

Nebraska
Department of
Environment and Energy
Weatherization Assistance Program

Program Year 2019 State Plan
July 1, 2019 – June 30, 2020

Department of Environment and Energy

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WEATHERIZATION ASSISTANCE PROGRAM
STATE PLAN – 2019 PROGRAM YEAR
July 1, 2019 – June 30, 2020

Executive Summary

The Nebraska State Weatherization Assistance Program (WAP) Plan for Program Year (PY) 2019 serves as Nebraska’s application to the US Department of Energy (USDOE) for WAP funding. These funds will provide assistance to approximately two hundred and thirty (230) households across the State.

The purpose of the Program is to install energy conservation measures in the homes of income-eligible persons, especially homes occupied by the elderly, persons with disabilities, and families with children. Funds are targeted to the most cost-effective energy efficiency measures, as determined by an on-site energy audit of the eligible building. The program helps to reduce national energy consumption and related emissions and lessens the impact of higher energy costs for low-income families. The program also improves the health and safety (H & S) of assisted households.

Nebraska relies on a network of seven (7) Subgrantee Community Action Partnerships (CAP) and one (1) non-profit agency, all which have an extensive experience in delivering weatherization and affordable housing services in their designated service areas. Subgrantees provide energy efficiency weatherization services using their own trained crews and by subcontracting work to qualified contractors. Energy efficiency measures financed through the program can range from air sealing and insulating to replacement of heating systems. The program assists all types of housing units, including single- and multifamily housing, manufactured housing, and group homes. The Nebraska Department of Environment and Energy (NDEE) will allocate program funds for the PY2019 in accordance with this plan.

I.1 Budget

2019 Program Year Allocation – USDOE	\$2,853,612.00
2018 Program Year projected carryover	\$0.00
Training and Technical Assistance	\$488,975.00
Nebraska Department of Environment and Energy Administration	\$142,681.00
Subgrantee Administration	\$233,672.00
CPA Audits	\$12,000.00
Liability Insurance	\$23,198.00
Health and Safety (18%)	\$344,795.00
Program Operations	\$1,608,291.00

The activities described in the State WAP Plan are subject to final approval of appropriations to the U.S. Department of Energy and receipt of federal funding the Nebraska Department of Environment and Energy. The Nebraska Department of Environment and Energy reserves the right to modify or withdraw the State WAP Plan if and to the extent such funding is not received.

I.2 Proposed Weatherization Projects

USDOE

Allocation

Subgrantee

PY2019

Blue Valley Community Action Partnership	\$175,493.19
Central Nebraska Community Action Partnership	\$302,565.67
Northeast NE Community Action Partnership	\$333,947.07
Community Action Partnership of Lancaster & Saunders Counties	\$280,245.12
Community Action Partnership of Mid Nebraska	\$349,637.75
Northwest Community Action Partnership	\$228,532.13
Southeast Nebraska Community Action Partnership	\$149,415.70
Habitat for Humanity of Omaha	\$499,914.77

I.3 Summary of Major Changes for the 2019 Program Year

Nebraska has not limited H&S investment to a per-unit cost, but instead has allocated between 15-20 percent of its annual allocations to cover H&S-related expenditures. In PY2019, a per dwelling unit limit for H & S expenditures of \$1,500 has been established, based on historical data. Units that exceed the \$1,500 limit must receive approval from NDEE on a case-by-case basis.

IV.1 Subgrantee

In accordance with 10 CFR Part 440, an entity that receives funds from the Department of Environment and Energy to manage a weatherization project is considered a WAP Subgrantee. The Department of Environment and Energy enters into a Financial Assistance Subaward with Subgrantees to perform WAP services within specified service areas throughout the State.

