7/9/2019
- Domestic hot water (DHW) heater replacements 7/9/2019
- Single-Family Solar photovoltaics (PV) as a pilot 9/5/2019
- ECM Furnace Motor Replacements 4/13/2021
- Photovoltaic Systems (PV) within the constraints of the NEPA waiver 7/26/2021

Field guide types approval dates

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**V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE
V.5.3 Final Inspection

The Minnesota Weatherization Policy Manual specifies the activities and tests that must be completed in a final inspection and the process for rework should the need arise (MN WAP Policy Manual 4.6). Final inspections on weatherized homes are conducted to confirm that all work was done to the SWS standards and in a workmanlike and professional manner. Dwelling units may not be reported as complete until all work passes a final inspection and all required signatures are obtained on the required forms. Each Service Provider or its authorized representative is required to use a certified Quality Control Inspector (QCI) who is in good standing with the Building Performance Institute to conduct all final inspection of all dwelling units. The QCI may oversee and signoff on final inspection duties conducted by non-QCI certified staff related to NEAT data entry, fiscal entry, etc.

At the beginning of each program year, Service Providers will provide Minnesota the names and BPI certification numbers of the QCIs they intend to use for final inspections. Minnesota will maintain a current list of QCIs to ensure that adequate numbers are available to inspect all jobs statewide.

Minnesota uses monitoring forms that are provided to Service Providers prior to monitoring visits (included in attachments to SF-424). These forms are structured to ensure compliance with the work quality requirements outlined in WPN 22-4 Section 1.

Service Providers will provide QCI-certified inspections according to the following protocol:

Independent QCI: A final inspection on every home will be conducted by a QCI who was not involved in the weatherization work on the home, either as the auditor or as a member of the crew. State field monitoring will be done through Minnesota by a certified QCI. Minnesota will conduct field monitoring visits of at least five percent of all completed units.

Minnesota also conducts desk monitoring to ensure that QCIs are performing final inspections.

QCI Shortage: To meet production goals in a timely manner, Service Providers are responsible for maintaining staff and/or contractual relationships with QCI certified inspectors. In the case of a shortage of QCI certified inspectors in the service territory, Minnesota may choose to allow the following, in accordance with WPN 20-4:

- The QCI certified auditor performs the audit and the final quality control inspection. The auditor is not involved in any of the actual work on the home. In this case, a Minnesota certified QCI or DOE approved representative will perform quality assurance reviews of at least 10 percent of all completed units as this model does not allow for an independent review of the audit on every home.

Additionally, the Service Provider will be required to develop and submit a quality assurance plan to ensure that the individual who is functioning as both the auditor and the quality control inspector is able to consistently perform both tasks. Minnesota may choose to reduce the respective Service Provider Training and Technical Assistance allocation to cover the expense of increased monitoring.

In the PY22 Formula State Plan, Minnesota also initiated a Quality Control Inspector Mentoring Program. Under this initiative and with prior approval, Service Providers may designate QCI mentees and during the designated time period, mentees may conduct final inspections with oversight from the QCI mentor. The mentor will be responsible for reviewing all mentee’s field inspections and providing on-the-job training. While this approach is in place, Minnesota field monitors will monitor a minimum of 10% of units inspected by the mentee.

Disciplinary Actions: If a QCI is found to be negligent, either through repeat findings or gross negligence in their duties, Minnesota, with or without the support of a Service Provider, will...
V.6 Weatherization Analysis of Effectiveness

Diversity, Equity, and Inclusion Objectives

The shared value of the Energy Equity Programs Team which delivers the Weatherization Assistance Program, is to serve income eligible, underserved Minnesota residents in an equitable manner. In the interest of that goal, Minnesota has begun by making attempts to better understand the full universe of income-eligible clients in Minnesota and where we have served well and where there are gaps in weatherization service.

However, our current program management systems and software have made gathering, managing, and analyzing available information particularly challenging. To that end, Minnesota will continue to build out systems that allow for more efficient and through understanding of our client base and our gaps in service.

When this is complete, Minnesota will invest in program analysis (anticipated in 2025) that gauges the effectiveness of our energy conservation efforts as well as our outreach efforts.

Realized energy savings studies

Minnesota is not currently participating in any realized energy savings studies. Because Minnesota has over 200 utilities, bill analysis and comparison is not a feasible strategy for understanding weatherization’s effectiveness.

How is the effectiveness of Service Provider weatherization assessed?

Minnesota conducts both administrative and field monitoring, periodic desk reviews, and analysis of each Service Provider. These assessments of effectiveness are conducted through a number of methods: an administrative monitoring tool completed by the Service Provider and reviewed by Commerce staff prior to monitoring, interviews with WAP staff (coordinators, fiscal staff, energy auditors, final inspectors, crews, and contractors), onsite visits to homes that have received WAP services, and regular desk monitoring of Service Provider production and spending statuses.

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

Training needs are assessed in a number of ways. Minnesota conducts surveys with all Service Providers on their anticipated training needs at least twice each year. Minnesota also conducts a risk assessment of each Service Provider annually as part of the contracting process which identifies areas of concern and informs the number and type of trainings offered.

The staff also gathers feedback from Service Providers through email, phone, and regular meetings of the MN Weatherization Advisory Group (MWAG).

If Minnesota determines a Service Provider is not meeting goals, additional monitoring may take place in conjunction with responsive trainings to address barriers. As themes emerge, comprehensive trainings will also be scheduled. All T&TA activities are outlined in section V.8.4.

How is the Grantee incorporating monitoring feedback?

In PY 19, Minnesota hosted a DOE technical monitoring visit and continues to implement two key items from that visit: improvement to monitoring processes and identifying specific and relevant trainings and technical assistance opportunities for sub-grantees.

Specifically, the technical monitoring process was updated to include review of individual audits, Service Provider audit libraries, and audit inputs.

Minnesota’s field monitors use a combination of observing the Service Provider staff conduct diagnostics tests in the houses monitored and conducting the tests themselves with the goal of independently verifying numbers.

Minnesota has also and will continue to incorporate the DOE feedback to implement specific training and technical assistance opportunities. While more detail is provided in the Training and Technical Assistance Plan, these opportunities include energy audit review, library update process and timing, ASHRAE ventilation measurements and calculations, and contractor training on use of the field guide and Standard Work Specifications.

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

In addition to incorporating DOE Monitoring Feedback as outlined, Minnesota incorporates feedback from its Service Provider network as well as review of sub-grantee performance.

Minnesota receives feedback from the sub-grantee network in two ways. Our service provider network meets regularly as the Minnesota Weatherization Advisory Group (MWAG). The co-chairs of MWAG lead these meetings, gather feedback from members and funnel that feedback to the Minnesota Energy Equity Programs Supervisor. To close the feedback
Minnesota also gathers information through DOE’s American Customer Satisfaction Index. This feedback is reviewed with the weatherization staff and consideration is given as to how specific items can be improved. Past impacts have included network input on policy development and improved clarity and communication in monitoring activities.

Minnesota also reviews the full scope of monitoring issues encountered by the administrative and field monitors. Where trends or consistent issues are identified, consideration will be given to the appropriate response which may include communication pieces, individualized technical assistance, or formal training. This review may also instigate additional focus in monitoring or additional resources for monitors to provide as technical assistance during visits.

How is the Grantee tracking Service Provider performance reviews?

Minnesota utilizes a monitoring module within the program management software to document issues found through local Service Provider field monitoring visits. The module generates a report that includes required corrections for each household monitored along with a cover letter and summary of observations, compliance issues, and findings. Monitoring reports for all monitoring visits are sent to Service Providers within thirty days, on average, of the monitoring visit. Service Providers make corrections and upload any additional documents in the program management software within an additional thirty days. Minnesota staff then review and either close the issue or ask for additional action. Monitoring reports are stored in the program management software and are accessible to Service Providers and Commerce weatherization staff.

Administrative monitoring is managed in a similar manner outside of the program management software: monitors generate reports based on their visits including corrective steps required, responses are tracked, and issues are either resolved or further information or action is requested.

Minnesota seeks to connect the monitoring results directly with required or recommended training or technical assistance during generation of the monitoring report.

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

In cases where final inspections have failed, Service Providers require reworks and callbacks of contractors or crews, as appropriate. In addition, technical assistance is offered to individual Service Providers as needed and at times, required. All final inspections are conducted by a certified Quality Control Inspector. Under the WAP BIL Funding, Minnesota will also be initiating an In Progress Training and Technical Assistance Program. This will provide Service Providers with hands-on, on-demand training as auditors, crews, and contractors work through weatherization steps.

Minnesota anticipates that this approach will provide deeper learning for those engaged and avoid monitoring findings and disallowed costs.

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

Minnesota continues to develop and offer trainings to address monitoring issues. Past findings are reviewed prior to each monitoring visit. Major monitoring findings or concerns are followed up on until resolution is verified.

In addition, WAP staff work closely with LIHEAP staff to identify any systematic issues among shared Service Providers, with consistency and resolution.

Minnesota’s fiscal division reviews third party single audits for all Service Providers. Management decision letters are issued to any Service Provider if the audit indicates findings related to WAP or crosscutting findings that affect the management of WAP. Audit findings or the resolution of prior audit findings could potentially impact future WAP awards to a local Service Provider.

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

As outlined throughout the application, Minnesota intends to add a number of positions to both address the increased weatherization funding and to build the weatherization network.

Are there technical and financial systems that have been reviewed?

Minnesota uses the FACSPro system to streamline many fiscal, administrative, and technical aspects of the program for both Commerce and Service Provider staff. The additional development and implementation of a program management software is solely dedicated to adding efficiency and effectiveness to weatherization work in Minnesota.

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

Minnesota does not conduct market research as a means of evaluating cost accuracy, rather this evaluation is completed through the monitoring process. Monitors evaluate measure costs for each Service Provider and compares them to similar measure costs seen over the same period statewide.

V.7 Health and Safety

Please see attached Health and Safety Plan.
V.8 Program Management

V.8.1 Overview and Organization

The Minnesota Department of Commerce serves as the statewide administrator of Minnesota’s Weatherization Assistance Program (WAP). The Division of Energy Resources includes not only WAP but also the State Energy Program (SEP), Low Income Energy Assistance Program (LIHEAP), and the Conservation Improvement Program (CIP), as well as other energy regulatory departments. Grouping these programs (especially LIHEAP and CIP) provides the best opportunities for coordination of programs affecting low-income households.

In addition to USDOE funds, Minnesota manages LIHEAP and Propane funds for weatherization. USDOE funds are governed by the WAP State Plan. LIHEAP funds are governed by the LIHEAP State Plan and Propane funds are governed by relevant Minnesota statute.

The WAP staffing contingent currently consists of a program supervisor, a leveraging specialist, a leveraging projects assistant, two administrative monitors, four field monitors, a training and technical assistance principal, and training and outreach specialist, and a program administrator. The Weatherization team is overseen by the State Energy Office Director. Additional dedicated resources include a grants specialist and full-time accounting specialist.

As noted in the WAP BIL Workbook and the submitted Budget, due to the rapid expansion of the program, a new structure is being implemented with the state Energy Equity Programs supervisor (WAP Director) and three new coordinator positions: a Program Coordinator, Technical Proficiency Coordinator, and Equity & Innovation Coordinator. This structure will provide staff support and communication while the team grows from 12 to 20. New staff resources planned for include: two technical monitors, a field trainer, a training contracts administrator, a systems administrator, a second project manager for leveraging utility and other additional resources, and a management analyst. These additional staff will support the increased training and monitoring needs as well as leverage additional resources and ensure service is provided in an equitable way.

Minnesota annually contracts for program delivery activities with twenty-three local Service Providers. These Service Providers include Community Action Agencies, tribal nations, a private nonprofit agency, and a community development authority.

V.8.2 Administrative Expenditure Limits

In PY22 WAP BIL, Commerce will retain 5.25% of USDOE Program Year funds for statewide program administration. The remaining 9.75% will be allocated to sub-grantees by the allocation formula.

Sub-grantees who receive less than $350,000 in USDOE funds receive up to an additional 5% for administrative purposes. The additional funds will come from the sub-grantee’s program allocation and will be inversely prorated according to the amount of USDOE funds received. The higher a sub-grantee allocation, the less the sub-grantee will receive in additional administrative dollars. The prorated formula percent decreases at a rate of 0.5% per $25,000 until the allocation reaches $350,000.

V.8.3 Monitoring Activities

The overall goals of monitoring are to ensure compliance with federal and state rules and policies, and establish the efficiency, quality, and effectiveness of Service Provider operations. An additional goal is to identify and correct issues that have the potential to cause major program deficiencies.

Monitoring strategies include the following:

Weatherization Inbox: Service Providers are encouraged to submit weatherization program or policy questions to Minnesota staff via a group email box. Responding to these questions from Service Providers serves two monitoring purposes: reduction in the number of monitoring compliance issues and documentation of technical assistance responses for consistency.

Desk monitoring: Desk monitoring includes an ongoing review of monthly programmatic data submitted by Service Providers. Examples of reviewed data include number of units completed, number of units in progress and blow by door readings. Fiscal data is also reviewed and includes Service Provider monthly expenses and cash requests against allocations.

Fiscal review also includes audit review and financial reconciliation. Each Service Provider is required to submit their annual single audit no more than nine months after the conclusion of the agency’s fiscal year. Minnesota's Senior Accounting Officer reviews the audits for any internal control issues, crosscutting findings, or management issues.

Administrative Monitoring: Administrative Monitoring takes place to document local Service Providers’ program management, internal controls, and administrative capacity to
deliver WAP services.

**Field Monitoring:** Technical monitors visit no less than 5% of completed weatherized units with at least one visit to each contracted Service Provider annually. All Minnesota field inspections are conducted by a certified Quality Control Inspector who ensures compliance with the Standard Work Specifications.

**PY22 Monitoring Visit Details and Tentative Schedule**

(Details originally included in DOE Formula Weatherization Assistance Program for Low Income Persons Application.)

Administrative and Field Monitoring visits are scheduled typically from August through May to best fit the demands of the program year. Due to COVID-19 safety protocols, administrative and some components of field monitoring have been conducted virtually in PY22 which will continue.

In the interest of maximizing staff preparation for visits and supporting the monitoring team efforts, Field and Administrative Monitors have aligned their visits starting in PY22. This alignment allows for cross-team conversations and a more fulsome understanding of each Service Provider’s approach as well as contributes to consistency in monitoring and provides enhanced technical assistance opportunities.

**Administrative Monitoring**

Each Service Provider receives a minimum of one administrative monitoring visit annually. The components of Administrative Monitoring include:

1. **Pre-Visit Review**
   
   Administrative Monitoring Tool: Service Providers complete an Administrative Monitoring Tool prior to the visit which provides information about the approach used by the Provider (contractor vs crew, set price list vs. bidding, etc.) as well as other information on relevant compliance issues.

2. **Review**

   Administrative Monitors review the pre-visit information with Weatherization staff of each Service Provider as well as discuss production, spending, workflow, staffing, and other relevant processes.

   These reviews include follow-up on issues raised in desk monitoring and prior monitoring reports, as well as any other issues, as needed including Client/Household eligibility, internal controls related to financial management and operations, and procurement procedures.

   Household file reviews: Administrative monitors randomly sample files prior to visits to demonstrate compliance with DOE, Minnesota, and local Service Provider policies such as Client/Household eligibility, distribution of service, and adherence to procurement procedures.

   Contractor/Crew file review: Administrative monitors randomly sample contractor files to ascertain adherence to contract requirements as outlined in the Minnesota Weatherization Assistance Program Policy Manual (and DOE guidelines).

   Monitors conclude the visit with a brief “exit interview” intended to provide Service Provider staff with a high-level review of any issues found during monitoring.

3. **Monitoring Report**

   Monitors review all site documentation, discuss outstanding issues with the monitoring team, and generate a monitoring report. This report includes any compliance issues, recommendations, or best practices. The Service Provider receives the report within 30 days of the Site visit and is asked to respond within an additional 30 days.

**Field Monitoring**

Each Service Provider receives at least one onsite field visit per year, with a minimum of 5% of all weatherized households monitored statewide. All Minnesota field inspections are conducted by certified State Quality Control Inspectors.

1. **Pre-Visit Review**

   Minnesota staff reviews household files for required data, forms, signatures, bids, invoices, and other documentation. Field Monitors also review audits for the households monitored including data inputs and audit library spot checks to determine if they are current.

2. **Review**

   Field Monitors review the pre-visit information with Weatherization staff at each Service Provider. These reviews include follow-up on issues raised in desk monitoring and prior monitoring reports, as well as any other issues as needed, including but not limited to accuracy of energy audits, Training & Technical Assistance activities and needs, and compliance with Standard Work Specifications (SWS).

   Inspections of dwellings: Inspections of completed dwellings are conducted to determine compliance with federal and state requirements, client satisfaction and work quality. Field Monitors also spot check ASHRAE measurements and calculations. All household inspections are completed by a certified Quality Control Inspector.

   At the conclusion of the visit, Service Providers are briefed on observations and findings in an exit interview (either in person or virtually). Health and Safety issues are noted at that time, particularly if they present an imminent danger to occupants.
3. Post-Visit Report

Field Monitoring Reports: Written reports are provided to Service Providers within thirty days of the Service Provider visit and include information on compliance issues as well as observations on best practices or client satisfaction.

Issue Resolution

Once monitors produce the monitoring report, the Service Provider is asked to respond within 30 days. Responses may include correcting individual errors, describing new systems to avoid future errors, or return of funds for disallowed costs. All information about compliance issues and resolution is tracked and documented including the date and number of all visits by the monitors, any findings, concerns, or other issues, and resolution.

Corrective Action/Removal

In the event that a Service Provider remains out of compliance following monitoring or other interventions, Minnesota will follow the Corrective Action Process outlined in the Minnesota Weatherization Program Policy Manual (attached to this application) and as noted below.

Minnesota may impose additional requirements on a Service Provider in a written Corrective Action Plan. Corrective Action Plans may be issued in response to single issues of non-compliance or larger internal control, administrative or programmatic issues. Written Corrective Action Plans include:

- Nature of the requirements and why they are being imposed;
- Corrective actions that are needed; and
- Deadline(s) for meeting terms of the Corrective Action Plan.

With or without a Corrective Action Plan in place, Minnesota may take one or more of the following actions in response to noncompliant activity, as appropriate:

- Conduct additional monitoring visits;
- Impose additional training or technical assistance requirements on the Service Provider;
- Require additional, more detailed financial reports;
- Make payments to the Service Provider on a reimbursement basis only;
- Withhold cash payments to the Service Provider, on a temporary basis, pending correction of deficiencies or until stated performance benchmarks are reached;
- Disallow costs for noncompliant activities and/or expenses;
- Suspend or terminate the current contract, either wholly or partially;
- Withhold further contracts with the Service Provider, or;
- Institute other actions as needed.

If a Corrective Action Plan is necessary, Minnesota will work with the Service Provider to resolve issues.

In the case that a Service Provider continues to be out of compliance and, with or without a Corrective Action plan in place, Minnesota may impose additional sanctions. These may include additional monitoring visits, financial reporting, training, or technical assistance requirements, or making payments on a reimbursement basis only.

If noncompliance issues are still not resolved, or the severity of the noncompliance warrants such activity, Minnesota may terminate a Service Provider’s WAP contract upon 30 days written notice. Minnesota may elect to immediately terminate the contract if it is found that the Service Provider has failed to comply with the contract, reasonable progress has not been made, or the purposes for which the funds were granted have not been or will not be fulfilled.

WAP BIL Monitoring Schedule

The monitoring schedule is included in the WAP BIL Workbook. The intended quarter is provided for each visit (field and administrative) for PY22. In the interest of spacing monitoring visits over the multi-year grant, monitors attempt to schedule monitoring visits to Service Providers in a similar time frame each year.

Monitoring Initiatives Under WAP BIL Funding

While the principles and the core activities of monitoring will remain the same, WAP BIL funding will allow Minnesota to modify approaches and deepen interactions in order to provide additional support to the Service Provider network.