Blue Valley Community Action Partnership

PO Box 273
620 5th Street
Fairbury, NE 68352

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Kelly Davis Email: kdavis@bvca.net

Phone: 402-729-2278 Fax: 402-729-2801

Counties Served: Butler Fillmore Gage
 Jefferson Polk Saline
 Seward Thayer York

PY2019

USDOE Allocation: \$175,493.19

Minimum Units: 17

Congressional districts served and	<u>Congressional District (CD)</u>	<u>Percent</u>
percent of Subgrantee allocation:	01	69%
	03	31%

Central Nebraska Community Action Partnership

PO Box 509
626 N. Street
Loup City, NE 68853

Type of Organization: Community Action Partnership agency

Source of Labor: Crews

Contact: Amber Beck Email: abeck@centralnebraskacap.org

Phone: 308-745-0780 Fax: 308-745-0824

Minimum Units: 33

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	01	78%
	03	22%

Community Action Partnership of Lancaster and Saunders Counties

210 "O" Street
Lincoln, NE 68508

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors

Contact: Vi See Email: vsee@communityactionatwork.org

Phone: 402-471-4515 Fax: 402-471-4844

Counties Served: Lancaster Saunders

PY2019

USDOE Allocation: \$280,245.12

Minimum Units: 28

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	01	100%

Community Action Partnership of Mid Nebraska

PO Box 2288
16 W 11th Street
Kearney, NE 68848-7440

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Jackie Harpst Email: jharpst@mnca.net

Phone: 308-865-5675 Fax: 308-865-5681

Counties Served: Adams Arthur Buffalo Chase Clay
 Dawson Dundy Franklin Frontier Furnas
 Gosper Grant Harlan Hayes Hitchcock

Hooker Kearney Keith Lincoln Logan
McPherson Nuckolls Perkins Phelps Red Willow
Thomas Webster

PY2019

USDOE Allocation: \$349,637.75

Minimum Units: 34

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	03	100%

Northwest Community Action Partnership

270 Pine Street
Chadron, NE 69337

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Floyd Merkel Email: fmerkel@ncap.info

Phone: 308-432-3393 Fax: 308-432-5799

Counties Served:	Banner	Box Butte	Cherry	Cheyenne	Dawes
	Deuel	Garden	Kimball	Morrill	Scotts Bluff
	Sheridan	Sioux			

PY2019

USDOE Allocation: \$228,532.13

Minimum Units: 22

Congressional districts served and	CD	Percent
percent of Subgrantee allocation:	03	100%

Southeast Nebraska Community Action Partnership

P.O. Box 646
802 4th Street
Humboldt, NE 68376

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors

Contact: Gin Christiansen Email: gchristiansen@senca.org

Phone: 402-862-2411 ext.116

Fax: 402-862-2428

Counties Served: Cass Johnson Nemaha Otoe
Pawnee Richardson Sarpy

PY2019

USDOE Allocation: \$149,415.70

Minimum Units: 14

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	01	42%
	02	49%
	03	9%

Habitat for Humanity of Omaha

1701 N 24th Street
Omaha, NE 68110

Type of Organization: 501(C)3 Non-profit entity

Source of Labor: Contractor

Contact: Danyelle Baratta Email: dbaratta@hatitaomaha.org

Phone: 402-884-6626 Fax: 402-457-4012

Counties Served: Douglas
PY2019

USDOE Allocation: \$499,914.77

Minimum Units: 52

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	02	100%

IV.2 WAP Production Schedule

PY2019

Average Unit Costs Including Re-weatherization \$7,541.00

Total Funds – Federal	\$2,853,612.00
Total Carryover	\$0.00
Total Units to be Weatherized	209
Total Units to be Re-weatherized	21
Total Units to be weatherized and Re-weatherized	230
Total Vehicle and Equipment Budget	\$55,000.00
Average Vehicle and Acquisition Cost Per Unit	\$0.00
Total Funds for Program Operations	\$1,608,291.00

IV.3 Energy Savings & Program Impact

Method Used to Calculate Savings: WAP Algorithm

Estimated Energy Savings: 29.3 MBtus per completed unit. Total annual estimated energy savings resulting from USDOE appropriated funds: 6,358 MBtus.

IV.4 USDOE-Funded Leveraging Activities

No leveraged funds are identified for this program year.

IV.5 Policy Advisory Council Members

As required by federal regulations, a Policy Advisory Council (PAC) assists in the development and implementation of the WAP and advises the Department of Environment and Energy on a broad range of issues relating to WAP. The PAC is broadly representative of organizations that provide services to low-income persons in Nebraska.