Administrative Monitoring

With two administrative monitors currently, Minnesota administratively monitors all Service Providers (23) annually. Minnesota does not intend to increase the number of administrative monitoring visits to each service provider annually but will build the capacity to identify and address “pre-corrective” action agencies and provide support services to help them avoid corrective action.

At this point, Minnesota uses the annually conducted Risk Assessment as well as monitoring visits to identify Service Providers that are beginning to move towards the high-risk category. Whether because of staffing changes, need to develop internal controls, or blind spots in policy implementation, these agencies are not yet candidates for corrective action but are moving in a direction that raises concerns and warrants extra attention.

WAP BIL funding will allow Minnesota to dedicate additional time to two to three Service Providers. Meeting monthly, addressing either monitoring issues or issues of concern to

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the Service Provider, and directly connecting with training resources, this dedicated time will provide the extra support needed to avoid more significant problems which may lead to Corrective Action.

Field Monitoring

Increased production will call for increased in-home field monitoring. While the minimum DOE requirement is that 5% of homes receiving a technical monitoring visit from a certified QCI inspector, Minnesota has always aimed higher and generally achieves monitoring of 7.8% of the homes weatherized in Minnesota each year.

Each service provider will continue to receive field monitoring annually but as noted in the WAP BIL Workbook, smaller agencies may alternate between being monitored to meet DOE Formula goals and WAP BIL goals.

In-Progress Training and Technical Assistance

WAP BIL provides Minnesota the opportunity to develop an In-progress Training and Technical Assistance Program. With the intention of providing, on-demand, in-person, hands-on direction, a qualified field technician and certified QCI will be deployed to interact with auditors, crew, and contractors to advance the work of weatherization.

Provided in a context of learning and in the moment, Minnesota anticipates that this In-Progress Training and Technical Assistance will provide longer and deeper learning for those engaged and avoid monitoring findings and disallowed costs. Perhaps even more valuable, these interactions will result in better weatherization services for our clients.

Fiscal Reconciliation

WAP BIL will also give Minnesota the capacity to expand fiscal monitoring. Currently, Minnesota reviews audits, initiates management letters as needed, and tracks all Financial Status Reports and Cash Requests as well as conducts fiscal reconciliation for a limited number of Service Providers annually. Under WAP BIL, Minnesota will be able to add to the number of fiscal reconciliations conducted annually.

Minnesota Monitoring Staffing

Given the additional demands of WAP BIL, Minnesota is making shifts to the current staffing plan. Driven both by increased production and by a desire to work differently, staffing needs will adjust as well.

More details are available in both the WAP BIL Workbook and the Budget, but below is a comparison of current monitoring staffing and our intended structure.

<table>
<thead>
<tr>
<th>Current Monitoring Staff</th>
<th>Monitoring Staffing Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy Equity Programs Supervisor</td>
<td>Energy Equity Programs Supervisor</td>
</tr>
<tr>
<td>Field Monitors (4)</td>
<td>Field Monitors (6)</td>
</tr>
<tr>
<td>Program Administrator</td>
<td>Program Administrator</td>
</tr>
<tr>
<td>Administrative Monitors (2)</td>
<td>Administrative Monitors (2)</td>
</tr>
<tr>
<td></td>
<td>Technical Proficiency Coordinator (NEW)</td>
</tr>
<tr>
<td></td>
<td>Program Coordinator (NEW)</td>
</tr>
</tbody>
</table>

The two new Coordinator positions will provide capacity and leadership to monitoring efforts. Adding two Field Monitors adds capacity. In addition, the current training and outreach positions will be supported with additional staffing resources for in-progress training (field trainer) and training contracts.

V.8.4 Training and Technical Assistance Approach and Activities

The Training and Technical Assistance Plan is attached and aligns with the PY22 DOE Formula Funding Training and Technical Assistance Plan.

WAP BIL Funding also gives Minnesota an opportunity to pursue a number of additional training and technical assistance initiatives which will build skills in the Minnesota Weatherization Service Provider Network and result in improved services for our clients.

In-Progress Training and Technical Assistance

WAP BIL provides Minnesota the opportunity to develop an In-progress Training and Technical Assistance Program. With the intention of providing, on-demand, in-person, hands-on direction, a qualified field technician and certified QCI will be deployed to interact with auditors, crew, and contractors to advance the work of weatherization.

Provided in a context of learning and in the moment, Minnesota anticipates that this In-Progress Training and Technical Assistance will provide longer and deeper learning for those engaged and avoid monitoring findings and disallowed costs. Perhaps even more valuable, these interactions will result in better weatherization services for our clients.

Technical Assistance Liaison Multifamily
Based on the Solar Technical Assistance Liaison model, Minnesota will engage a multifamily focused Technical Assistance Liaison to guide, educate and support Service Providers as they approach multifamily projects.

Using the plans designed in the *Framework for Effective Leveraging* workshops (see Leveraging Plan), Service Providers will identify their needs in this area and then have the opportunity to connect with the Multifamily Technical Assistance Liaison. The role of the Liaison will include technical mentoring, project management, fund braiding, and process support.

Working with the Liaison will allow Service Providers to increase their ability to address complex multifamily projects, build multifamily experience and skills, and still keep focus on the demands of an increased production schedule.

**Client Education and Outreach Resources and Toolkit**

As outlined in the Leveraging Plan, Minnesota is developing tools to help identify geographic areas and populations that have historically been underserved by the Weatherization Assistance Program. A parallel project is to develop client education and outreach materials so that once we identify the communities we want to engage, we have the tools to do so.

The Client Education and Outreach Resources and Toolkit will build on the successful client education videos Minnesota developed in the last two years by providing materials to both recruit potential candidates and educate those candidates about weatherization, energy conservation, and climate resiliency in their homes.

**Program Analysis**

Minnesota remains interested in demonstrating the value of energy conservation to low-income households but has been limited for a number of reasons associated with data gathering and data management. As outlined below, Minnesota will engage in development of a Program Management Software Tool.

It is anticipated that improved data management will provide an opportunity for additional program analysis around the value of weatherization to the households we serve as well as to the broader community.

**Crawlspace Barrier Pilot and Study**

Minnesota will partner with the University of Minnesota Center for Sustainable Building Research to complete a Crawlspace Ground Moisture Barrier Study with the intention of implementing appropriate practices within the Weatherization Assistance Program.

**Program Management Software Tool**

Minnesota will develop a Program Management Software Tool that will provide our Service Provider network with enhanced ability to manage clients and weatherization jobs, share household files, receive and accept monitoring reports, and submit financial reports among other things.

**Contractor portal**

Minnesota will also develop a centralized Contractor Portal intended to help Service Providers connect with building shell, mechanical, and other contractors. The portal will support adherence to procurement processes while facilitating the connection between weatherization providers and qualified contractors.

**Learning Management Expansion and Customization**

Minnesota will expand our current Learning Management system to further automate and customize training for the unique needs of Service Providers in Minnesota. Accessible to all weatherization staff across the state, the system will be built out to provide simple access, clear learning tracks, and easily trackable results.

**Training Pathways**

The Training Pathways Initiative will build out distinct tracks for various positions within the Service Provider and Contractor network. Managed within the Learning Management System, the Pathways will lay out clear and distinct learning modules within proscribed timeframes intended to provide touchstones as new weatherization staff learn the aspects of their various roles.

Tracks will be designed for auditors but also Weatherization Coordinators, administrative staff, fiscal staff, and even Executive Directors. Each position will have a clear Pathway, with more or less touches dependent on that position’s specific needs.
While Service Providers will continue to do much of the day-to-day hands-on training around local procedures, Minnesota can provide core pieces including history of weatherization, core principals of weatherization, how-to for the energy modeling software, client relations, and braiding of funds.

The Pathways also provide a map of touchpoints over time allowing for reinforcement of key principals and learning objectives across a weatherization staff member’s first year of service. Assessments and check-ins aligned with the Pathways and administered through the Learning Management System also allow for reinforcement of key learnings or for opportunities for revisiting past learnings.

Additional BPI BA, HEP EA and QCI Certification Training

As outlined in the attached Training and Technical Assistance Plan, Minnesota intends to add additional BA, HEP EA and QCI Certification Training to meet the demand resulting from additional WAP BIL Funding.

In the interest of building the workforce as we ramp up to new levels of weatherization, Minnesota would like to shift to a model in which we train individuals both in the network and destined for the network.

To that end, Minnesota will open up the certification classes to staff members in the network. Next our certification classes will be offered to individuals expressing an interest in joining the weatherization network and willing to commit to two year of service with a weatherization provider. Finally, any remaining room in our certification courses will be opened up to other agencies in need of the same certifications. Those organizations would pay for their enrollment which then returns to the weatherization coffers but allows classes to move forward at capacity.

Staffing

As with the Monitoring and Leveraging lanes, Minnesota intends to add new team members to our current training staff.

Current Staff:

Training & Technical Assistance Specialist: Currently funded under DOE Formula Funds, this position exists to provide lead direction for training and technical assistance efforts for the Service Provider Network, provides day-to-day training and technical assistance and coordinates the annual training workplan including budget and reporting.

Senior Training & Outreach Specialist: Currently funded by other sources, this position exists to provide technical policy assistance and training for the MN Weatherization Assistance Program while also serving as a communication liaison, acting as the initial point of contact for service provider inquiries, and coordinating dissemination of recurring communications.

New Positions:

Technical Field Trainer: Included in the WAP BIL budget, the Technical Field Trainer will head up the In-Progress Training and Technical Assistance efforts. Meeting with Service Providers and contractors, this position will walk through the procedures and key principals of weatherization, providing hands-on demonstrations.

Training Contracts Administrator: This position will process the necessary contracts as outlined in this plan and in the budget and WAP BIL Workbook and ascertain that all procurement procedures are followed. This position is funded with non-DOE funding.

Percent of overall trainings

| Comprehensive Trainings: 65.0 |
| Specific Trainings: 35.0 |

Breakdown of T&TA training budget

| Percent of budget allocated to Auditor/QCI trainings: 80.0 |
| Percent of budget allocated to Crew/Installer trainings: 10.0 |
| Percent of budget allocated to Management/Financial trainings: 10.0 |

V.9 Energy Crisis and Disaster Plan

The purpose of the Minnesota Disaster Plan is to allow the WAP program to respond quickly and effectively to disasters that affect the lives and dwellings of
low-income households. This plan reflects the requirements of WPN 12-7 and will be implemented whenever and wherever there is a federal or state disaster designation. For weatherization purposes, a disaster is determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency.

Goal: In the event of a disaster, low-income households often incur the greatest hardship and have the least resources available to assist them in recovery. Minnesota’s WAP goal is to assist eligible households, within the confines of WPN 12-7, in restoring their dwellings to the pre-disaster state.

Household Eligibility: Households in disaster areas must meet the same eligibility criteria as other WAP eligible households. WAP rules (10 CFR 440.16(b)) require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users and households with high energy burdens. It is permissible to consider households located in the disaster area as a priority as long as the households are eligible, meet one of the priorities established in regulation, and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

Dwelling Eligibility: In order for a dwelling to be considered eligible for WAP assistance under this plan it:

- Must be occupied by an eligible household
- Must be in a federal or state designated disaster area, or is located in a county contiguous to the official disaster counties and sustained damage caused by the disaster
- Must be a habitable structure or will be once all work is complete

Either:

- Was an in progress WAP unit at the time of the disaster where already installed materials were damaged or destroyed by the disaster; or
- Was previously weatherized and materials installed with weatherization funds were damaged or destroyed by the disaster.

Priority of Service: Disaster-damaged dwellings will be a priority in designated disaster areas. Both in progress and previously weatherized dwellings are included. This priority designation will last for up to one year, depending upon the circumstances of the disaster, unless determined otherwise by Commerce.

Eligible Activities: The use of USDOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials. All dwellings must have a current energy audit in order to determine which of the following allowed activities are needed and feasible within the parameters of the WAP rules and guidance:

- Securing weatherization materials, tools, equipment, weatherization vehicles or protection of local agency weatherization files, records, and the like during initial phase of disaster response
- The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective
- The cost of eliminating health and safety hazards which is necessary before the installation of weatherization materials
- Removal of previously installed weatherization and/or health and safety materials that are damaged beyond repair and will be replaced as part of the current activity
- Installation of weatherization materials as described in the State Plan and the MN “Allowed Activities and Measure Type Chart”

Service Providers may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the OMB regulations, 2 CFR Part 200.

Work Quality/Inspection: All work must be completed according to the standards contained in the WAP Policy Manual, Standard Work Specifications, and field guides, as well as building, mechanical or other relevant codes. No unit will be counted as complete until all materials are installed in a quality manner and have passed a Quality Control Inspection by Service Provider staff.

Coordination with Other Funds: It is expected that WAP activities will be coordinated with other funded activities to the maximum extent practical. This will not only help make the most prudent and nonduplicative use of all funds but will also help to ensure that service to eligible households will be maximized. However, WAP funds will not be used to supplant other funds such as FEMA and insurance dollars, which must be applied first in renovating disaster-damaged dwellings.

Deferral: Some dwellings may be found to be unsalvageable, uninhabitable, or beyond the scope of the WAP assistance because of a disaster. The Service Provider will carefully evaluate, document, and inform the client in writing of the reasons for the deferral determination.

Required Documentation: Files must contain sufficient documentation to establish the eligibility of the household and dwelling, as well as to justify the work performed, in accordance with Minnesota’s WAP State Plan and WAP Policy Manual. Such documentation includes but is not limited to:

- Household eligibility
- Certification of disaster status (ex: disaster declaration for the household’s county, FEMA letter or habitability document)
- Documentation that all other applicable funds have been used or have been denied prior to the use of WAP funds
Costs/Averages: While exact costs for work in disaster-damaged dwellings are anticipated to run somewhat higher than the state average cost per unit, Commerce will maintain its statewide average at the same level as it would be if there were no disaster completions. Incidental repairs determined necessary that will exceed the $1,000 per unit limit, will be reviewed by Commerce on a case-by-case basis.
Weatherization Grantee
Health and Safety (H&S) Plan

1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

Acronyms/Definitions:

- ECM – energy conservation measure
- IRM – incidental repair measure
- HSM – health and safety measure
- Cost Justified – measure that achieves a savings-to-investment ratio of 1.0 or greater when correctly modeled using the Weatherization Assistant software
- Primary System (or system of units) – system that is most relied upon to provide heating/cooling through the season
- Secondary system/unit – employed only in extreme weather

Minnesota has followed the "House as a System" approach to weatherization since 1990. Both Minnesota and Service Provider staff understand that health and safety concerns are important because, when addressed, the lives of low-income persons served by the program are improved, especially those that are particularly vulnerable such as the elderly, persons with disabilities and children.

Grantees must develop a policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. Each notification must include the occupant(s) (and property owner, if applicable) name and address, be signed and dated by the occupant (and property owner, if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information. Required topics are:

- Occupant Pre-existing or Potential Health Condition Screening
- Documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified.
- Must minimally contain the following: Any known risks associated with the measures and materials being installed
- Subgrantee point of contact information for occupant(s)
- Date of screening

Service Providers must defer a dwelling when the health and safety problems are beyond the scope of weatherization activities. Service Providers evaluate each dwelling individually and make decisions accordingly. Minnesota staff regularly aid Service Providers in problem-solving specific situations, often through use of the Weatherization Inbox. All health and safety problems and their resolutions are documented in individual household files.

Assessments of indoor air quality problems are conducted at the time of the energy audit. Conditions in each dwelling vary greatly, resulting in potential remedies being developed on a case-by-case basis. Possibilities might include ventilation or allowable repairs within the scope of weatherization, client education, and/or referrals to other potential fund sources for work that is outside the scope of the Weatherization Program.

Health and safety issues are addressed at a number of levels throughout Minnesota’s Weatherization Assistance Program (WAP). Minnesota’s WAP Policy Manual is incorporated by reference into all grant contracts with Service Providers. The policy manual is updated regularly to remain compliant with current USDOE rules and guidance and the Minnesota State Plan.

Minnesota conducts a policy training each year to inform all Service Providers of policy changes for the upcoming program year. In addition, any regulatory updates or new test standards are delivered to Service Providers via email.
Minnesota allows Service Providers to budget health and safety costs outside the overall per unit average and monitors statewide averages regularly. Minnesota strives to keep health and safety costs reasonable, recognizing weatherization’s primary goal of energy conservation.

**Pollution Occurrence Insurance:** Minnesota strongly recommends Service Providers carry appropriate Pollution Occurrence Insurance.

**Client/building owner notification:** Minnesota requires that clients and rental property owners be notified in writing in all instances where a health and safety issue is found. This includes but is not limited to the issues listed in the remainder of this Plan. Minnesota developed a standard *Notice of a Safety Problem* form that must be signed by the Service Provider, the client and/or property owner and must be included in the client file. Documentation given to the client and/or property owner must include client name and address, dates of the audit/assessment and when the client was informed of a potential health and safety issue, a clear description of the problem, a statement indicating if or when and under what conditions weatherization could continue, the responsibility of all parties involved, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

**Referrals:** In cases where the scope or cost of needed repairs is beyond the range of the weatherization program, Service Providers refer clients to housing rehabilitation programs and other funding sources wherever possible.

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**2.0 – Budgeting**

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the Grantee’s Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

- Separate H&S Budget ✅
- Contained in Program Operations ❌

---

**3.0 – H&S Expenditure Limits**

Pursuant to, Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g. funding source changes).

10 CFR 440.16(h)(2) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage use the following formula:

\[
\text{Total Average H&S Cost per Unit} = \frac{H&S \text{ budget amount}}{\text{Program Operations budget amount}}
\]

For example, if the ACPU is $5,000 and a Grantee’s Program expends an average of $750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.
15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. **DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18(d)(15)](http://www.gpo.gov/fdsys/pkg/FR-2011-01-03/pdf/2011-7027.pdf), these funds are to be expended by the Program in direct weatherization activities, “of which is necessary before, or because of, installation of weatherization materials.” This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee’s production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee’s annual plan.

**H&S expenditure limits and justification explaining the basis for setting the limits.**

The analysis was conducted using PY20 data. Minnesota is requesting a health and safety average of $1,435.

Minnesota also utilizes LIHEAP funding to pay for health and safety measures. Service Providers are instructed to manage Health and Safety costs between DOE funds and LIHEAP to maintain an appropriate Average H&S Cost Per Unit.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.

![Measure Matrix](Final.xlsx)

**4.0 – INCIDENTAL REPAIR MEASURES**

Any measures that could potentially be identified as H&S but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee’s weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. [10 CFR 440.3](http://www.gpo.gov/fdsys/pkg/FR-2011-01-03/pdf/2011-7027.pdf) defines Incidental Repairs as, “those repairs necessary for the effective performance or preservation of weatherization materials.”

**H&S measures identified and treated as IRMs within your Program.**

Allowable measures are detailed [here](#) in the Allowable Measures Chart found in Appendix C of our MN WAP Policy Manual. This document provides guidance regarding categorizing measures and indicates when designation as incidental repairs is appropriate.

**5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)**
Grantees must include policies/procedures for informing clients of the aspects of weatherization that may put a client with pre-existing health conditions at risk during installation of measures. This screening may occur as part of the initial application for weatherization and/or during the energy audit. Procedures must include what steps will be taken and/or available to the client to ensure that weatherization work will not aggravate pre-existing health conditions. Additionally H&S assessments are required to identify hazards in the home. For those hazards identified, appropriate testing is required when applicable. The client/landlord/property manager must be informed in writing of all testing results, including identification of a hazards revealed by the testing that will lead to deferral/referral.

Grantees are required to develop documentation forms that include at a minimum:

- **Occupant Pre-existing or Potential Health Conditions**;
  - Screen occupant(s) to self-report known or suspected health concerns either as part of initial application for weatherization, during the energy audit, or other parts of the weatherization process as specified;
  - Inform client in writing of any known risks; and
  - Provide client with Subgrantee point of contact information in writing so client can inform of any issues.

- **Hazard Identification Notification Form**
  - The occupant(s) (and Landlord’s, if applicable) name and address;
  - Date(s) of the energy audit/assessment and when the occupant(s) (and Landlord, if applicable) was informed of a potential H&S issue;
  - A clear description of the problem;
  - A statement indicating if, or when weatherization could continue; and
  - The occupant(s) (and Landlord’s, if applicable) signature(s) indicating that they understand and have been informed of their rights and options.

**Procedure for soliciting occupants’ health and safety concerns related to components of their homes**

Weatherization Staff use the Client Participation form to prepare clients for Weatherization Services.

**Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling**

In PY22, Minnesota incorporated the requirement to screen occupants to self-report known or suspected health concerns as part of the weatherization process, including informing clients in writing of any known risks and providing clients with the subgrantee point of contact regarding potential health concerns related to weatherization work.

**Procedure for addressing potential health concerns including pre-existing health conditions when they are identified**

Weatherization Staff will be trained in remediation strategies including options for avoiding blowing insulation in the home or departure of the client from the home. On a case-by-case basis, Minnesota allows temporary relocation for client household members for whom being at home during the course of weatherization work would present a health risk or aggravate a pre-existing health concern. Allowable costs include lodging only. Weatherization is coordinated to minimize the length of relocation. Accommodations provided reasonably reflect the prices and availability of the client household’s community. Lodging receipts and the related health concern noted in the Occupant Pre-existing or Potential health Condition Screening Form are maintained in the HH file.

**Documentation Form(s) have been included for review?**

Yes ☐ No ☑

**Location where forms have been uploaded/submitted**

Separate attachment to SF424 ☑ Separate attachment to H&S Plan ☑

### 6.0 – Health and Safety Categories
For each of the following H&S categories identified by DOE:

- Explain whether you concur with existing guidance from Weatherization Program Notice (WPN) 22-7 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives require comprehensive explanations as to how it meets the intent of DOE guidance.
- Where an action/allowability or testing is “required” or “not allowed” through WPN 22-7, Grantees must concur, or choose to defer all units where the specific category is encountered.
- Any activities that are marked as deferral/referrals must contain the H&S reasons specified within the Master File Section V.1.2 Box 5 Deferral/Referral.
- Unless an alternate funding source(s) is declared, utilize DOE funds to address the particular category.
- Describe the explicit methods to address the specific category.
- Describe in detail what testing protocols (if any) used to assess the particular category.
- Define and quantify minimum thresholds that determine minor, major, and limited definitions and the criteria used to make a determination on a case-by-case basis.
- Define “at-risk” occupant(s) and identify minimum documentation requirements for them.
- Client Education activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.
- Training activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.

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<td>Other Funding Source Addresses H&amp;S Issue ✔</td>
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Procedures for unsafe or non-functioning primary heating/cooling systems
**Heating Systems:**
Primary heating systems (space and water heating plants) are evaluated at the energy audit following current testing protocols, and results are recorded in the client file. Any unsafe or non-functional system is corrected (repaired, replaced, or rendered inoperable) before additional work is requested. If an unsafe primary system cannot be corrected, the dwelling must be deferred. All other heating system work must be completed prior to or in conjunction with building shell work following all testing protocols.

All primary heating systems are first modeled in Weatherization Assistant for replacement as an ECM. If the replacement measure is not cost justified, a clean & tune measure is evaluated. In the case where the replacement/clean & tune measure is either not cost justified or does not correct the unsafe condition, health and safety funds are used to correct the unsafe situation.

Heating plant replacements require a Manual J calculation based on estimated post weatherization housing characteristics.

In cases where unsafe conditions are identified by a crew or contractor during weatherization, such as back drafting or high in-flue or ambient carbon monoxide levels, work that contributes to the unsafe condition will stop immediately and the WAP Service Provider that issued the work will be contacted and informed of the situation. Together, the Service Provider and crew/contractor will take actions to ensure that the dwelling is left in a safe condition.

**Air Conditioning:**
Minnesota includes Air Conditioning systems in its energy modeling. Minnesota does not repair or replace air conditioners as an ECM, except in the case of multifamily buildings. Minnesota does repair or replace air conditioners as a HSM in any of the following situations:
- medical necessity
- leaking component causes a mold hazard
- leaking component could drip onto a heat exchanger of a heating plant

Minnesota does allow repairs to air conditioning components as an IRM when needed to protect heating plant components from water damage.

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**Procedure for unsafe or non-functioning secondary heating systems, including unvented secondary space heaters**

**Heating Systems:**
Secondary heating systems (space and water heating plants) are evaluated at the energy audit following current testing protocols and results are recorded in the client file. Any unsafe system is corrected (repaired, removed, or rendered inoperable) before additional work is called for. If an unsafe secondary system cannot be corrected, the dwelling must be deferred. Replacement of secondary heating systems is not allowed.

**Definition of and documentation required for “at-risk” occupants**
The client must provide a signed letter from a medical doctor that justifies the medical need for air conditioning. Medical conditions requiring air conditioning could include but are not limited to asthma, emphysema, or heart disease.

**Testing protocols**
Required tests are listed in MN WAP Policy Manual 4.5.3 and Appendix D.

For combustion equipment, a visual inspection of the chimney and flue is conducted. For solid fuel appliances, a visual inspection for soot on building assemblies near the unit or flue is conducted.
6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)

Concurrence, Alternative or Deferral

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Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☑ LIHEAP

Asbestos on Heating, Ventilation and Air Conditioning (HVAC) systems, distribution, venting and other small surfaces that will be disturbed through the course of weatherization work policy

Space heating systems in single or multi-family dwellings may have components that contain asbestos such as duct and boiler pipe wrap or parts of the heating plant itself. Testing to determine if a material is an ACM is an allowable health and safety expense as is the encapsulation or removal of an ACM under the following conditions:

- At any point during the WAP process, if the ACM is friable, it must be encapsulated or removed prior to the resumption of work or blower door testing by a Minnesota Department of Health certified professional, in accordance with the Asbestos Hazard Emergency Response Act (AHERA).

- If the ACM is intact (not friable) but will be disturbed as part of the WAP work (i.e. duct sealing or heating plant replacement) it must be encapsulated or removed by a Minnesota Department of Health certified professional in accordance with the Asbestos Hazard Emergency Response Act (AHERA).

Any additional asbestos removal may not proceed without Minnesota approval.

In the cases above, the clients are provided with asbestos safety information and are instructed not to disturb the suspected asbestos containing material.

Asbestos in attics, walls, floors roofs and foundations that will be disturbed through the course of weatherization work policy

Service Provider and contractors will take reasonable and necessary precautions to prevent asbestos contamination in the home. The general abatement of asbestos siding or replacement with new siding is not an allowable HSM. All WAP workers that are removing or reinstalling asbestos siding will follow all working safety protocols as detailed in the SWS.

1-4 Unit dwelling: Asbestos siding, commonly called slate or Transite siding, is assumed to be an ACM unless testing determines otherwise. The presence of slate siding that is in good condition does not prevent the installation of dense packed insulation. To insulate walls in dwellings where asbestos-containing siding is present, the siding must be removed in a manner that allows the siding to remain as intact as possible.

Drilling asbestos-containing siding is not allowed. WAP installers are allowed to remove asbestos-containing siding as long as asbestos-safe work practices are performed when doing so. The cost of removal and reinstallation of slate siding can be included in the associate ECM.

After the walls have been insulated, the siding must be reinstalled in a manner that allows the siding to remain as intact as possible. Keeping asbestos-containing siding intact greatly reduces a health risk to workers or clients. Chipped, cracked or brittle asbestos-containing siding may require that walls be insulated from the interior of the dwelling.

5+ Unit dwelling: Dwellings with five or more units fall under EPA asbestos regulations, which have more stringent requirements governing removal. EPA asbestos regulations apply to structures or dwellings used for, or once used for, commercial purposes. Removal of siding from these structures may be allowed once the applicable standards are determined and applied. If removal of asbestos-containing siding is not necessary, other weatherization measures may be applied to these structures.
Vermiculite that will be disturbed through the course of weatherization work policy

Vermiculite insulation in attics is assumed to be contaminated with asbestos fibers. The Asbestos Containing Material (ACM) test that is utilized for contiguous materials such as heating chamber liners and pipe wrap is not designed to work with a material that is contaminated by friable asbestos, as is the case with vermiculite. Therefore, Minnesota does not require Service Providers to test vermiculite.

When vermiculite is present within a home Service Providers may choose from the following courses of actions:

- Defer the home.
- Utilize non-DOE funds as available to hire a contractor certified by the Minnesota Department of Health (MDH) to remove the vermiculite from the home. The contractor must obtain a permit from MDH and all work must be done in accordance with MDH asbestos removal protocols. As the MDH only regulates asbestos removal that has tested positive according to the ACM test mentioned above, Minnesota requires that all abatement of vermiculite being conducted with non-DOE funds be done so, assuming the vermiculite is positive for asbestos according to the ACM test.

Addition notes on vermiculite:

- The cost for removal of vermiculite insulation is not allowed using DOE funds.
- When deferral is necessary due to the presence of vermiculite, and the homeowner has the vermiculite removed, the homeowner must provide documentation that a MDH certified professional performed the remediation before weatherization work continues.
- All WAP workers operating in areas with vermiculite will follow all safety protocols as detailed in the SWS. The cost of removal is not allowed using DOE funds.
- DOE funds may be used for testing by a MDH certified professional.
- Once asbestos is properly removed, a previously deferred home can be weatherized.

Blower door testing policy when asbestos/vermiculite is present

Positive pressure blower door testing will be used when vermiculite insulation is present. When a material within the pressure boundary of the dwelling (other than vermiculite) is suspected of being an ACM and is friable, blower door testing is not allowed until the friable material is either confirmed to be a non-ACM or it has been encapsulated or removed in accordance with all applicable rules.

Testing protocols

A visual inspection of exterior wall surface and subsurface, floors, walls, and ceiling for suspected ACM is conducted during the energy audit and again prior to drilling or cutting.

In dwellings, which contain vermiculite insulation, all vermiculite insulation is assumed to contain asbestos.

Weatherization of a dwelling containing vermiculite may only proceed if an MDH certified contractor removes the vermiculite and the work is done assuming the material is an Asbestos Containing Material.

Documentation requirements

Safety Assessment Form, MDH Certificate, Photographs

6.3 – Biologicals and Unsanitary Conditions

(e.g., odors, mustiness, bacteria, viruses, raw sewage, rotting wood)

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Biological and unsanitary conditions in dwellings policy
Service Providers are continually alert to potential and actual problems with biological contaminants such as mold, moisture, and rotting wood. Each energy audit contains a sensory assessment of these issues with photos and other documentation such as moisture meter readings, as needed. Auditors and inspectors are trained to identify mold and moisture problems. The presence of large amounts of mold or mildew are grounds for deferral. Service Providers are encouraged to contact Minnesota in situations where mold is present in more than isolated areas or where a moisture source is not apparent. Work may proceed in cases where there is a small amount of mold or mildew where the source can be determined and, in the judgement of the service provider staff, can be addressed through a combination of controlling the moisture source and the addition of ventilation (ASHRAE 62.2-2016). Testing for mold, mildew or other biological contaminants or the cleaning of mold are not allowed USDOE expenses. Instructions on general cleaning of small amounts of mold can be provided to the homeowner.

Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed as an HSM or IRM within Minnesota prescribed requirements noted on the most current version of the Allowable Measures Chart and cost averages or limits.

Remediation of odors, viruses or bacteria problems is beyond the scope of weatherization and is not allowed. If a known agent in a dwelling may create a serious risk to occupants or weatherization workers, then deferral may be necessary.

Limited cleaning of the workspace to protect the health and safety of workers and occupants is allowed.

In addition, weatherization installers and contractors are also alert to the possibility that biological contaminant issues, not evident at the time of the energy audit, could arise in the course of installing weatherization materials. If post-audit problems are discovered, crews and contractors are required to notify Service Provider staff to determine if weatherization work can continue.

Basements and crawlsspaces can be a source of potential biological contaminants. Auditors are trained to identify and evaluate how best to address each situation and determine allowable measures to address situations or recommend deferral for cases outside the scope of the program.

- Crawlspacesthat are physically connected to a building but not within the pressure boundary as determined by pressure diagnostics are not part of the house as a system. Examples include:
  - Foundation under a small entryway
  - Cantilevered floor with vented skirting (site built or mobile home).

- Accessible basements and crawlsspaces within the pressure boundary shall have all exposed soil and sump systems covered in accordance with the SWS. The home will have ventilation installed to meet the ASHRAE 62.2 standard. Auditors will evaluate any grading or drainage issues that may cause bulk moisture to enter the home and call for mitigation within allowed measures and cost limits as noted on the allowable measures chart.

### Testing protocols
Sensory inspection as part of the energy audit, moisture meter testing as needed.

### 6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

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### Structural issues in dwellings policy
As part of the energy audit, a visual assessment of any roofing and/or structural problems along with photos and other documentation is needed. Repairs are allowed in order to protect the safety of clients and installers both during and after the weatherization process. Repairs must be allowable Incidental Repairs as defined by WPN 19-5 and be within the cost limitations as defined by the current DOE state plan.

Dwellings in need of rehabilitation beyond the scope and cost limits of weatherization are referred to other programs and funding sources. Weatherization activities are either deferred until rehabilitation activities are complete or, in some instances, are completed simultaneously with rehabilitation activities.

Define and quantify minor or allowable structure and roofing issues. At what point are these considered beyond the scope of weatherization?

Repairs are beyond the scope of weatherization if they involve:
- More than 100 square feet of missing sheetrock.
- Roofing or structural repairs that exceed $400 in material and labor to correct.

If priority lists are used and these repairs are designated as IRMs, at what point is a site-specific electronic energy audit required?

Not applicable.

### 6.5 – Code Compliance

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**Code compliance issues in dwellings policy**

All weatherization work in Minnesota is required to be completed to the standard contained in the applicable code. This applies in places where codes are actively enforced and as a work standard where code enforcement is lacking. Service Provider staff and contractors are expected to be aware of health and safety issues associated with building codes. Correction of pre-existing code compliance issues is not an allowable expense other than where weatherization measures are being conducted. In these situations, the specific code triggering the work must be documented in the client file. State codes must be followed when installing WAP measures.

### 6.6 – Combustion Gases

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**Combustion gas issues discovered during testing, including those that require an immediate response policy**

In cases where unsafe conditions such as back drafting or high in-flue or ambient carbon monoxide levels are identified by a crew or contractor during the course of weatherization, work that will contribute to the unsafe condition will stop immediately and the Service Provider that issued the work will be contacted and informed of the situation. Together the Service Provider and crew/contractor will take actions to ensure that the dwelling is left in safe condition.
Testing protocols

Testing of combustion appliances, including heating plants, water heaters, ovens (excluding burners, visual inspection only), and space heaters, is required during the energy audit. Acceptable test procedures are included in the current Minnesota Field Guide, the Minnesota Policy Manual, and supplemental documents that can be found on the Department of Commerce website. The policy manual, field guide, and supplements provide standards that must be met before weatherization can proceed.

The Minnesota Policy Manual requires that naturally drafting appliances are tested for spillage under worse case Combustion Appliance Zone (CAZ) conditions and are verified to be operating safely before and after any weatherization activities that change the pressure balance in the dwelling, such as: air sealing, increasing exhaust ventilation, duct sealing, insulating, etc. Mechanical work must be completed before or in conjunction with air sealing/insulation work. In extreme cases, a family may be asked to leave the dwelling until a problem is remedied. USDOE funds cannot cover costs for temporary relocation in these instances.

Minnesota also requires the measurement and recording of the pressure in the CAZ under worst-case conditions. This information is collected as part of the worst-case CAZ spillage test. The worst-case CAZ pressure is compared to the CAZ limit defined in the SWS for each appliance. Measured CAZ pressures that exceed the CAZ limit may, depending on the situation, require action to correct. Minnesota has developed a detailed procedural document with the help of local building science experts to help guide field staff through the decision-making process around health and safety remediation of CAZ and spillage issues.

As part of the worst-case CAZ test the effect of unsealed return ducts is measured. In cases where return ducts inside the thermal boundary on single-family homes causes a negative pressure, action will be taken to reduce the negative pressure. This is typically done through duct sealing or relief venting between the CAZ and the rest of the house.

Duct sealing within the thermal boundary will be to remediate depressurization concerns.

In addition, an inspection of the venting for all combustion appliances is conducted. All combustion appliances designed to be vented must be properly vented to the outside. When testing indicates an issue with the venting, it will be corrected in accordance with the SWS. If unsafe conditions, whose remediation is necessary to perform weatherization, cannot be remedied by repair or tuning, replacement is an allowable H&S measure. In cases where both repair and replacement are an option, a cost comparison of the options will be included in the client file.

When all weatherization activities are completed, testing is repeated at final inspection. Tests performed at the audit and the final inspection include carbon monoxide in the flue, worst case CAZ spillage, CAZ pressure, and fuel leaks. Every dwelling must pass a worst-case CAZ spillage test during the energy audit, before the installers begin work, daily while completing work, once installers complete work, and again at final inspection.

### 6.7 – Electrical

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**Electrical hazards, including knob & tube wiring, in dwellings policy**
**Electrical – Other Than Knob and Tube:** Weatherization audits in Minnesota assess and document electrical hazards, especially as they pertain to weatherization activities. Both the policy manual and the field guide contain information on how to identify and address electrical issues. Wires are inspected to ensure that they are not bare or frayed. Service boxes are inspected to ensure that they have secure covers.

Correcting general electrical wiring problems is generally not an allowable weatherization measure. However, instances where electrical issues are directly related to the weatherization process, health and safety funds may be used for repairs. If it is determined that a hazardous situation exists, the problem is corrected before weatherization work commences. If a hazardous situation is discovered during weatherization work, all work must cease until the hazardous situation is corrected.

If repairs are beyond the scope of the weatherization program to address, Service Providers refer clients to rehabilitation programs and other fund sources where possible. A licensed electrical contractor must perform any electrical work needed to correct a problem.

**Electrical – Knob and Tube:** Minnesota uses health and safety dollars to address knob and tube wiring when it has a direct impact on weatherization activities. Any insulation activities completed where knob and tube wiring is present must conform to applicable codes. Knob and tube wiring repair/replacement in attics and walls is completed before insulation activities begin. In consultation with the Minnesota Board of Electricity, the following protocol has been developed:

- Service Providers must verify if the knob and tube system is in service before proceeding with any additional measures.
- Service Providers must inspect the wiring that will be covered to determine the type(s) of wiring present, the circuit protection, wiring condition, and to identify any other hazards.
- Service Providers must obtain permission from the homeowner or authorized agent to install proper over-current protection. If permission is not given, insulation cannot be installed.
- Install insulation only as follows:
  - In those areas where knob and tube wiring is active, circuits must be protected by properly sized over-current protection;
  - Insulation is to be placed up to a depth of two inches from the underside of the knob and tube wiring, provided that an open-air space is permanently maintained above such wires; OR
  - Barriers must be installed in such a manner around knob and tube wiring to ensure that the insulation shall not directly cover the wiring, and an adequate air space of at least one inch on all sides is maintained.
  - Document whether sidewall cavities are insulated. Sidewalls containing live knob and tube wiring are not allowed to be insulated.
- When knob and tube wiring is replaced, it must be done in accordance with all state building codes and statutes.

The presence of knob and tube wiring may dictate that some insulation activities may not be completed. Clients receive education on the dangers and implications of knob and tube wiring in their homes. If knob and tube repairs or replacements are beyond the scope of the weatherization program to address, Service Providers refer clients to rehabilitation programs and other funding sources as feasible.

**Define and quantify minor electrical issues. At what point are these considered beyond the scope of weatherization?**

Service providers may make minor repairs to correct hazardous situations for items up to $800 in labor and materials for non-knob and tube electrical work without Minnesota approval. In cases where the non-knob and tube electrical hazard is greater than $800, Minnesota approval is required. Minnesota will consider these situations on a case-by-case basis. Factors considered are total cost, total energy savings of the WAP activities, location of the hazard, status of WAP activities, etc.