<u>Member</u>	<u>Representing</u>
Matt Thomsen	Elderly Nebraskans – Nebraska Department of Health & Human Services
Ashley Frevert	Low Income Nebraskans – Community Action Nebraska
Karen Wobig	Elderly & Children (under six) – Lancaster County Extension Service
Jerry Bryan	Disabled -Nebraska Client Assistance Program
Ken Inness	Low Income Housing - Prairie Gold Homes
Steve Zach	Utility - Nebraska Public Power District
Lynn Kohout	Low-income, elderly, persons with disability - Nebraska Department of Economic Development

IV.6 State Plan Hearings and Transcripts

A public hearing was held to receive public input on the PY2019 State Plan at [10:00 am Monday, April 22, 2019] at the Nebraska Department of Environment and Energy. Notice of the meeting was published in the Omaha World Herald and posted on the State of Nebraska Department of Administrative Services Public meetings website at <https://www.nebraska.gov/calendar/index.cgi> on March 20, 2019. **It was distributed via email to all WAP program managers and agency executive directors, and posted on the Nebraska Department of Environment and Energy website. There were no comments made during the public hearing.**

IV.7 MiscellaNDEEus

Other Funding Sources

Low Income Home Energy Assistance Program (LIHEAP) funds have been directed into the weatherization program since 1982. The amount of LIHEAP funds available for weatherization during the PY 2019 are \$2,610,000.00 (Two million six hundred ten thousand dollars and zero cents). LIHEAP funds are used in accordance with all applicable USDHHS and Nebraska Department of Health and Human Services State Plan rules and regulations.

Subgrantee Involved in the Leveraging Process

Most Nebraska Subgrantees operate other housing assistance programs that enable them to leverage resources from other funding sources.

Liability Insurance

Subgrantees that employ private contractor labor to perform Weatherization services must ensure that each private contractor is adequately insured.

V.1 Eligibility

Every dwelling weatherized must meet both the client eligibility and the building eligibility requirements.

V.1.1 Approach to Determining Client Eligibility

Definition of Income Used to Determine Eligibility (Client Eligibility)

In accordance with USDOE Weatherization Program Notice 19-3, effective as of February 6, 2019, Low income will mean that income in relation to family size, which: (1) is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, or (2) is the basis on which cash assistance payments have been paid at any time during the preceding twelve months under Titles IV and XVI of the Social Security Act, or (3) is the basis on which energy assistance payments have been paid under the Low Income Home Energy Assistance Program of 1981(LIHEAP), provided that such basis is at least 200 percent of the poverty level

determined in accordance with the criteria established by the Director of the Office of Management and Budget.

- Subgrantees are reminded that the supporting documentation for applicants applying for weatherization that may be on a waiting list or for other reasons must have their eligibility documentation updated at least annually.

Procedures to Determine That Units Weatherized Have Eligibility Documentation (Household Eligibility)

All dwelling units certified as eligible for services shall be occupied by an income-eligible household family unit with income at or below 200 percent of the poverty level, or "which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law during the twelve month period preceding the determination of eligibility for weatherization assistance," or which contains a member which has received energy assistance payments under the LIHEAP during the twelve month period preceding the determination of eligibility for weatherization assistance.

Qualified Aliens Receiving Weatherization Benefits:

Subgrantees must request documentation from WAP applicants and verify eligibility status through the Systematic Alien Verification for Entitlements (SAVE) Program. Such documentation can be provided to NDEE staff for eligibility verification.

The SAVE Program is a web-based service that helps federal, state and local benefit-issuing agencies, institutions, and licensing agencies determine the immigration status of benefit applicants so only those entitled to benefits receive them.

USDOE has directed grantees to guidance provided by Health and Human Services (HHS) under LIHEAP. This guidance can be found by going to <http://aspe.hhs.gov/hsp/immigration/restrictions-sum.shtml>. The Department of Environment and Energy registered for the SAVE Program to verify qualified alien status of Weatherization Program applicants for sub-grantees. Sub-grantees submit the required information to the Department of Environment and Energy who completes the verification process. The verification documentation is required as part of the Subgrantee Client Files.