Knob and tube replacement in areas where insulation is being installed is allowable. The cost is first considered an IRM when the replacement protects an installed ECM or ensures the effectiveness of an installed ECM. Replacement is considered an HSM measure only if no funds are available for an IRM and it directly poses a health and safety risk to the workers or occupants.
If priority lists are used and these repairs are designated as IRMs, at what point is a site-specific electronic energy audit required?

Not applicable.

6.8 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants

Concurrence, Alternative or Deferral/Referral

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Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☑ LIHEAP

Formaldehyde, VOCs, flammable liquids and other air pollutants in dwellings policy

Describe Guidance Provided To Subgrantees Here

Removal of pollutants is allowed and is required if they pose a risk to workers. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.

Fire Hazards: All energy audits include an assessment of fire hazards within the dwelling. This assessment may include, but is not limited to, clearances to combustibles, creosote build-up, and storage of flammable materials in proximity to combustion appliances.

Resolution of these types of hazards may include health and safety measures before or during weatherization activities, depending on the nature and severity of the problem. Clients are educated and informed in writing by all Weatherization staff and workers about potential hazards. Inspectors and auditors are trained on fire hazards.

VOCs: Volatile Organic Compounds (VOCs) are widely used as ingredients in many household products, such as paints, varnishes, fuels, and many cleaning, disinfecting, cosmetic, and hobby products. These products can release organic compounds as vapor when they are used and, to some extent, when they are stored.

Formaldehyde is a volatile organic compound found in many building materials and household products, such as new carpets and plywood. These products release organic compounds over time. Organic compounds sometimes have adverse health effects on people. At this time, Minnesota does not allow the removal of materials deemed to contain excessive amounts of VOCs. Because of the potential adverse health effects, local Service Providers must take this into consideration when air-sealing and when deciding on the need for ventilation. Clients must be informed and educated about this potential health issue. If it is not possible to control the VOCs, weatherization work must be deferred. Testing for VOCs is not allowed using DOE funds.

None

6.9 – Fuel Leaks (please indicate specific fuel type if policy differs by type)

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Unallowable Measure ☐

Fuel leak remediation protocols

Fuel leak testing is a required part of all energy audits and QCI inspection. When a minor gas leak is found on the utility side of service, the utility must be contacted before work may proceed. Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before additional weatherization measures are installed.

At what point are fuel leaks considered beyond the scope of weatherization?
Fuel leak repairs that are accessible are an allowable expense. If the leak requires opening a closed building assembly, such as a wall cavity, it is beyond the scope of weatherization and would result in a deferral.

**Testing protocols**

Minnesota follows the combustion gas detection protocols from BPI 1200.

### 6.10 – Gas Range/Ovens

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**Unsafe gas range/ovens policy**

Ovens are tested at the audit in accordance with the current BPI standards and include a combustion test of the oven, a visual inspection of the burners, and gas leak detection where gas lines are accessible. Service or repair is allowable when CO limits are exceeded as detailed in the MN Field Guide. Testing of stovetop burners is no longer allowed. Replacement of stoves is not an allowable DOE expense.

**Testing protocols**


### 6.11 – Hazardous Materials Disposal [e.g., Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.] (please indicate where policy differs by material)

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**Hazardous materials disposal policy (existing material/appliance and hazardous material)**

When hazardous materials (refrigerant, mercury thermostats, lead paint dust/chips, etc.) are generated in the course of weatherization work, proper disposal is required, and removal/disposal costs must be included. Refer to lead and asbestos sections for more information on those topics.

Limited removal of hazardous materials for the protection of workers is required. Limited removal of hazardous materials for the protection of occupants is allowed.

**Refrigerant Issues:** Refrigerator replacements may be completed using USDOE funds. The cost of disposal of the appliance (including refrigerant) may be included in the replacement measure providing it does not drop the measure SIR below one. If the replacement measure SIR drops below one, the cost of reclaiming the refrigerant may be covered as a health and safety cost. Refrigeration appliances that are replaced must be disposed of according to the environmental standards in the Clean Air Act (1990), Section 608, as amended by the Final Rule, 40 CFR 82, May 14, 1993. The party recovering the refrigerant must possess an EPA-approved Section 608 Type II license or an approved universal certification. Clients should be cautioned not to disturb refrigerant.

**Documentation requirements**

None

### 6.12 – Injury Prevention of Occupants and Weatherization Workers

(e.g., repairing stairs and replacing handrails)
Concurrence, Alternative or Deferral/Referral

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Injury prevention measure(s) policy

Service Provider staff is instructed to be alert to any possible client health issues relevant to a broad range of potential weatherization activities. Energy auditors are the primary staff responsible for identifying such issues, either as a part of the actual energy audit or through required interviews with household members. Because these issues may also arise when they are in the dwelling, installers are also trained to identify health and safety issues. Once an issue is identified, Service Provider staff works with the client to address the hazard either directly through the allowable weatherization activities, referrals, or deferral of work. All issues and efforts to resolve them must be documented in the household file and must include a client signature.

In some instances, uncorrected hazards could result in injury to weatherization workers or preclude the completion of weatherization measures. In these instances, Service Providers are allowed to make repairs with incidental repair dollars to enable weatherization activities to be completed, provided they are within the Allowable Measures Chart and within required cost limits. Photos and other documentation of the hazard are required.

Crew/Contractor Health and Safety: The Minnesota Field Guide is incorporated by reference into all Service Provider weatherization contracts with Minnesota. The field guide is SWS-aligned and describes Service Provider responsibilities for staff and contractors. The guides address common worker safety issues including vehicle safety, falls, back injuries (proper lifting procedures), exposure to hazardous materials, electrical hazards, repetitive stress injuries, and the use of personal protective gear.

The field guide language requires that local Service Providers and their installers comply with OSHA rules pertaining to worker safety. Service Providers are also required to provide annual training for their crews, auditors, and contractors in all worker and weatherization-related health/safety topics including OSHA 10, HAZCOM 2012, and Confined Spaces training, so that they understand and meet the rules and regulations of the USDOE WAP. Or they may alternatively send them to state-based training to meet this requirement.

Define and quantify minor or allowable injury prevention measures. At what point are these considered beyond the scope of weatherization?

Allowable measures are detailed in the Allowable Measure Chart in appendix C of the Minnesota Policy Manual. Minor is defined as work up to $400 in labor and materials.

6.13 – Lead Based Surface Coverings

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Lead safe work protocols

Appropriate containment and clean up procedures must be used to protect occupants from lead-based surface covering hazards while weatherization work is in progress. Proper notification of the existence of these hazards must be provided to the occupants. Minnesota will verify lead safe containment through photos or on-site monitoring.

When weatherization work is in progress the following steps must be followed, as referenced in WPN 22-7:
- Renovations must be completed by Certified Renovation firms.
- Crews and contractors must use containment procedures to ensure protection of the occupants.
- Occupants, especially young children or pregnant women may not enter the work site.
• Occupants are allowed to return only after the work is completed and the dwelling has passed a visual inspection or a wipe test, if applicable.
• Occupants’ belongings must be protected from lead contamination.
• The work site must be set up to prevent the spread of lead dust and debris.
• Warning signs must be posted at entrances to the worksite when occupants are present; at the main and secondary entrances to the building; and at exterior work sites. The signs must be readable from 20 feet from the edge of the worksite. Signs should be in the occupants’ primary language, when practical.
• The work area must be contained.
• If containment cannot be achieved with occupants in the unit, occupants must move out of the unit or the work must be deferred until containment can be achieved. Minnesota does not use USDOE funds for temporary relocation of clients.
• Measures to ensure that containment procedures do not interfere with occupant and worker egress in the case of an emergency must be established.
• Photos of lead safe work containment procedures and other documentation are required in all dwellings where lead safe work practices are used.

Containment procedures must ensure that any dust or debris will not be spread beyond the work area to non-work areas. The level of containment must be determined by the auditor/inspector or supervisor before work is assigned to a crew or contractor. The level of containment is based on the hazards present, the age of the home, the scope of work activities, and any customer health issues. Lead safe work generally falls into two levels of containment: Level 1 and Level 2 containment and their related standards are outlined in WPN 22-7.

Level 1 containment is required in pre-1978 homes when less than 6 ft² of interior painted surface per room, or 20 ft² of exterior painted surface will be disturbed. Level 1 containment consists of methods that prevent dust generation and contains all debris generated during the work process. The containment establishes the work area that must be kept secure. Measures that may fall within this guideline include:

• Installing or replacing a thermostat
• Drilling and patching test holes
• Replacing HEPA filters and cleaning HEPA vacuums
• Changing a furnace filter
• Removing caulk or window putty (interior)
• Removing caulk or window putty (exterior)
• Removing weather-stripping

Level 2 containment is required when Weatherization activities will disturb more than 6 ft² of interior surface per room, or 20 ft² of exterior surfaces in homes built prior to 1978. Level 2 containment consists of methods that define a work area that will not allow any dust or debris from that work area to spread. Level 2 containment requires the covering of all horizontal surfaces, constructing barrier walls, sealing doorways, covering HVAC registers with approved materials, and closing windows to prevent the spread of dust and debris.

Measures requiring Level 2 containment may include:
• Drilling holes in interior walls
• Drilling holes in exterior walls
• Removing siding
• Cutting attic access into ceiling or knee walls
• Planing a door in place
• Replacing door jambs and thresholds
• Replacing windows or doors
• Furnace replacements
Level 2 containment must always be used where any of the following is conducted, even if the activities will disturb less than the minimum hazard levels within the Level 1 category:
- Window replacement
- Demolition of painted surfaces

Proper lead safe work clean-up and disposal of debris is required to adequately clean up the job site. All dust, dirt, material scraps, containers, wrappers, and work-related debris must be removed from the client’s home. A HEPA vacuum must be used to clean up the work areas. Further cleaning may be necessary, based on the hazard. Disposal of debris must meet federal, state, and local regulations.

A visual inspection by the crew or contractor must be completed to ensure that the cleaning process is complete. Clearance must be achieved in accordance with RRP rules. Verification is conducted by the QCI at the time of final inspection of the weatherization work. If debris, paint, or surface covering chips, or dust is observed, the weatherization crew or contractor must repeat the cleaning process. Client files will contain lead testing documentation, a description of lead work done, the certified renovator certificate, photos of lead safe containment and setup, and any training offered on site. In cases where extensive lead testing will take place to determine whether lead-based paint or surface covering is present, an analysis of the economic feasibility will be conducted by the Service Provider.

### Testing protocols

- EPA approved lead testing

### Documentation requirements

Notification of a lead hazard must be given to all clients in dwellings that come under the LSW/RRP guidance. All agencies must give each client the lead notification publication, "Renovate Right – Important Lead Hazard Information for Families, Child Care Providers and Schools." A signed certification of receipt of this notice must be present in the client file.

### 6.14 – Mold and Moisture

(e.g., drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers)

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### Moisture related issues in dwellings policy

**Drainage:** DOE funds may be used to remedy moisture issues resolved by repair or replacement of gutters, downspouts, grading, flashing, or sump pumps, where the total cost is less than $400. Drainage issues above that cost are beyond the scope of the Weatherization Assistance Program. Homes with such conditions may create a serious health problem and work must be deferred until these issues are addressed by the client or by other funding sources. Clients are notified of such problems in writing.

**Mold and Moisture:** An indoor air quality problem is excess moisture or humidity in a home. Too much moisture may result in moisture penetration, condensation, and build-up in walls and ceilings. Moisture accumulation may also cause wood rot. Too much indoor moisture or humidity can also lead to the growth of mold and mildew which can cause adverse health effects for the occupants. Energy auditors use the following to identify potential moisture problems when assessing a client’s home:
- Damp atmosphere or a musty smell in the dwelling, basement, or crawlspace
- Client complaints of allergy-like symptoms
- Mold growth on walls and ceilings, especially in bathrooms and kitchens
- Mold growth on attic roof sheathing
- Signs of condensation on walls or windows
• Water damage or mold on the underside of roof decking
• Evidence of crawlspace moisture
• Rusted metal in basements, crawlspaces, bathrooms and/or kitchens
• Efflorescence (white, powdery deposits) on concrete or masonry surfaces
• Water stains on foundation walls

Although the entire dwelling is inspected for mold, particular attention is paid to the following areas: bathrooms, kitchens, laundry areas, basement walls, ceilings next to exterior walls, attics, and crawlspaces. The mold assessment, completed in tandem with the moisture assessment, is performed by the auditor.

Auditors document the presence of visible mold. Details are filed in the client file. The existence of mold is documented to confirm that mold was pre-existing and that weatherization activities were not the cause of mold growth.

When a moisture problem is identified, energy auditors determine the source of the problem and outline solutions or generate specific work order measures to mitigate the problem.

Energy auditors inform clients of any mold that is found and of its location. Auditors explain to clients that the auditor is not a mold expert and that the mold assessment was a visual assessment only and that no testing for mold was completed. Auditors use forms provided by Minnesota and the WA software to document and generate specific health and safety measures that address or alleviate moisture problems. Whole Dwelling, Equipment, and Building Shell tabs within WA detail 41 individual remedies, all addressing health and safety concerns. Many of these concerns are related to moisture issues.

Identifying and solving the source of moisture problems is the first priority when a problem is discovered. The following are possible solutions to moisture problems:

Mechanical Ventilation. One of the main strategies for solving moisture problems in a home is mechanical ventilation. Installing intermittent or continuous ventilation is allowed and may be paid for with health and safety funds. Moisture problems may be reduced or eliminated by ventilating areas that routinely generate large moisture loads such as bathrooms, kitchens, and laundry areas. Minnesota requires Service Providers to implement ASHRAE 62.2-2016 on all dwellings weatherized, effective July 1, 2017. Clients are reminded of the importance of using kitchen exhaust fans while cooking and using bathroom exhaust fans after showers or baths. Clients are instructed how to operate the fans properly.

• Plumbing/Sewer Repairs. Leaking water pipes and sewer lines cause moisture and pose serious health problems for affected dwellings. Auditors carefully note any problems. Minor repairs, costing less than $400 related to plumbing and sewer repairs, may be completed as a part of the weatherization process, provided the repairs are necessary to weatherize the home. Referrals are made to non-weatherization resources that may assist the household in making more substantial repairs to pipes or sewer lines. Cleanup of any unsanitary conditions due to plumbing leaks is the responsibility of the client.

• Attic Bypass Sealing. Attic bypass sealing must be completed on all homes, with the exception of homes that have vermiculite insulation present in the attic. One of the most important benefits of attic bypass sealing is that it prevents the migration of moisture into the attic where it could cause ice dams, wood rot, and mold growth. Pressure diagnostic measurements are taken on both a ‘pre’ and ‘post’ basis to ensure and measure bypass-sealing effectiveness. Bypass sealing is completed as an air-sealing measure when it achieves an SIR of one or more.

• Health and safety funds are used only in dwellings where necessary bypass sealing has an SIR of less than one.

• Crawlspace Ground Moisture Barriers. Crawlspace moisture can lead to condensation, mold, and rot. Air passing through the soil can contain radon and pesticides. It is important to prevent moisture, radon, and other soil gasses from entering the dwelling. This is accomplished by covering the accessible crawlspace ground with a vapor barrier with a perm rating of less than 0.1. This vapor...
barrier must be installed continuously over the top of the exposed soil with all seams and penetrations sealed to establish a continuous air barrier to seal out water vapor and soil gasses.

• Bulk Water Control. Health and Safety dollars may be used to make repairs to deteriorated roofs and other framing members where such repairs are needed to eliminate or prevent moisture or water from entering the dwelling. These repairs are allowed when necessary to address moisture sources that create health/safety hazards in the dwelling. Doors, window sash or total window replacements are not allowable health and safety activities.

Limited Water Damage Repair: Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary to weatherize the home and to ensure the long-term stability and durability of the measures.

Mold Remediation: Controlling moisture is critical to controlling mold. If mold is found in a home, it is likely the result of moisture, excessive humidity, or water intrusion. Moisture problems must be solved before any mold problem is addressed. If the auditor determines that moisture problems can be solved satisfactorily, the Service Provider may determine that the mold will not be disturbed by weatherization activities and work may proceed without the need for remediating the mold.

The Service Provider may defer any work on the home until the mold is remediated by the client or property owner. This policy is recommended if there are large areas of mold growth. If the auditor determines the moisture problem cannot be satisfactorily eliminated, weatherization work must be deferred.

Mold Clean-up Information and Referral: If the weatherization work can be completed without disturbing mold/mildew, or if cleanup is not required, work may be completed at the discretion of the auditor or program manager. If cleanup is required, information on cleanup procedures will be provided to the client. Information sources for mold clean up include but are not limited to the University of Minnesota Extension Service, FEMA, Minnesota Department of Health, and Canada Mortgage and Housing Corporation.

Procedures are designed to protect the health of the occupants and cleanup personnel during remediation.

Define and quantify minor or allowable moisture-related measures. At what point are these considered beyond the scope of weatherization?

See Sections above

### 6.15 – Pests

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Unallowable Measure with DOE Funding | □ | Other Funding Source Addresses H&S Issue | ☑ LIHEAP

Pests and pest intrusion prevention policy

Pest removal is allowed only where infestation would prevent weatherization. Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.

In cases where a pest issue is seasonal, Service Providers are encouraged to defer weatherization until the problem can be resolved. Example: Stinging insects are not active in colder weather so weatherization may be deferred until after temperatures are consistently at or below freezing if stinging insects are found.

If there is a menacing domestic animal in a dwelling or if the worker is uncomfortable around the animal, weatherization workers may require the client to restrain the animal before proceeding with weatherization. If the client refuses, weatherization workers may document the situation and defer the work until the situation is resolved.
Animal bites should be immediately responded to and reported. If necessary, workers should seek medical care. If a worker is bitten by a bat, an attempt should be made to kill the bat without destroying the head. The bat should be placed in plastic and shipped to a local lab to test for rabies.

**Define and quantify pest infestation thresholds. At what point are these considered Beyond the scope of weatherization**

Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where removal costs exceed $400.

### 6.16 – Radon

**Concurrence, Alternative or Deferral/Referral**

- Concurrency with DOE Guidance ☑
- Alternative Guidance ☐
- Results in Deferral/Referral ☐
- Unallowable Measure with DOE Funding ☐
- Other Funding Source Addresses H&S Issue ☑
- Enter Funding Source ☑

**Procedure for radon in dwellings**

Radon mitigation is not an allowable health and safety cost. Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file. In homes where radon may be present, work scope must include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades, to reduce the possibility of making radon issues worse where feasible. Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealant at all seams, walls, and penetrations. Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, including open sump pits, isolating the basement from the conditioned space, and ensuring crawl space venting is in place or installed. Radon assessments are not part of weatherization in Minnesota. Dwellings with previously identified radon problems should not be left with an increased negative pressure in the contaminated area after weatherization work. Vapor barriers are installed in dwellings with accessible crawlspaces where there is exposed soil.

**Testing protocols**

Not applicable

**Documentation requirements**

Client informed consent form is required on all houses.

### 6.17 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

**Concurrence, Alternative or Deferral/Referral**

- Concurrency with DOE Guidance ☑
- Alternative Guidance ☐
- Results in Deferral/Referral ☐
- Unallowable Measure with DOE Funding ☐
- Other Funding Source Addresses H&S Issue ☑
- LIHEAP ☑

**Installation or replacement policy for the following safety devices:**

**Smoke Alarms:** Installation of individual or combination smoke and CO detectors and/or alarms is required when absent, inoperable or expired. Replacement of operable non-expired units is not allowed. Service Providers are required to meet State and local fire codes for the number and placement of installed units.

**Carbon Monoxide Alarms:** CO alarms must be installed where alarms are not present or are inoperable.

**Fire Extinguishers:** Installation allowed only in cases where solid fuel is burned as part of the primary heating system.

**Testing protocols**

Units are tested at energy audit by pressing the test button.

### 6.18 – Ventilation and Indoor Air Quality

**Concurrence, Alternative or Deferral/Referral**

- Concurrency with DOE Guidance ☑
- Alternative Guidance ☐
- Results in Deferral/Referral ☐
**Version of American Society of Heating Refrigeration and Air-conditioning Engineers (ASHRAE) 62.2 Implemented (optional: identify Addenda used)**

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**Procedures for complying with implemented ASHRAE standard**

Exhaust fan flow rates are measured at the energy audit and during the QCI inspection. Required tests are detailed in Appendix D of the WAP Policy Manual. The continuous flow setting at the QCI is based on the actual final blower door results. Room to room pressure tests are conducted and action to relieve pressure is taken when the pressure differential between a room and the house is greater than 3 pa.

**Testing protocols**

Exhaust fan flow rates testing is required to verify compliance with ASHRAE 62.2 standard.

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### 6.19 – Window Repair, Door Repair

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**Window repair and door repair H&S policy**

Window and door replacement, repair, or installation is generally not an allowable health and safety expense. Per WPN 19-5, window and door repairs are allowable H&S expenses to resolve a bulk water intrusion issue that is the cause of visible biological growth.

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### 6.20 – Worker Safety (e.g., OSHA)

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**Federal, state and local worker safety requirements policy**

Minnesota Service Providers must comply with OSHA (29 CFR 1910 and 1926) regulations, local health and safety plans, and use of Material Safety Data Sheets. Minnesota currently performs monitoring for OSHA rules and regulations, as it pertains to the SWS, when performing monitoring on in-progress units.
TRAINING AND TECHNICAL ASSISTANCE (T&TA) PLAN

1.0 – GENERAL INFORMATION

Comments that do not generally fit into the available tables below

TRAINING AND TECHNICAL ASSISTANCE ACTIVITIES (T&TA) FOR BOTH SERVICE PROVIDER AND MINNESOTA WAP STAFF ARE INSTRUMENTAL IN THE PROVISION OF WEATHERIZATION SERVICES TO INCOME-ELIGIBLE HOUSEHOLDS IN MINNESOTA. MINNESOTA OFFERS COMPREHENSIVE TRAINING THROUGH IREC ACCREDITED PROVIDERS AND RESPONSIVE TRAINING THROUGH A COMBINATION OF QUALIFIED STATE STAFF, INDUSTRY PROFESSIONALS, ONLINE TRAININGS AND CERTIFIED TRAINERS. T&TA ACTIVITIES INCREASE THE EFFICIENCY, QUALITY, AND EFFECTIVENESS OF THE MINNESOTA WAP. ALL T&TA ACTIVITIES HAVE THE FOLLOWING OBJECTIVES:

- Maximize energy savings.
- Ensure the health and safety of low-income households and weatherization workers.
- Increase the effectiveness of client education.
- Minimize production costs and maximize production efficiencies.
- Improve the quality of weatherization work on dwellings.
- Improve program management and administrative procedures.
- Avoid the potential for waste, fraud, abuse and mismanagement.

MINNESOTA RETAINS 70% OF THE STATE’S TOTAL T&TA ALLOCATION FOR TRAINING, PLANNING, OVERSIGHT, AND MONITORING ACTIVITIES. THE REMAINING 30% OF THE STATE’S T&TA ALLOCATION PASSES TO SERVICE PROVIDERS. THE COMPLETION OF REGULAR JOB TASK ANALYSIS (JTA)-ALIGNED COMPREHENSIVE TRAINING IS REQUIRED FOR STAFF IN ALL HOME ENERGY PROFESSIONAL (HEP) JOB CLASSIFICATIONS. MINNESOTA VERIFIES THROUGH THE SERVICE PROVIDER’S LOCAL PLAN AND TRAINING ACTIVITIES REPORT THAT SUFFICIENT TRAINING IS PROVIDED TO APPROPRIATE STAFF. WHILE SERVICE PROVIDERS ARE NOT REQUIRED TO ATTEND ALL T&TA ACTIVITIES, THEY ARE RESPONSIBLE FOR UNDERSTANDING AND IMPLEMENTING ANY TECHNICAL AND POLICY CONTENT COVERED IN THOSE T&TA ACTIVITIES.

MINNESOTA WILL OFFER CONTINUING EDUCATION CREDITS THROUGH ITS ONLINE LMS AND WHERE POSSIBLE AT STATE TRAININGS. MINNESOTA WILL ALSO MAKE SERVICE PROVIDERS AWARE OF ADDITIONAL RESOURCES FOR CONTINUING EDUCATION.

T&TA FUNDS MAY BE USED TO PAY FOR WAGES OF SERVICE PROVIDER WEATHERIZATION WORKERS DURING TRAINING EVENTS.

SERVICE PROVIDER T&TA FUNDS MAY ALSO BE USED PROVIDE TRAINING TO CONTRACTORS THAT SUPPORTS THE FOUR HOME ENERGY PROFESSIONAL OCCUPATIONS (RETROFIT INSTALLER TECHNICIAN, CREW LEADER, ENERGY AUDITOR, QUALITY CONTROL INSPECTOR), INCLUDING PROVIDING A REASONABLE STIPEND TO CONTRACTORS WHO ATTEND WAP TRAINING AT THE REQUEST OF THE SERVICE PROVIDER. ALL SUCH CONTRACTORS MUST SIGN A CONTRACTOR TRAINING AND RETENTION AGREEMENT IN ACCORDANCE WITH DOE GUIDELINES AND OUTLINED IN MINNESOTA POLICY.

T&TA FUNDS MAY BE USED TO PAY FOR OR REIMBURSE TRAINING FEES AND ASSOCIATED TRAINING COSTS, TRAVEL EXPENSES, CERTIFICATION EXAM FEES, AND STIPENDS. TRAVEL REIMBURSEMENTS MUST BE BASED ON ACTUAL COSTS, THE MINNESOTA MANAGEMENT AND BUDGET “COMMISSIONER’S PLAN,” OR A SERVICE PROVIDERS INTERNAL REIMBURSEMENT POLICY. WHILE MINNESOTA DOES NOT PUT A LIMIT ON EXAM RETAKES COMMERCE STAFF ARE INFORMED OF ALL EXAM RETAKES PROVIDED THROUGH FOND DU LAC TRIBAL AND COMMUNITY COLLEGE. MINNESOTA IS NOT AWARE OF A CONTRACT STAFF THAT HAS RETAKEN AND EXAM MORE THAN ONCE. IT IS VERY RARE THAT AN EXAM IS RETAKEN MORE THAN ONCE AND IN THESE LIMITED CASES FDLTCC HAS WORKED WITH THE SUB-GRANTEE, THEIR EMPLOYEE ON A CASE-BY-CASE BASIS TO ENSURE THAT THE EMPLOYEE IS PREPARED BEFORE ADDITIONAL RETAKES.

T&TA FUNDS MAY ALSO BE USED FOR SERVICE PROVIDER ADMINISTRATIVE STAFF TO ATTEND WEATHERIZATION-RELATED TRAINING.
MINNESOTA UTILIZES LOCAL HOME PERFORMANCE INDUSTRY EXPERTS AS MEMBERS OF OUR POLICY ADVISORY COUNCIL AND AS TRAINERS AT OUR ANNUAL WAP TRAINING CONFERENCE.

A QUARTERLY UPDATED TRAINING ACTIVITIES REPORT IS SUBMITTED BY EACH SERVICE PROVIDER TO MINNESOTA AND INCLUDES A LIST OF TRAININGS TAKEN BY EACH EMPLOYEE.

ON A BROADER LEVEL, T&TA NEEDS, INCLUDING CLIENT EDUCATION, ARE ASSESSED IN A NUMBER OF WAYS:

- MINNESOTA STAFF MEMBERS COMPILE AND COMPARE INDIVIDUAL SERVICE PROVIDER MONITORING RESULTS TO DETERMINE MULTIAGENCY NEEDS AND TRENDS.
- SERVICE PROVIDER SURVEYS ARE USED TO ELICIT INPUT FOR GENERAL POLICY/PROCEDURAL ISSUES AND T&TA NEEDS.
- THE MINNESOTA WEATHERIZATION ADVISORY GROUP (MWAG) PROVIDES AN EXCELLENT SOURCE OF INPUT AND FEEDBACK REGARDING T&TA. MWAG MEMBERSHIP IS COMPRISED OF REPRESENTATIVES OF SERVICE PROVIDERS.
- THE POLICY ADVISORY COUNCIL (PAC) IS USED TO GARNER INPUT FROM A BROADER SPECTRUM OF WAP AFFECTED CONSTITUENTS WITHIN THE STATE.
- COOPERATION WITH OTHER ENERGY PROGRAM UNITS WITHIN THE DEPARTMENT OF MINNESOTA PROVIDES SHARING OF INFORMATION ABOUT ENERGY CONSERVATION ISSUES, SOME OF WHICH MAY BE ADDRESSED BY T&TA ACTIVITIES.

EVALUATION FORMS ARE DISTRIBUTED AS A PART OF GROUP T&TA EVENTS. THE COMPLETED EVALUATIONS PROVIDE INFORMATION ABOUT THE EFFECTIVENESS OF THE WORKSHOP, CLASS OR OTHER GROUP ACTIVITY. EVALUATIONS MAY ALSO PROMPT MINNESOTA TO CONSIDER ADDITIONAL TRAINING. THE RESULTS OF THESE EVALUATIONS BECOME PART OF FUTURE T&TA NEEDS ASSESSMENTS.

STATE FIELD AND FISCAL MONITORING VISITS ARE ALSO USED TO EVALUATE T&TA TRAINING EFFECTIVENESS AND TO DETERMINE SPECIFIC TRAINING THAT MAY BE NECESSARY.
## 2.0 — OVERALL T&TA PLAN

Your overall T&TA plan must incorporate suggestions and feedback the following elements.

**Feedback from internal and external reviews, examples include:**

- Feedback from Department of Energy (DOE) Project Officer (PO) monitoring visits
- Internal state audits
- Grantee monitoring of the subgrantees
- Office of Inspector General (OIG) reports
- American Customer Satisfaction Index feedback, and
- Other. Examples include:
  - Training Feedback
  - Training Retention Activities

- Feedback from Department of Energy (DOE) Project Officer (PO) monitoring visits: in PY21 Minnesota delivered an audit process review training that covered the practical application of accurate energy modelling and accurate costs. Utilizing BIL funding, Minnesota plans to reinforce these topics through policy, guidance, and through the PY22 policy update. T&ta provided through BIL funding will continue to emphasize the importance of accurate energy modelling and costs. Specifically, the Training Pathway track specifically for auditors will have these tenets as a key learning objective. The Weatherization Coordinator Track and Administrative Track will also contain this learning objective.

- Grantee monitoring of the subgrantees: Minnesota plans to provide additional remote individualized responsive training based on training needs identified by monitors and subgrantees through Bill T&TA funds. Electronic training and technical assistance reporting will streamline training reporting and training. Training Pathways will be designed to address the most common issues before they becoming monitoring issues.

- American Customer Satisfaction Index (ACSI) feedback: in response to the ACSI Minnesota will continue to provide online training opportunities and provide responsive training in the “Weekly Email” and “Question of the Week.”

- Minnesota assessed service provider training needs through a series of stakeholder engagement activities, including a survey, in-person meeting, and virtual presentations, during its BIL planning process resulting in an increase to BPI certification training and other training initiatives outlined in this plan as well as the development of the Training Pathways.

### Existing or Planned Accredited Training Center Partnership or Working Relationship.

Minnesota partners with a number of weatherization training centers through direct contracts and indirectly through an state interagency agreement with Fond du Lac Tribal and Community College (FDLTCC). Through FDLTCC, Minnesota has also partnered with Slipstream (WI) and CHP (VA) to provide comprehensive training. Additionally, Minnesota partners with Saturn Resource Management, Energysmart Academy, Minnesota’s Clean Energy Resource Teams, NYSWDA, Affordable Energy Solutions and the Association of Energy Affordability.

### Preparations for future/upcoming program requirements, examples include:

- Updated Standard Work Specifications (SWS)
- Migration to online Weatherization Assistant
- Inclusion of specific language from Weatherization Program Notices (WPN)
MINNESOTA HAS WORKED WITH ENERGYSMART ACADEMY TO CREATE A CUSTOMISED DECK OF CARDS FIELD GUIDE (WHICH IS BASED ON AND REFERENCES THE UPDATED SWS) AND WAS APPROVED BY DOE. ADDITIONALLY, MINNESOTA PURCHASED SATURN’S SWS ALIGNED FIELD GUIDE AS A CONTINUED REFERENCE MATERIAL FOR TECHNICAL AND FIELD STAFF. MINNESOTA IS WORKING TO DEVELOP NEW PROGRAM MANAGEMENT SOFTWARE.

WHAT PROTOCOLS ARE IN PLACE WHICH ENSURE UNTRAINED STAFF ARE NOT LEFT WITHOUT SUPERVISIONS DURING FIELD OPERATIONS?

MINNESOTA DOES NOT REQUIRE SPECIFIC CERTIFICATION OF SERVICE PROVIDER STAFF PRIOR TO HIRE. RATHER, IT IS THE RESPONSIBILITY OF THE SERVICE PROVIDER TO ENSURE THE QUALIFICATIONS OF ITS HRES. AUDITORS MUST SUCCESSFULLY COMPLETE THE BUILDING ANALYST (BA) FROM (BPI) WITHIN THE FIRST YEAR OF WORK. EQUIVALENT CERTIFICATION MAY BE USED WITH APPROVAL FROM MINNESOTA. THE WORK OF NEW ENERGY AUDITORS MUST BE CLOSELY SUPERVISED DURING THE COURSE OF THEIR TRAINING AND PRIOR TO MEETING CERTIFICATION REQUIREMENTS TO ENSURE COMPLIANCE TO PROGRAM GUIDELINES. IN PY21 MINNESOTA BEGAN PROVIDING INDIVIDUALIZED REMOTE TRAINING OPPORTUNITIES FOR ALL NEW AND EXISTING SERVICE PROVIDER TECHNICAL STAFF. ALL INSPECTORS MUST BE QCI CERTIFIED PRIOR TO COMPLETING INSPECTIONS FOR WORK PAID FOR WITH DOE FUNDS. MINNESOTA PLANS TO UTILIZE BIL FUNDS TO EMBED MORE CLEARLY DEFINED ONBOARDING AND TRAINING PATHWAYS FOR ENERGY AUDITORS, INSPECTORS AND INSTALLERS AMONG OTHER POSITIONS.

PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.

MINNESOTA CURRENTLY PARTNERS WITH FOND DU LAC TRIBAL AND COMMUNITY COLLEGE INCLUDING USE OF A TEST HOUSE ON THEIR CAMPUS APPROVED BY BPI FOR HEP FIELD EXAMS. MINNESOTA HOPES TO PROVIDE MORE GEOGRAPHICALLY DIVERSE CERTIFICATION TRAINING AND WILL EXPLORE OPTIONS FOR ADDITIONAL TRAINING FACILITIES IN OTHER AREAS OF THE STATE AND IN PARTICULAR A MORE CENTRALLY LOCATED FACILITY WITH A TEST HOUSE.

HOW DOES ANALYSIS CONDUCTED, AS DETAILED IN SECTION V.6 OF THE ANNUAL APPLICATION, INFLUENCE THE DEVELOPMENT OF T&TA ACTIVITIES AND PRIORITIES?

INDIVIDUAL SERVICE PROVIDER T&TA NEEDS ARE ASSESSED IN FOUR WAYS:

- Monitoring activities (dwelling inspections, fiscal/administrative, desk monitoring, DOE inspections, and all other types) are used to identify specific areas where improvement is needed. In addition, informal conversations with Service Provider personnel, not connected to monitoring, are used as a means of identifying specific T&TA needs at the Service Provider level.
- Service Providers assess their own T&TA needs and objectives via the submission of a Local Plan as a part of their Annual Budget.
- Monthly desk monitoring reports direct responsive training to Service Providers to improve effectiveness and drive continuous improvement.
- Each Service Provider’s work plan and budget are reviewed as part of the contract submission process and are evaluated during monitoring activities.

MINNESOTA USES THE ABOVE ANALYSIS TO INFORM ITS COMPREHENSIVE AND RESPONSIVE TRAINING OFFERINGS. ADDITIONALLY, MONITORS GIVE TRAINING ASSIGNMENTS AND RECOMMENDATIONS TO SERVICE PROVIDERS BASED ON THE RESULTS OF MONITORING VISITS. IN THIS WAY MINNESOTA USES ITS PROGRAM ANALYSIS AND MONITORING EFFORTS TO INFORM ITS TRAINING EFFORTS.
3.0 – WORKFORCE CREDENTIALS

DESCRIBE THE FOLLOWING ASPECTS OF YOUR T&TA PLAN RELATED TO WORKFORCE CREDENTIALS.

**FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**
- ENVIRONMENTAL PROTECTION AGENCY LEAD RENOVATION, REPAIR, AND PAINTING PROGRAM
- HOME ENERGY PROFESSIONALS QUALITY CONTROL INSPECTOR CERTIFICATION
- THE HOME ENERGY PROFESSIONAL QUALITY CONTROL INSPECTOR CERTIFICATION IS REQUIRED FOR ALL STAFF INSPECTING WORK PAID FOR WITH DOE FUNDS EXCEPT IN CASES WHERE SUB-GRAnteES HAVE BEEN APPROVED TO HAVE AN INDIVIDUAL STAFF MEMBER PARTICIPATE IN A QCI MENTORSHIP PROGRAM PER WPN 22-4.
- ALL CREW BASED AGENCIES AND BUILDING SHELL CONTRACTORS ARE REQUIRED TO BE AN EPA RRP CERTIFIED FIRM.
- ALL AGENCIES AND CONTRACTORS MUST HAVE AN EPA CERTIFIED RRP RENOVATOR ON SITE AT PROJECTS NEEDING LEAD-SAFE WORK PRACTICES, AS DICTATED BY EPA REQUIREMENTS.
- ALL AGENCY CREWS AND BUILDING SHELL CONTRACTOR JOB-SITE EMPLOYEES WORKING IN WAP HOUSEHOLDS MUST BE TRAINED TO INSTALL MEASURES IN A LEAD-SAFE MANNER IN ACCORDANCE WITH THE SWS AND EPA PROTOCOLS, AND CERTIFIED BY THE EPA AS RRP LEAD RENOVATOR.

**GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**
- BUILDING PERFORMANCE INSTITUTE BUILDING ANALYST
- GRANTEE-DEVELOPED CERTIFICATIONS

MINNESOTA DOES NOT CURRENTLY REQUIRE ANY GRANTEE-DEVELOPED CERTIFICATIONS. EQUIVALENT CERTIFICATIONS TO THE BPI BUILDING ANALYST CERTIFICATION (SUCH AS HERS RATER) ARE RECOGNIZED BY MINNESOTA ON A CASE-BY-CASE BASIS. THE TYPICAL FIRST STEP FOR ENERGY AUDITORS AND QUALITY CONTROL INSPECTORS IS TO GAIN THE BPI BUILDING ANALYST CERTIFICATION, QUALIFYING THEM TO PERFORM ENERGY AUDITS, FOLLOWED BY HEP ENERGY AUDITOR TRAINING AND CERTIFICATION AFTER PREREQUISITES ARE GAINED. MINNESOTA TYPICALLY OFFERS HEP QCI MICRO-CERTIFICATION TRAINING AND EXAMS TWO TO THREE MONTHS AFTER OFFERING THE HEP ENERGY AUDITOR CERTIFICATION AND EXAMS THUS ALLOWING QUALIFIED STAFF TO GAIN BOTH HEP CERTIFICATIONS AS QUICKLY AS POSSIBLE AFTER MEETING PREREQUISITES.

UTILIZING BIL GRANT FUNDING, MINNESOTA PLANS TO DEVELOP TRAINING PATHWAYS FOR WEATHERIZATION TECHNICAL STAFF, ADMINISTRATIVE STAFF, BUILDING SHELL CREWS AND CONTRACTORS, HVAC CONTRACTORS, ELECTRICAL CONTRACTORS, AND ASBESTOS REMEDIATION CONTRACTORS AND EMBED THESE TRAINING PATHWAYS IN OUR LEARNING MANAGEMENT SYSTEM. ADDITIONALLY MINNESOTA PLANS TO EXPAND ITS LEARNING MANAGEMENT SYSTEM TO BETTER TRACK SERVICE PROVIDER TRAINING NEEDS AND PROVIDE MORE TIMELY AND RESPONSIVE TRAINING.

**SUBGRANTEE/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**
- CONTRACTOR LICENSING

ALL CONTRACTORS AND THEIR SUBCONTRACTORS AND CREWS MUST BE LICENSED AND BONDED AS REQUIRED BY PERTINENT LAWS, ORDINANCES, REGULATIONS, OR CODES.

**INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**
- EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION
- VENDOR CERTIFICATION (E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)

MINNESOTA DOES NOT REQUIRE INDUSTRY REQUIRED CREDENTIALS BEYOND THE BUILDING PERFORMANCE INDUSTRY CREDENTIALS MENTIONED ELSEWHERE IN THIS PLAN.

**PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS**
**How Credentials are Tracked**

Minnesota keeps record of the certifications and dates for all agency staff. Minnesota uses this information to schedule and coordinate re-certification training and exam offerings.

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### 4.0 – Training

Grantees have two options to describe their training.

- **A)** *Use the embedded spreadsheet* to identify and describe the training schedule for Grantee and Subgrantee staff. Include technical and non-technical training.

- **B)** *Or use the fields below to identify and describe the training schedule for Grantee and Subgrantee staff. Include technical and non-technical training.*

Grantee’s are to include the following in their descriptions regardless of what option is being used to describe their training plan:

- Specify whether attendance is mandatory, and the ramifications for non-compliance.
- Specify if the T&TA plan spans multiple Program Years (PY), indicate which trainings are intended in the current PY and which are planned for future PYs.

* The embedded spreadsheet, if completed at the end of the year to record delivered training, can be used as documentation for the required annual T&TA report. Double click to open spreadsheet. Enter information and close. It will automatically save your information.

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**Programmatic/Administration Training**

- Financial (i.e. 2 CFR 200)
- Management (i.e. 10 CFR 440)
SERVICE PROVIDER BIL FUNDING PLANNING WORKSHOPS: In PY22, Minnesota will provide up to six two-day BIL funding local plan workshops to assist service providers developing local plans. Topics covered will include core budget/production, leveraging plans, training plans, equity/justice 40, and service to renters and multifamily residents. In years two through five of the BIL Grant period Minnesota will provide up to two two-day workshops to assist service providers in effectively meeting their BIL local plan requirements.

Throughout the BIL Grant Minnesota will continue to meet regularly with the Weatherization Advisory Group (MWAG); the MN Community Action Partnership (MinnCAP) directors meeting; and the Fiscal Directors in order to keep the weatherization network up to date with program developments and reinforce Minnesota policy.

Throughout the BIL Grant Minnesota will continue to encourage program coordinators and administrative staff to utilize NREL’s WAP Administrative Training.

Throughout the BIL Grant Minnesota will continue to provide annual and mid-year policy updates to service providers and annual OMB training for fiscal staff.

There will also be training pathway tracks for fiscal and admin staff.

Unless otherwise noted, service providers are not required to attend all T&TA activities although they are responsible for understanding and implementing any technical and policy content covered in those T&TA activities.

The requested full list of trainings is incorporated into the WAP BIL Workbook included with the attachments to this application.

<table>
<thead>
<tr>
<th>Comprehensive Technical Training Aligned to the Job Task Analysis (Identify at what intervals workers will receive regular, comprehensive training as required by Weatherization Program Notice (WPN) 15-4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Quality Control Inspector</td>
</tr>
<tr>
<td>- Energy Auditor</td>
</tr>
<tr>
<td>- Crew Lead</td>
</tr>
<tr>
<td>- Retrofit Installer/Technician</td>
</tr>
</tbody>
</table>

WAP BIL Comprehensive trainings include JTA-aligned Crew Leader, Retrofit Installer, Energy Auditor and Quality Control Inspector trainings to reflect industry-wide initiatives and broaden the skills necessary to successfully maintain quality work in the WAP. Minnesota will continue to address recent changes to the HEP Energy Auditor and QCI certification scheme.

In response to anticipated staffing increases Minnesota plans to provide additional comprehensive training.

Additional Multifamily QCI training: Minnesota will utilize BIL funding to provide additional multifamily QCI training to account for increased staffing and multifamily project initiatives.

Additional BPI BA, HEP EA and QCI Certification Training: Minnesota will utilize BIL funding to provide additional BPI Building Analyst, HEP Energy Auditor, and QCI Certification Training.

Unless otherwise noted, Service Providers are not required to attend all T&TA activities although they are responsible for understanding and implementing any technical and policy content covered in those T&TA.
ACTIVITIES. WHILE ATTENDANCE AT BPI BA AND BPI HEP TRAININGS IS NOT REQUIRED, THESE CERTIFICATIONS ARE REQUIRED AND
SERVICE PROVIDER STAFF MOST OFTEN TAKE ADVANTAGE OF THE OPPORTUNITIES PROVIDED BY MINNESOTA TO ACHIEVE THESE
CERTIFICATIONS. SERVICE PROVIDERS HAVE OCCASIONALLY PROVIDED CERTIFICATION TRAINING AND TESTING INDEPENDENTLY DUE
TO SCHEDULING CONFLICTS, BUT THIS IS UNCOMMON.

ANALYSIS OF TRAINING NEEDS FOR WEATHERIZATION WORKERS

IN ADDITION TO WEATHERIZATION WORKER TRAINING NEEDS COVERED BY ANNUAL FORMULA GRANT FUNDING, MINNESOTA
ANTICIPATES THE NEED TO OFFER ADDITIONAL CERTIFICATION TRAINING IN RESPONSE TO INCREASED HIRING BY OUR SERVICE PROVIDER
NETWORK.

QUALITY CONTROL INSPECTOR (QCI)

AS OF THE END OF THE THIRD QUARTER OF PY21, MINNESOTA WAP HAS 53 QCI CERTIFIED INDIVIDUALS IN ITS
STATEWIDE NETWORK AS WELL AS FIVE QCI CERTIFIED INDIVIDUALS IN ITS STATE STAFF. ALL SERVICE PROVIDERS
CURRENTLY HAVE ACCESS TO A QCI THROUGH DIRECT EMPLOYMENT OR A CONTRACTUAL AGREEMENT. MINNESOTA WILL
OFFER QCI TRAINING AND WRITTEN EXAMS SOON AFTER THE HEP ENERGY AUDITOR TRAINING AND EXAMS ARE OFFERED.
DEPENDING ON HIRING THIS IS ESTIMATED TO BE TWO TO FOUR ADDITIONAL TRAININGS IN PY22 AND PY23. THE NEED FOR QCI
TRAINING IS MODERATE.

ENERGY AUDITOR (EA)

IN PY22 AND PY23 MINNESOTA ANTICIPATES THAT SERVICE PROVIDERS WILL HIRE UP TO AN ADDITIONAL 20-30 NEW ENERGY
AUDITORS AND PLANS TO PROVIDE UP TO FOUR ADDITIONAL BPI BUILDING ANALYST COURSES AND EXAMS FOR THESE NEWLY
HIRED STAFF AND UP TO FOUR ADDITIONAL HEP ENERGY AUDITOR COURSES AND EXAMS FOR CURRENT ENERGY AUDITORS.

CREW LEADER (CL) AND RETROFIT INSTALLER (RI)

FOR BUILDING SHELL WORK, MINNESOTA HAS SIX CREW BASED SERVICE PROVIDERS AND THE REMAINING 17 ARE CONTRACTOR
BASED. WHILE CREW BASED AGENCIES CONSISTENTLY SEND THEIR STAFF TO OFFERED TRAININGS, AGENCIES THAT UTILIZE
CONTRACTORS HAVE HISTORICALLY HAD DIFFICULTY CONVINCING BUILDING SHELL CONTRACTORS TO ATTEND JTA-ALIGNED
TRAININGS IN SPITE OF OFFERING STIPENDS. IN PY22, MINNESOTA WILL ADDRESS THE WPN 22-4 SECTION 4 REQUIREMENT THAT
BUILDING SHELL CREWS AND CONTRACTORS RECEIVE JTA-ALIGNED TRAINING BY REQUIRING PARTICIPATION IN TWO JTA-ALIGNED
TRAINING ANNUALLY. IN PY22, CONTRACTOR TRAINING WILL ALSO INCLUDE REVIEW OF THE DOE STANDARD WORK SPECIFICATIONS
(SWS) AND MINNESOTA’S SWS DECK OF CARDS FIELD GUIDE. IN PY22 MINNESOTA WILL RELEASE A BADGES TRAINING PROGRAM
to the network and begin requiring crew and contractor staff to gradually gain their badges.

MULTIFAMILY: ALL FOUR JOB TITLES

MINNESOTA WILL UTILIZE BIL FUNDING TO OFFER ADDITIONAL MULTIFAMILY QCI GAP TRAINING AS NEEDED FOR SUB GRANTEE STAFF
BETWEEN PY22 AND PY25. MINNESOTA ANTICIPATES UP TO FIVE ADDITIONAL TRAINING OFFERINGS WILL BE PROVIDED.
**SPECIFIC TECHNICAL TRAINING**

- **TOPICS IDENTIFIED DURING MONITORING VISIT(S)**
- **ENERGY MODELING**
- **HEALTH & SAFETY.** All H&S topics in WPN 22-7 require some level of training for all affected workers, the frequency of this training is a grantee decision. Examples include:
  - Air Conditioning and Heating Systems
  - Asbestos
  - Biologicals and Unsanitary Conditions
  - Building Structure and Roofing
  - Code Compliance

  - Combustion Gases
  - Electrical
  - Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants
  - Fuel Leaks
  - Gas Range/Ovens
  - Hazardous Materials Disposal
  - Injury Prevention of Occupants and Weatherization Workers
  - Lead Based Paint
  - EPA’s Lead Renovation, Repair & Painting Program (RRP) Mold/Moisture
  - Pests
  - Radon
  - Safety Devices
  - Ventilation and Indoor Air Quality
    - American Society of Heating Refrigeration and Air-Conditioning Engineers (ASHRAE)
  - Window Repair, Door Repair
  - Worker Safety
    - OSHA
  - Additional topics as described in Health & Safety Plan

- **CLIENT EDUCATION** (training workers to conduct client education). Examples include:
  - Energy Savings Strategies
  - Program-specific information. Examples include:
    - What to Expect
    - Additional Resources
  - Health & Safety Issues

Health and Safety Training: Minnesota has developed a health and safety curriculum covering topics outlined in WPN 22-7 and Minnesota WAP policy. This training is available for Minnesota staff free of charge on our Learning Management System.

Additional Mechanical Systems/CAZ Training: A three-day course covering topics such as Refrigeration, Combustion, and CAZ Depressurization Testing, Ventilation, and Multifamily HVAC will be offered to service providers utilizing Minnesota specific training materials. This training will be offered up to two additional times during PY22 and PY23.
ADDITIONAL REMOTE INDIVIDUALIZED RESPONSIVE TRAINING AND TECHNICAL ASSISTANCE: MINNESOTA HAS PROCURED THE SERVICES OF TWO TRAINERS AND ONE TRAINING ORGANIZATION TO PROVIDE INDIVIDUALIZED RESPONSIVE TRAINING AND TECHNICAL ASSISTANCE TO NEW AND EXPERIENCED SERVICE PROVIDER STAFF STATEWIDE THROUGH ITS CONTRACT WITH CLEAN ENERGY RESOURCE TEAMS WHO MAY PROCURE MORE TRAINERS TO MEET THE DEMAND OF INCREASED STAFFING. BIL FUNDS WILL BE USED TO ADD INCREASE THE BUDGET AVAILABLE FOR RESPONSIVE TRAINING.

MULTIFAMILY WEATHERIZATION TRAINING AND TECHNICAL ASSISTANCE: MINNESOTA WILL PROCURE THE SERVICES OF A TRAINER OR TRAINING ORGANIZATION TO PROVIDE INDIVIDUALIZED RESPONSIVE TRAINING AND TECHNICAL ASSISTANCE TO SERVICE PROVIDERS WEATHERIZING 5+ UNIT MULTIFAMILY BUILDINGS.

SERVICE PROVIDERS WILL BE RESPONSIBLE FOR COSTS RELATED TO:
- TRAVEL AND LABOR RELATED TO STATE SPONSORED COMPREHENSIVE AND SPECIFIC TRAINING
- LSW AND LEAD RENOVATOR TRAINING AND CERTIFICATION
- CONTINUING EDUCATION CREDITS FOR ANY RELEVANT CERTIFICATIONS (E.G. QCI OR BUILDING ANALYST)
- ADDITIONAL COMPREHENSIVE AND SPECIFIC TRAINING NOT AVAILABLE THROUGH COMMERCE
- CONTRACTOR STIPENDS, IF ANY

SERVICE PROVIDERS WILL PROVIDE A T&TA BUDGET AS PART OF THE CONTRACTING PROCESS THAT COMMUNICATES A THOROUGH PLAN TO EXPEND ALL T&TA FUNDS IN AN EFFECTIVE MANNER.

CONFERENCES. EXAMPLES INCLUDE:
- ENERGY OutWEST
- BUILDING PERFORMANCE ASSOCIATION
- NATIONAL ASSOCIATION FOR STATE AND COMMUNITY SERVICE PROVIDERS
- COMMUNITY ACTION PARTNERSHIP

THE ANNUAL STATE ENERGY CONFERENCE, WHICH IS ORGANIZED BY A SERVICE PROVIDER WORKING GROUP, WILL BE HELD IN MAY OF 2023. AS IT REGULARLY HAS, MINNESOTA PLANS TO SPONSOR THIS CONFERENCE AND HELP DEVELOP THE CONFERENCE CONTENT SO IT ALIGNS WITH MINNESOTA’S TRAINING OBJECTIVES.

NATIONAL WEATHERIZATION CONFERENCES: MINNESOTA APPROVES OUT OF STATE TRAVEL REQUESTS FROM SERVICE PROVIDERS FOR NATIONAL CONFERENCE ATTENDANCE BASED ON AVAILABILITY OF FUNDS AND THE RELEVANCE OF CONFERENCE CONTENT FOR WEATHERIZATION STAFF INCLUDING THE NATIONAL HOME PERFORMANCE CONFERENCE AND ENERGY OutWEST.

MINNESOTA REGULARLY SENDS STATE STAFF TO THE FALL AND WINTER CONFERENCES SPONSORED BY THE NATIONAL ASSOCIATION OF STATE AND COMMUNITY SERVICE PROVIDERS.

OTHER, PLEASE SPECIFY:

DESCRIBE OTHER TRAINING ACTIVITIES HERE

5.0 — TECHNICAL ASSISTANCE

DESCRIBE THE TECHNICAL ASSISTANCE ACTIVITIES INCLUDED IN THE T&TA BUDGET CATEGORY.

PROGRAMMATIC/ADMINISTRATION SUPPORT

MINNESOTA PROVIDES REGULAR RESPONSIVE TRAINING AND TECHNICAL ASSISTANCE THROUGH THE WEATHERIZATION EMAIL INBOX, INCLUDING OVER 500 INDIVIDUAL REQUESTS EACH PROGRAM YEAR. ADDITIONALLY, MINNESOTA PROVIDES TECHNICAL ASSISTANCE THROUGH PHONE CALLS, MONITORING EVENTS, AND MID-YEAR CALLS.
**TECHNICAL SUPPORT**

Minnesota provides program management software support through a separate email address administrated by the software provider that is forwarded to the weatherization email inbox so that Minnesota staff are aware of all technical assistance requests. Additional technical support is provided through phone calls and monitoring events as well as scheduled one-on-one tutorials.

**HEALTH & SAFETY SUPPORT ACTIVITIES**

Minnesota has developed a health and safety curriculum based on WPN 22-7 and Minnesota WAP policy and during PY20 an online training was developed using this curriculum. This training is now available on the Minnesota Weatherization LMS. Additional health and safety support is provided though phone calls, monitoring events and the weatherization email inbox.

**MONITORING**

What percentage of T&TA funding is allocated to monitoring? (If defined in section B of the budget details within the annual application, include that within your description below.)

Six percent of WAP BIL T&TA funding is allocated to Monitoring.

Other, please specify

Minnesota has developed numerous technical guidance documents found in the appendices of its policy manual. These contain technical guidance for specific programmatic and technical areas.

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### 6.0 CLIENT EDUCATION

Describe what current and planned client education materials and/or activities are included in the T&TA budget category. Only those paid for with T&TA funds need to be mentioned.

Note: This does not include training workers to deliver client education. This should be described in the training section, above.

**Client Education Activities prior to, during and after weatherization which address the weatherization process and energy savings details**

Minnesota Weatherization staff provide client education through required client forms. In addition, the following written resources are available as applicable.

- [Home Energy Guide](#). (pdf)
- [Be Energy Smart and Do Your Part](#). (pdf)
- [Renovate Right Brochure Guide](#)
- [Your Weatherization Project](#). (pdf)
- [Clean Fans Work Better](#). (pdf)
- [Some Basic Energy-Saving Tips for the Heating and Cooling Seasons](#). (pdf)

Additionally, during PY21, Minnesota released a series of animated client education videos that provide information about weatherization services, the process of having one’s home weatherized, and building science and health and safety related information.

Minnesota plans to utilize BIL funding to create outreach resources and social media tool kits to equip service providers in their efforts to inform their communities and potential contractors about WAP resources. These kits will include strategies for outreach, multimedia tools, visual aids, and talking points including translation when appropriate.
## Client Education Activities Regarding H&S Issues as Indicated in WPN 22-7

- Air Conditioning and Heating Systems
- Asbestos
- Biologicals and Unsanitary Conditions
- Building Structure and Roofing
- Code Compliance
- Combustion Gases
- Electrical
- Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and Other Air Pollutants
- Fuel Leaks
- Gas Range/Ovens
- Hazardous Materials Disposal
- Injury Prevention of Occupants and Weatherization Workers
- Lead Based Paint
- EPA’s Lead Renovation, Repair & Painting Program (RRP) Mold/Moisture
- Pests
- Radon
- Safety Devices
- Ventilation and Indoor Air Quality
  - American Society of Heating Refrigeration and Air-Conditioning Engineers (ASHRAE)
- Window Repair, Door Repair
- Worker Safety
  - OSHA
- Additional Topics as Described in Health & Safety Plan
**CLIENT EDUCATION ACTIVITIES REGARDING H&S ISSUES AS INDICATED IN WPN 22-7**

- **Air Conditioning and Heating Systems:** Verbal or written material covering operation, maintenance, and how to identify health and safety concerns. In cases of installations, all manuals are provided to the homeowner. In cases where bulk fuel tanks are not removed as part of weatherization, written or verbal instruction of proper disposal is provided.
- **Asbestos (All):** Clients are informed in writing of any suspected ACMs that will be disturbed during the weatherization process and the precautions that will be taken to ensure the occupants and workers safety through the weatherization process. If testing of a suspected ACM is conducted, the owner will be informed in writing of the results; (vermiculite); and (on pipes, furnaces, and other small covered surfaces): If testing of a suspected ACM is conducted, the owner will be informed in writing of the results.
- **Biologicals and Unsanitary Conditions:** The energy auditor will review any findings from the audit.
- **Building Structure and Roofing:** Any situations discovered during the energy audit that would require deferral or correction are reviewed with the client and documented on the appropriate form or scope of work.
- **Code Compliance:** Any situations discovered during the energy audit that would require deferral or correction are reviewed with the client and documented on the appropriate form or scope of work.
- **Combustion Gases:** Combustion safety is a topic that energy auditors discuss with clients after the energy audit.
- **Electrical:** When this hazard is identified, it is reviewed with the client and noted on the Safety Assessment form.
- **Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and Other Air Pollutants:** When this hazard is identified, it is reviewed with the client and noted on the Safety
**ASSESSMENT FORM.**

- **FUEL LEAKS:** When this hazard is identified, it is reviewed with the client and noted on the Safety Assessment Form.

- **GAS RANGE/Ovens:** When this hazard is identified, it is reviewed with the client and noted on the Safety Assessment Form.

- **HAZARDOUS MATERIALS DISPOSAL:** When this hazard is identified, it is reviewed with the client and noted on the Safety Assessment Form.

- **INJURY PREVENTION of Occupants and Weatherization Workers:** Energy auditors will work with clients to address client injury prevention related to weatherization work including issues related to deferrals and pre-existing conditions.

- **LEAD BASED Paint:** If lead testing is conducted, the owner will be informed in writing of the results. The Renovate Right Pamphlet is provided to all clients who live in homes built prior to 1978 to ensure they are aware of EPA’s Lead Renovation, Repair & Painting Program (RRP).

- **MOLD/MoISTURE:** Auditors provide one-on-one general education to all clients regarding high indoor moisture levels or actual moisture penetration, including the cause of moisture problems and how to avoid moisture problems. Clients are taught how to maintain acceptable relative humidity levels in the dwelling and how to operate any newly installed bath and/or kitchen fans. Energy auditors educate clients on moisture if they identify practices that might result in high moisture levels in the home. Energy auditors are encouraged to utilize moisture meters to help quantify the moisture content of suspect building components. The following are client practices which may have an effect on the moisture levels:
  - **Cooking and use of Kitchen exhaust fans**
  - **Bathing, showering and use of bathroom exhaust fans**
  - **Proper use and placement of humidifiers and dehumidifiers**
  - **Indoor plants**
  - **Aquariums**
  - **Storage of firewood inside the dwelling or attached garage**
  - **Plastic window covers**
  - **Keeping gutters clean**
  - **Leaky plumbing or fixtures**
  - **Site drainage**
  - **Sump Pumps**

**Correction of moisture and mold-creating conditions are allowed when it is necessary to ensure the long-term stability and durability of the measures in weatherizing the home. Minnesota therefore allows the treatment of moisture sources and drainage issues when such actions are either necessary to effectively perform weatherization work to ensure the work will be lasting and effective OR are necessary, as a result of weatherization work, so as not to create a health or safety problem for the occupant. Activities, as outlined in WPN 22-7 are limited to those that are conducted where efficiency measures are identified for installation. Installation of these items must be pre-approved by Minnesota. If moisture problems in a dwelling are severe and cannot be resolved under existing allowable health and safety measures or repair allowances, Service Provider auditors must explain to clients that weatherization measures could make the situation worse (e.g. attic and wall insulation and high-efficient furnace installation) and may not be completed until moisture problems are remedied by the client or landlord. Weatherization measures that do not disturb mold or exacerbate existing moisture problems may be completed with prior approval from Minnesota in certain circumstances.**

- **PESTS:** Client education videos inform clients that energy auditors will inform them of the presence of the evidence of pests; whether program funds can be utilized to remediate; and if
OTHER COMMUNITY RESOURCES ARE AVAILABLE TO THE CLIENT.

- **Radon:** If radon testing is conducted, the owner will be informed in writing of the results. Energy auditors review the Confirmation of Receipt of A Citizen’s Guide to Radon Pamphlet form with clients at the energy audit.

- **Safety Devices:** Energy auditors are required to educate the client on operating procedures, care and replacement of units.

- **Ventilation and Indoor Air Quality:** Clients are presented with information on combustion safety and hazards, including the importance of using exhaust ventilation when cooking as a part of client education on combustion appliances. Client education is conducted during the QCI and includes information on the location of service switches and cleaning of any ventilation equipment installed to meet the American Society of Heating Refrigeration and Air-Conditioning Engineers (ASHRAE) 62.2 ventilation standard.

- **Window Repair, Door Repair:** Client education videos emphasize that window and door repair are not typical in WAP and almost always limited to windows or doors that are broken or not structurally sound.
### BUDGET AND PRODUCTION PLANNING

<table>
<thead>
<tr>
<th></th>
<th>Total MN Allocation</th>
<th>TOTAL COMM</th>
<th>COMMERCE</th>
<th>CONTRACTORS</th>
<th>SERVICE PROVIDERS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$ 76,218,512</td>
<td>$ 13,323,901</td>
<td>$ 9,326,731</td>
<td>$ 6,522,731</td>
<td>$ 2,894,000</td>
</tr>
<tr>
<td><em>T&amp;A Allocation Formula (17.48%)</em></td>
<td>$ 13,323,901</td>
<td>$ 7,621,851</td>
<td>$ 3,201,472</td>
<td>$ 2,523,655</td>
<td>$ 1,497,481</td>
</tr>
<tr>
<td><em>Leveraging (10%)</em></td>
<td>$ 7,621,851</td>
<td>$ 3,201,472</td>
<td>$ 1,524,370</td>
<td>$ 859,460</td>
<td>$ 4,400,000</td>
</tr>
<tr>
<td><em>Total MN Administration (15% of Program Ops)</em></td>
<td>$ 11,432,777</td>
<td>$ 4,001,742</td>
<td>$ 1,524,370</td>
<td>$ 2,396,655</td>
<td>$ 7,431,305</td>
</tr>
<tr>
<td><em>Total Program Operations (58%)</em></td>
<td>$ 43,839,983</td>
<td>$ 12,011,250</td>
<td>$ 6,522,731</td>
<td>$ 3,997,170</td>
<td>$ 4,393,983</td>
</tr>
</tbody>
</table>

|                          | Service Provider Breakout | $ 43,839,983 | $ 7,557,997 |
| **Health and Safety (15% of total Program Ops)** | | $ 2,658,000 | $ 3,002,812.55 |
| **Total Program Operations (w/o H/S/LI/FA) (43%)** | | $ 36,690,365 | $ 4,964,650.07 |
| **Total Liability Insurance and Financial Audits** | | $ 573,820 | $ 10,400,000 |

| TOTAL SP Allocation Amt | $ 55,268,458 | $ 1,801,687.53 |

#### Average Cost Per Unit / Production / Health & Safety

| Estimated ACPU Total (net to exceed $8,000) | $ 8,000 |
| Total Minimum Number of Units | 453 |
| Total Health & Safety/Unit | $ 1,435 |

*Note DOE Renewable Energy Limit = $3929 (within total ACPU)*

|                          | 1,375 |
| **Total Approved Indirect Rate (10.6%)** | 424,156 |
| * Commerce Admin Indirect | $ 424,156 |
| * Commerce TTA Indirect | $ 988,633 |
| * Commerce Leverage Indirect | $ 161,583 |

### TOTAL MN Allocation

<table>
<thead>
<tr>
<th></th>
<th>Budget and Production Planning</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>TOTAL LIABILITY INSURANCE COSTS</td>
</tr>
<tr>
<td></td>
<td>FINANCIAL AUDITS</td>
</tr>
<tr>
<td></td>
<td><strong>Other Contracts</strong></td>
</tr>
</tbody>
</table>

#### LEVERAGING FUNDS

|                          | Commerce Portion (20%) | $ 1,524,370 |
|                          | Commerce Leverage Subtotal | $ 55,268,458 |

### PRODUCTION

#### ANTICIPATED TOTAL SPEND DOWN

<table>
<thead>
<tr>
<th>Quarterly Performance Period</th>
<th>Number of Planned Units</th>
<th>Planned Program Operations Budget (Units * ACPU - vehicles)</th>
<th>Planned H&amp;S Budget</th>
<th>Program, Admin and Fiscal Visits</th>
<th>Quality Control Inspections</th>
<th>In-Progress Dwellings: TRAINING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year 1 (PY22/PY23) Subtotal</td>
<td>0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
</tr>
<tr>
<td>Q1</td>
<td>0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
</tr>
<tr>
<td>Q2</td>
<td>0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
</tr>
<tr>
<td>Q3 (Jan 1, 2023)</td>
<td>0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
</tr>
<tr>
<td>Q4</td>
<td>0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
</tr>
<tr>
<td>$ 1,000,000</td>
<td></td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
<td>$ 0</td>
</tr>
</tbody>
</table>

| Year 2 (PY23/PY24) Subtotal | $ 320,600,000 | $ 3,803,562.56 |
| Q1                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q2                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q3 (Jan 1, 2024)            | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q4                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| $ 10,000,000                |                          | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |

| Year 3 (PY24/PY25) Subtotal | $ 3,600,000 | $ 2,202,062.53 |
| Q1                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q2                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q3 (Jan 1, 2025)            | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q4                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| $ 19,500,000                |                          | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |

| Year 4 Subtotal | $ 3,000,000 | $ 2,402,250.04 |
| Q1                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q2                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q3 (Jan 1, 2026)            | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q4                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| $ 24,500,000                |                          | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |

| Year 5 Subtotal | $ 10,000,000 | $ 3,002,812.55 |
| Q1                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q2                          | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q3 (Jan 1, 2027)            | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q4 (expires June 30, 2027)  | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| Q5 (expires June 30, 2028)  | 0                       | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |
| $ 20,818,512                |                          | $ 0                                       | $ 0                                      | $ 0                            | $ 0                            | $ 0                            |

### TOTAL

|                          | TOTAL | $ 59,868,458 |
|                          | TOTAL SP Allocation Amt | $ 76,218,512 |

|                          | 1,375 |
| **60% of Total** (Q4, Q5) | 1,375 |
### Workforce Planning

#### Grantee Workforce

<table>
<thead>
<tr>
<th>Role</th>
<th>CURRENT:</th>
<th>PLANNED:</th>
<th>% OTHER</th>
<th>EAPWX</th>
<th>DOEADMIN</th>
<th>DOETTA</th>
<th>DOLEV</th>
<th>BILADMIN</th>
<th>BILTA</th>
<th>BILLEV</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manager (MS)</td>
<td>1</td>
<td>1</td>
<td>80%</td>
<td></td>
<td></td>
<td></td>
<td>5%</td>
<td>15%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supervisor (DR)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management Analyst (NEW)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accounting Officer (DL)</td>
<td></td>
<td></td>
<td></td>
<td>55%</td>
<td></td>
<td></td>
<td>45%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tribal Liaison</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>55%</td>
<td></td>
<td>33%</td>
</tr>
<tr>
<td>Grants Specialist (DAL)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>85%</td>
<td>15%</td>
<td></td>
</tr>
<tr>
<td>Program Coordinator (NEW)</td>
<td>0</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Administrator (SM)</td>
<td>1</td>
<td>1</td>
<td>33%</td>
<td>67%</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Training &amp; Technical Assistance Specialist (Ben)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Technical Field Trainer (NEW)</td>
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<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training Contracts Administrator (NEW)</td>
<td>0</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Admin/Program Monitor (DO)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Admin/Program Monitor (P2)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Technical Proficiency Coordinator (NEW)</td>
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<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>QA Monitor - Technical (MCG)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>QA Monitor - Technical (RH)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>QA Monitor - Technical (PG)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>QA Monitor - Technical (JL)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>QA Monitor - Technical (NEW)</td>
<td>0</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>QA Monitor - Technical (NEW) - 4 years total</td>
<td>0</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equity, Innovation, &amp; Outreach Coordinator (NEW)</td>
<td>0</td>
<td>1</td>
<td>5%</td>
<td>95%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Lead Projects Developer</td>
<td>1</td>
<td>1</td>
<td>30%</td>
<td>70%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Systems Administrator (NEW)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>100%</td>
</tr>
<tr>
<td>Senior Training &amp; Outreach Specialist (EB)</td>
<td>1</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Senior Projects Administrator: Leveraging Resources (AO)</td>
<td>1</td>
<td>1</td>
<td>30%</td>
<td>70%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Senior PM: Utility+ Partnerships (NEW)</td>
<td>0</td>
<td>1</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>12</td>
<td>0</td>
<td>20</td>
<td>0</td>
<td>1.35</td>
<td>4.78</td>
<td>2.32</td>
<td>5.00</td>
<td>1.55</td>
<td>4.05</td>
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</tbody>
</table>

Total Number of Subgrantees: 23 planned

<table>
<thead>
<tr>
<th>Role</th>
<th>CURRENT:</th>
<th>PLANNED:</th>
<th>% OTHER</th>
<th>EAPWX</th>
<th>DOEADMIN</th>
<th>DOETTA</th>
<th>DOLEV</th>
<th>BILADMIN</th>
<th>BILTA</th>
<th>BILLEV</th>
</tr>
</thead>
<tbody>
<tr>
<td>RITs and Crew Leads</td>
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<td>36</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Energy Auditors</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Quality Control Inspectors</td>
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<td>75</td>
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<td></td>
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<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Trade Professionals (HVAC, electric, etc.)</td>
<td>284</td>
<td>457</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Managers/Directors</td>
<td>20</td>
<td>23</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>WAP Support/Admin</td>
<td>33</td>
<td>40</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other -Fiscal</td>
<td>45</td>
<td>50</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>193</td>
<td>284</td>
<td>264</td>
<td>457</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please provide responses to the following:

1) What is your current average timeframe for hiring and onboarding new Grantee staff?

Response: It currently takes a minimum of three months to hire a new staff member.

2) What are your primary challenges in the Grantee hiring and
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>6) Provide any additional comments on your plans for ramping up workforce.</td>
<td>Due to the rapid expansion of the program, a new structure is being implemented with a state supervisor (WAP Director) and three new coordinator roles: a Program Coordinator, Technical Coordinator, and Leveraging &amp; Equity Coordinator to provide staff support and communication. In addition, we plan to add additional technical monitors and training staff to support the increased training and monitoring needs. Finally, the existing leveraging specialist position will be modified to respond to more SP support.</td>
</tr>
<tr>
<td>5) Do you anticipate Subgrantees will shift from crew-based to contractor-based models, or vice-versa? Please explain.</td>
<td>Current indications are that one Service Providers (Subgrantee) is considering a shift and that would be from contractors to crews. This specific Service Provider is located in close proximity to two other states both of which have laws and regulations that draw contractors away from weatherization work. The Service Provider believes that moving to a crew would give the organization more control over timelines and quality. Concerns are, of course, about the ability to find qualified workforce. This Service Provider leads a collaborative including two other Service Providers so the impact would fall to both of those agencies also. Minnesota does not anticipate any other shifts among our Service Providers.</td>
</tr>
<tr>
<td>4) If you plan to add contractors at the Grantee level, what is your goal for executing contract(s)? Please provide dates.</td>
<td>The plan is to hold a series of workshops with the current Service Provider network in order to establish the goals and expectations of funding, including increased service to renters. Current SPs will determine their capacity to meet both the single-family and multi-family staffing/certifications for their area. If they determine that they do not have the capacity to meet all needs, a &quot;partner agency&quot; will first be explored (e.g. a current SP serving a region for multi-family complexes). If that is not an option or if there is competition among the SPs, a full Request for Proposals, in accordance with federal and state procurement requirements will be executed. In addition, if any current Service Providers leave the network, the standard process of establishing a temporary service provider followed by a full Request for Proposals will be implemented.</td>
</tr>
<tr>
<td>3) Do you anticipate receiving support from other program staff at the Grantee level? If yes, what role will shared staff fill?</td>
<td>Shared staff will continue to fill expected roles such as accounting, liaison granting services.</td>
</tr>
<tr>
<td>Challenges vary depending on the position. A new technical position can take a minimum of six months to onboard, depending on current credentials. Other positions vary depending on the requirements of the position. Responses to positions also greatly vary with limited candidate pools of 4-6 to extensive candidate pools of 30+</td>
<td></td>
</tr>
<tr>
<td>2) Do you anticipate receiving support from other program staff at the Grantee level? If yes, what role will shared staff fill?</td>
<td>Challenges vary depending on the position. A new technical position can take a minimum of six months to onboard, depending on current credentials. Other positions vary depending on the requirements of the position. Responses to positions also greatly vary with limited candidate pools of 4-6 to extensive candidate pools of 30+</td>
</tr>
<tr>
<td>1) Do you anticipate receiving support from other program staff at the Grantee level? If yes, what role will shared staff fill?</td>
<td>Challenges vary depending on the position. A new technical position can take a minimum of six months to onboard, depending on current credentials. Other positions vary depending on the requirements of the position. Responses to positions also greatly vary with limited candidate pools of 4-6 to extensive candidate pools of 30+</td>
</tr>
</tbody>
</table>
### TRAINING AND TECHNICAL ASSISTANCE PLANNING

<table>
<thead>
<tr>
<th></th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Allocation:</td>
<td>$13,323,901</td>
</tr>
<tr>
<td>Local Training (SP Driven, including client ed)</td>
<td>$3,997,170</td>
</tr>
<tr>
<td>Grantee Training / Monitoring Staff &amp; Other Commerce Expenses</td>
<td>$6,522,731</td>
</tr>
<tr>
<td>COMMERCE CONTRACTED TRAINING</td>
<td>$2,804,000</td>
</tr>
<tr>
<td>Comprehensive Training</td>
<td>$300,000</td>
</tr>
<tr>
<td>Specific Training</td>
<td>$1,250,000</td>
</tr>
<tr>
<td>Client Education (SP Client Ed included in SP Alloc)</td>
<td>$100,000</td>
</tr>
<tr>
<td>Program Evaluation/IT</td>
<td>$250,000</td>
</tr>
<tr>
<td>Other (Special Projects)</td>
<td>$904,000</td>
</tr>
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#### PLANNING

<table>
<thead>
<tr>
<th>Training Topic(s)</th>
<th>Training Category</th>
<th>Type</th>
<th>Planned Year and Quarter</th>
<th>Training Center/Provider</th>
<th>Estimated Costs</th>
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</thead>
<tbody>
<tr>
<td>QCI Multi-family training</td>
<td>Technical</td>
<td>Comprehensive</td>
<td>PY 2022 Q3</td>
<td>Fond du Lac Tribal and Community College</td>
<td>$50,000.00</td>
</tr>
<tr>
<td>Additional BPI BA, HEP EA and QCI Certification Training</td>
<td>Technical</td>
<td>Comprehensive</td>
<td>PY 2022 Q3</td>
<td>Fond du Lac Tribal and Community College</td>
<td>$250,000.00</td>
</tr>
<tr>
<td>In-Progress Site Visit TTA</td>
<td>Technical</td>
<td>Specific</td>
<td>PY 2022 Q3</td>
<td>Affordable Energy Solutions</td>
<td>$30,000.00</td>
</tr>
<tr>
<td>Service Provider BIL Planning Workshops</td>
<td>Program</td>
<td>Specific</td>
<td>PY 2022 Q2</td>
<td>Affordable Energy Solutions</td>
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<tr>
<td>Technical Assistance Liason Multifamily</td>
<td>Technical</td>
<td>Specific</td>
<td>PY 2023 Q1</td>
<td>Affordable Energy Solutions</td>
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</tr>
<tr>
<td>Additional Mechanical Systems/CAZ Training</td>
<td>Technical</td>
<td>Specific</td>
<td>PY 2022 Q3</td>
<td>Affordable Energy Solutions</td>
<td></td>
</tr>
<tr>
<td>Client Education and Outreach resources and tool kit</td>
<td>Client Ed</td>
<td>Client Education</td>
<td>PY 2023 Q1</td>
<td>University of Minnesota - CSBR</td>
<td>$100,000.00</td>
</tr>
<tr>
<td>Crawlspace Barrier Pilot and Study</td>
<td>Program</td>
<td>Program Evaluation/IT</td>
<td>PY 2025 Start</td>
<td>University of Minnesota - CSBR</td>
<td>$50,000.00</td>
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<tr>
<td>Multiple Technical &amp; Leveraging &quot;Special Projects&quot; Detailed in the Special Projects Tab</td>
<td>Technical</td>
<td>Program Evaluation/IT</td>
<td>PY 2022 Q3</td>
<td>University of Minnesota - CSBR</td>
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<td></td>
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<tr>
<td>TOTAL COMMERCE COMPREHENSIVE TRAINING</td>
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<td>TOTAL COMMERCE SPECIFIC TRAINING</td>
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<td>TOTAL COMMERCE CLIENT EDUCATION</td>
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<td>TOTAL COMMERCE PROGRAM EVAL/IT</td>
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<tr>
<td>TOTAL SPECIAL PROJECTS (OTHER TAB)</td>
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<td>$904,000.00</td>
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<tr>
<td>Subgrantee</td>
<td>Current (WAP Base Funding)</td>
<td>Additional Monitoring Visit #</td>
<td>Level of Review</td>
<td>Monitoring Type</td>
<td>Review Type</td>
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<tr>
<td>----------------------------------------------------------</td>
<td>----------------------------</td>
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<td>-----------------</td>
<td>-----------------------------------------------------</td>
<td>-------------------------------------------</td>
</tr>
<tr>
<td>Arrowhead Economic Opportunity Agency</td>
<td>2 field visits+1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Bi-County Community Action Programs, Inc.</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Community Action Partnership of Ramsey &amp; Washington Counties</td>
<td>2 field visits+1 admin visit</td>
<td>1 additional field</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Dakota County Community Development Agency</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Fond du Lac Reservation Business Council</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Inter-County Community Council</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Kootasca Community Action, Inc.</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Lakes and Pines Community Action Council</td>
<td>1 field visit +1 admin visit</td>
<td>1 additional field (potential)</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin/ Fiscal</td>
</tr>
<tr>
<td>Mahube-Otwa Community Action Partnership, Inc.</td>
<td>2 field visits+1 admin visit</td>
<td>1 additional field (potential)</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Mille Lacs Band of Ojibwe Indians</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Minnesota Valley Action Council</td>
<td>2 field visits+1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Northwest Community Action, Inc.</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Prairie Five Community Action Council</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Semcac</td>
<td>2 field visits+1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Southwestern MN Opportunity Council</td>
<td>1 field visit +1 admin visit</td>
<td>Full Monitoring</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Sustainable Resources Center</td>
<td>2 field visits+1 admin visit</td>
<td>1 additional field</td>
<td>Full Monitoring</td>
<td>Field- Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
</tr>
<tr>
<td>Organization</td>
<td>Visit Type</td>
<td>Monitoring Type</td>
<td>Funding Source</td>
<td>Field/Q2 Admin/Q3 Fiscal</td>
<td>Field/Q2 Admin/Q3 Fiscal*</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
<td>------------</td>
<td>-----------------</td>
<td>----------------</td>
<td>--------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>Tri-County Community Action, Inc.</td>
<td>1 field +1 admin visit</td>
<td>Full Monitoring</td>
<td>Field/Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
<td>Field: Q2 Admin: Q3 Fiscal: TBD</td>
</tr>
<tr>
<td>Three Rivers Community Action</td>
<td>1 field +1 admin visit</td>
<td>Full Monitoring</td>
<td>Field/Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
<td>Field: Q3 Admin: Q4</td>
</tr>
<tr>
<td>Tri-County Action Program, Inc.</td>
<td>1 field +1 admin visit</td>
<td>Full Monitoring</td>
<td>Field/Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
<td>Field: Q4 Admin: Q4</td>
</tr>
<tr>
<td>United Community Action Partnership</td>
<td>2 field +1 admin visit</td>
<td>Full Monitoring</td>
<td>Field/Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
<td>Field: Q2 Admin: Q3 Fiscal: TBD</td>
</tr>
<tr>
<td>West Central Minnesota Community Action</td>
<td>1 field +1 admin visit + fiscal reconciliation</td>
<td>Full Monitoring</td>
<td>Field/Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
<td>Field: Q4 Admin: Q3</td>
</tr>
<tr>
<td>White Earth Reservation Tribal Council</td>
<td>1 field +1 admin visit</td>
<td>Full Monitoring</td>
<td>Field/Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
<td>Field: Q2 Admin: Q2</td>
</tr>
<tr>
<td>Wright County Community Action</td>
<td>1 field +1 admin visit</td>
<td>Full Monitoring</td>
<td>Field/Onsite/Admin Virtual/Fiscal Reconciliation</td>
<td>Field/Admin</td>
<td>Field: Q2 Admin: Q3</td>
</tr>
</tbody>
</table>

* Requested and still being negotiated with the fiscal team

<table>
<thead>
<tr>
<th>Title</th>
<th>Credentials</th>
<th>Type of Monitor</th>
<th>Funding Source</th>
<th>Staff/Contractor</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Example&quot; - Occupation Title</td>
<td>RIT/CL/EA/QCI /Other</td>
<td>Technical Monitor/Administrative Monitor</td>
<td>%TTA/%Admin</td>
<td>Staff/Contractor</td>
</tr>
<tr>
<td>Program Coordinator (NEW)</td>
<td>Administrative</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
<td></td>
</tr>
<tr>
<td>Program Administrator (SM)</td>
<td>Administrative</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
<td></td>
</tr>
<tr>
<td>Admin/Program Monitor (PD)</td>
<td>Administrative</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
<td></td>
</tr>
<tr>
<td>Technical Proficiency Coordinator (NEW)</td>
<td>QCI</td>
<td>Technical</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
</tr>
<tr>
<td>QA Monitor - Technical (PG)</td>
<td>QCI</td>
<td>Technical</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
</tr>
<tr>
<td>QA Monitor - Technical (RH)</td>
<td>QCI</td>
<td>Technical</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
</tr>
<tr>
<td>QA Monitor - Technical (IL)</td>
<td>QCI</td>
<td>Technical</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
</tr>
<tr>
<td>QA Monitor - Technical (MCG)</td>
<td>QCI</td>
<td>Technical</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
</tr>
<tr>
<td>QA Monitor - Technical (NEW)</td>
<td>QCI</td>
<td>Technical</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
</tr>
<tr>
<td>QA Monitor - Technical (NEW) - 4 years total</td>
<td>QCI</td>
<td>Technical</td>
<td>Detailed in Workforce Tab</td>
<td>Staff</td>
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</tbody>
</table>
### MILESTONE PLANNING

<table>
<thead>
<tr>
<th>T&amp;T/A</th>
<th>Start Date</th>
<th>End Date Goal</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Host up to six one to two-day workshops from January-Sept 2023 with the network and CERTs</td>
<td>1/1/2023</td>
<td>8/31/2023</td>
<td>Workshops for Service Providers to develop locally-driven plans around, at minimum: training, leveraging, production, and Justice40/equity. Includes BPI BA, HEP EA, HEP QCI, QCI Multi-family Gap Training. Will involve amending existing contract.</td>
</tr>
<tr>
<td>Establish all training contracts for full grant cycle. Develop Client Education Outreach and Resources and Tool Kit</td>
<td>12/1/2022</td>
<td>6/30/20224</td>
<td>amending existing contract.</td>
</tr>
<tr>
<td>Fund Crawlspace Ground Moisture Barrier Study Establish and Implement Remote Responsive and Mechanical Systems Training</td>
<td>3/1/2023</td>
<td>6/30/2024</td>
<td>Client education materials to expand services. Must encompass a full calendar year to account for weather differences in radon levels. Will involve amending existing contracts to develop additional training, above and beyond current base-funding scope.</td>
</tr>
</tbody>
</table>

### GRANTEE PROCUREMENT

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date Goal</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Execute Subgrantee contracts</td>
<td>1/1/2023</td>
<td>7/1/2027</td>
</tr>
<tr>
<td>Current SPs determine capacity to meet multi-family implementation.</td>
<td>7/1/2023</td>
<td>6/30/2024</td>
</tr>
<tr>
<td>Add Subgrantees/Modify Service Territories</td>
<td>7/1/2024</td>
<td>10/1/2024</td>
</tr>
<tr>
<td>Release RFPs (T&amp;T/A, QCI, IT, etc.)</td>
<td>11/1/2022</td>
<td>7/1/2025</td>
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### GRANTEE STAFFING: Hiring Plan

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date Goal</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Technical Proficiency Coordinator (NEW)</td>
<td>7/1/2022</td>
<td>10/1/2022</td>
</tr>
<tr>
<td>Equity, Innovation, &amp; Outreach Coordinator (NEW)</td>
<td>7/1/2022</td>
<td>10/1/2022</td>
</tr>
<tr>
<td>Program Coordinator (NEW)</td>
<td>7/1/2022</td>
<td>10/1/2022</td>
</tr>
<tr>
<td>Technical Field Trainer (NEW)</td>
<td>10/1/2022</td>
<td>3/1/2023</td>
</tr>
<tr>
<td>Training Contracts Administrator (NEW)</td>
<td>10/1/2022</td>
<td>3/1/2023</td>
</tr>
<tr>
<td>Systems Administrator (NEW)</td>
<td>10/1/2022</td>
<td>3/1/2023</td>
</tr>
<tr>
<td>QA Monitor - Technical (NEW)</td>
<td>3/1/2023</td>
<td>7/1/2023</td>
</tr>
<tr>
<td>Senior PM: Utility+ Partnerships (NEW)</td>
<td>3/1/2023</td>
<td>7/1/2023</td>
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<tr>
<td>Management Analyst (NEW)</td>
<td>3/1/2023</td>
<td>7/1/2023</td>
</tr>
<tr>
<td>QA Monitor - Technical (NEW) - 4 years total</td>
<td>3/1/2023</td>
<td>7/1/2024</td>
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### SUBGRANTEE NETWORK

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<tr>
<th>Start Date</th>
<th>End Date Goal</th>
<th>Comments</th>
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<tr>
<td>Hiring of new staff</td>
<td>1/1/2023</td>
<td>8/31/2023</td>
</tr>
<tr>
<td>Procure contractors</td>
<td>1/1/2023</td>
<td>8/31/2023</td>
</tr>
<tr>
<td>Procure vehicles and equipment</td>
<td>1/1/2023</td>
<td>8/31/2023</td>
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</table>

### SYSTEMS/INFORMATION MANAGEMENT

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date Goal</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAP reporting systems</td>
<td>10/1/2022</td>
<td>6/30/2023</td>
</tr>
<tr>
<td>Program Management Software Tool to track energy audit data, project management, procurement, spending, monitoring etc.</td>
<td>10/1/2022</td>
<td>6/30/2023</td>
</tr>
<tr>
<td>LMS Expansion - Training Pathways</td>
<td>1/1/2023</td>
<td>6/30/2027</td>
</tr>
<tr>
<td>LMS Customization and Coordination</td>
<td>1/1/2023</td>
<td>6/30/2027</td>
</tr>
<tr>
<td>Develop a contractor-SP portal</td>
<td>10/1/2022</td>
<td>9/30/2023</td>
</tr>
<tr>
<td>Equity &quot;WAPMAP&quot; Database Development, Rollout, &amp; Maintenance</td>
<td>10/1/2022</td>
<td>6/30/2023</td>
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### LEVERAGING RESOURCES

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date Goal</th>
<th>Comments</th>
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</thead>
<tbody>
<tr>
<td>Weatherization Working Group</td>
<td>9/1/2023</td>
<td>12/1/2024</td>
</tr>
<tr>
<td>Policy Advisory Council Expansion</td>
<td>1/1/2023</td>
<td>8/31/2023</td>
</tr>
<tr>
<td>Contact Resource Management Development</td>
<td>10/1/2022</td>
<td>6/30/2023</td>
</tr>
<tr>
<td>Communication/Outreach Development</td>
<td>1/1/2023</td>
<td>8/31/2023</td>
</tr>
<tr>
<td>Volunteer/AmeriCorps Support</td>
<td>6/1/2023</td>
<td>6/30/2027</td>
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### PRODUCTION & ANALYSIS

<table>
<thead>
<tr>
<th>Start Date</th>
<th>End Date Goal</th>
<th>Comments</th>
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</thead>
<tbody>
<tr>
<td>30% of total estimated units weatherized</td>
<td>9/1/2023</td>
<td>8/31/2025</td>
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Host Program Analysis

7/1/2025  9/30/2027 Analyze impact of WAP-BIL funding
<table>
<thead>
<tr>
<th>Project Title</th>
<th>Category</th>
<th>Organizations/Partners/People Involved</th>
<th>Resources</th>
<th>Funding Type</th>
<th>Estimated Cost</th>
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<tbody>
<tr>
<td>Program Management Software Tool</td>
<td>Technology</td>
<td>Grantee staff, Subgrantee staff and Contractors</td>
<td>Stabilization: financial,</td>
<td>T&amp;TA</td>
<td>$190,000</td>
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<tr>
<td>Contractor Portal</td>
<td>Technology</td>
<td>State Led- coordination of matching of contractors and SPs</td>
<td>T&amp;TA</td>
<td></td>
<td>$75,000</td>
</tr>
<tr>
<td>LMS Customization and Coordination</td>
<td>Technology</td>
<td>State Administered Learning Management System for Subgrantee staff and Contractors Customization</td>
<td>T&amp;TA</td>
<td></td>
<td>$200,000</td>
</tr>
<tr>
<td>LMS Expansion - Training Pathways</td>
<td>Technology</td>
<td>State Administered Learning Management System for Subgrantee staff and Contractors with Learning Pathways for clear training protocol of new WAP staff hires statewide</td>
<td>T&amp;TA</td>
<td></td>
<td>$439,000</td>
</tr>
<tr>
<td>WAPMAP Expansion</td>
<td>Technology</td>
<td>Equity “WAPMAP” Database Development, Rollout, &amp; Maintenance</td>
<td>Leveraging</td>
<td></td>
<td>$207,471</td>
</tr>
<tr>
<td>Leveraging Outreach Materials</td>
<td>Technology</td>
<td>Leveraging Resources (technology - videos, communication pieces, and partnership outreach needs)</td>
<td>Leveraging</td>
<td></td>
<td>$100,000</td>
</tr>
<tr>
<td>CRM Development</td>
<td>Technology</td>
<td>Contact Resource Management System development</td>
<td>Leveraging</td>
<td></td>
<td>$250,000</td>
</tr>
<tr>
<td>Weatherization Working Group</td>
<td>Partnerships</td>
<td>Ongoing expanded partnership/leveraging meetings (cost for facilitation and stipends)</td>
<td>Leveraging</td>
<td></td>
<td>$250,000</td>
</tr>
<tr>
<td>Leveraging Measures Analysis</td>
<td>Analysis</td>
<td>Analysis of potential measures for expanded services with US DOE or other leveraged resources.</td>
<td>Leveraging</td>
<td></td>
<td>$90,000</td>
</tr>
<tr>
<td>Volunteer leveraging stipends</td>
<td>Partnerships</td>
<td>Americorp members - or similar - working at Grantee and Subgrantee (MN PCA Green Corps, Ampact, or other local resource) as well as PAC Representation Stipeds</td>
<td>Leveraging</td>
<td></td>
<td>$600,000</td>
</tr>
<tr>
<td><strong>TOTAL COMMERCE TTA: Special Projects</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$904,000</strong></td>
</tr>
<tr>
<td><strong>TOTAL COMMERCE LEVERAGING: Special Projects</strong></td>
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<td><strong>$1,497,471</strong></td>
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PAC WAP-BIL Funding and Strengthening the Group

Becky Billings
Brian Edstrom (CUB)
Kris Perendy
Laura Milbrandt
Anthony Fryer
Jason Foy
Jeff Gladis
Lissa Pawlish
Mari Ojeda
Kevin Brauer
Joan Markon (Fond du Lac)

Feedback

With retirements etc, how do we ensure training and ongoing in-progress needs are met.

- Budget and Production: beginning in 2023, hoping to have 4,653 HH served overall.
- Broad ACPU isn’t changing. That determines how the allocation breakout happens

Typically FDL gets 2 houses. How does the allocation change?

- DOE funded portion will likely double based on the estimated funding
- ARRA gave significant funding to FDL

FLD was working on a MF unit before COVID (senior housing). Is that going to be coming from a different funding source or the same?
• Likely the same source, but we’ve had changes in eligibility for MF jobs, and FDL should work with Commerce to decide
  o Tribal building on Tribal land. Never been done before
• Underutilized PAC group
  o What representation is missing?
    ▪ Health field representation
      ▪ Hospital admin or someone from a larger group of the health field
      ▪ Allergies or childhood wellness
    ▪ Housing regulatory associations
    ▪ More diverse representation
    ▪ State investors association or real estate community
      ▪ Not talking to anyone directly related to Multifamily
      ▪ Consider looking into this group or going to speak: https://www.mnreia.com/Default.aspx
    ▪ An advocate to weatherization or someone who was a previous client
    ▪ Seniors or people with disabilities
    ▪ Someone from MDH
    ▪ Municipal utility or municipal aggregator would be a good addition.
  o What processes should be used to add members?
    ▪ Orientation, best practices, shared values documentation
    ▪ Preemptive meeting before people start on PAC. Get them oriented to understand what the goal is and how it relates to the program
    ▪ Look for people throughout the state, not just in the metro
  o Should there be a time limit or other structure for participation?
    ▪ Maybe not necessarily a time limit, but better structure for understanding would be good
    ▪ We need to build comfort in the feedback of this group
    ▪ Disconnect has worsened during the pandemic. In-person meeting would be great
    ▪ Maybe send some prior discussion points or questions to discuss during the meeting.
PAC Meeting 8/30/2022

**Attendees**

Jason Foy
Suzy Meneguzzo
Kevin Brauer
Jeff Gladis
Mari Ojeda
Carter Dedolph Jr.
Katherine Teiken
Michelle Gransee
Sofia Troutman
Kris Perendy

**Notes**

35% release in November or December, upon approval of the plan

Network and data reflect that the way WX implementation happens based on DOE causes program inequities based on prioritization, cost of travel, and other factors.
Justice40 Map

Initial map of Justice40 didn’t include anything about racial equity. With knowledge of redlining history in Minnesota, we recognize this is a gap.

- Tribal nations were accounted for, though tribal communities might not all be recognized
- CEC recognized that some diverse communities were not included in the map.
- Looking to yes/and response from Justice40 offices
- Within the groups identified as disadvantaged communities, WX services must still adhere to program requirements. What opportunities as a state do we have to partner for programs that can’t access WX?
  - What other programs or things could I access at the same time as WX services while families are going through the motions?
  - X amount can be set forth and dedicated to wrap-around services. Commerce can present broad themes in the proposal—it doesn’t have to be specific

WAPMAP

- Overlay data of demographics in Minnesota
- Everywhere we’ve provided service
- Internal ability to access details about service rates across the state.

How do we find the key leaders in community groups with lots of influence?

- Walnut Grove, met with leaders of Hmong community and gained lots of trust in the community.
- DOE is encouraging this cause, and Commerce recognizes the need.
- Outreach is a key component of State Plan and is continued to be a priority for local level partnerships and leadership connections

Energy navigators:

- Looking at providing resources for local leaders and contacts related to energy efficiency? Cross-organizational resource.

CEC August 16th meeting has a NY visitor coming to talk about compensation models for equitable relationships. Michael Duramio (sp?)
- Xcel energy perspective is more mindful and open to relationship-building
Commerce is hiring 3 coordinator level positions, and expects to hire several additional staff later on. This could potentially be related to wrap-around services

**Utilities**

Utilities requirements for spending on low-income programs.

- 6 million, or a large amount is going to WAP
- $500,000 could be leveraged from CenterPoint
- HealthyAIR funding has been an example of coordination with utility dollars and partnership.
- Continue to build upon this in the plan
- Leveraging health and safety funds from Xcel has allowed for more job completions (HES program)
- Xcel is conducting a two-year research study and intends to share for plan references
- Surveys are part of evaluation process

How do we connect with other organizations that are being engaged with as stakeholders?

**Client**

How much in-depth are we getting firsthand knowledge of the stakeholder spaces?

- Service provider survey to go out prior to the 18th
- WX FAQ sheet, steps that went through your home
- One-sheet at the beginning about what to expect
- Surveys about what works well and what isn’t
- Contractor and auditor surveys
- Timelines and what to expect before, then a survey and a post-work recap

**Climate action Framework Process**

- Feedback to a general email address
- Open format to give feedback. Maybe a survey?
- Client champions? Showcase really successful clients or people who had really positive experiences with WX
- Most surveyed participants do not have interest in sharing their stories.
- How do we continue to encourage participants to share their stories?

Re: when clients review case studies, they may want to have theirs added (anonymous as needed)