V.1.2 Approach to Determining Building Eligibility

Procedures to Determine that Units Weatherized Have Eligibility Documentation

Subgrantees are required to keep documentation in each client file for review during Program Compliance and Onsite Project monitoring visits by Department of Environment and Energy WAP staff. A minimum of 20 client files will be reviewed at each Subgrantee during Program Compliance monitoring to assess compliance with this requirement.

Reweatherization Compliance

Homes weatherized on or before September 30, 1994 are eligible for reweatherization 42 USC 6865(c)(2). If a previously weatherized dwelling unit has been damaged by fire, flood, natural catastrophic weather or environmental occurrence, weatherization crews may return to a unit reported

as a completion without regard to date of weatherization. 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation. The use of USDOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials (WPN 16-7). No more than ten (10) percent of a Subgrantee's USDOE completions may be reweatherized without prior approval from the Department of Environment and Energy.

DOE issued WPN 12-7 to address Disaster Planning and Relief, which provides a framework for reweatherization of homes on or after September 30, 1994 or later due to natural disaster. Please refer to WPN 12-7 and follow appropriate procedures if the Grantee wishes to serve homes located in disaster areas.

Addresses of completed weatherized units and dates they were completed are tracked by Subgrantees through the NDEE database system. Each agency references new applications to that database to comply with re-weatherization regulations in 10 CFR 440.18(f)(2)(iii) Allowable expenditures. The Department of Environment and Energy also uses a database to track WAP clients and retains client BCJO files for completed units for ten years. The database is used to cross-reference submitted completed units to already completed units. Subgrantees are also responsible to let the Department of Environment and Energy know when a unit is a re-weatherized unit.

Building Eligibility – Housing Types

Eligible housing types include owner and renter-occupied single-family homes, manufactured (mobile) homes, and multifamily buildings.

Historic Preservation

On March 17, 2010, the NDEE entered into a Programmatic Agreement (PA) with the Nebraska State Historical Preservation Office (NSHPO) and the USDOE. Properties funded under the WAP are considered "undertakings" subject to review under Section 106 of the National Historic Preservation Act, 16 U.S.C. 470f (NHPA) and its implementing regulations at 36 CFR 800, and include rehabilitation, energy efficiency, retrofits, renewables, and weatherization (undertakings). SHPO contact information is available at the following link: <http://www.ncshpo.org/shpodirectory.shtml> click on the State of Nebraska to find the Nebraska SHPO contact information. *Federal Register/Vol. 78, No. 50/Thursday, March 14, 2013/Notices extended PAs from a duration of three years to December 31, 2020.*

Section 110(k) of the NHPA applies to USDOE funded activities. Recipients shall avoid taking any action that results in an adverse effect to historic properties pending compliance with Section 106. Dwellings that may be weatherized include:

1. Framed Homes
 - a. Single family owner-occupied
 - b. Single family rental
 - c. Multi-family dwellings
2. Manufactured Homes
 - a. Owner-occupied
 - b. Renter-occupied

Priority will be given to the weatherization of single-family or other high energy-consuming dwelling units.

Rental and Multifamily Building Procedures

References to the specific eligibility of multifamily buildings is addressed in the regulations, 10 CFR 440.22(b)(2). Additional USDOE guidance can be found in USDOE Weatherization Program Notice 16-5.

Rental units may be weatherized when occupied by an eligible client; and

- The Subgrantee has written permission from the owner or his agent. Such written permission shall be permanently maintained in the file of the client whose unit is weatherized.
- The benefits of weatherization assistance will accrue primarily to low-income tenants.
- Not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building are occupied by eligible clients or will become occupied by eligible clients within 180 days under a Federal, State, or local program for rehabilitating the building or making similar improvements to the building.
- The Subgrantee must obtain and place in the client file a signed agreement from the landlord (or authorized agent of the landlord) that states that for a minimum of 12 months after weatherization work has been completed on a dwelling, the tenants in that dwelling will not be subjected to rent increases because of the increased value of dwelling units due solely to weatherization assistance provided under this part.
- No undue or excessive enhancement shall occur to the value of the dwelling units.
- In the event of a dispute between the tenant and property owner regarding the issues listed above, the Subgrantee will attempt to resolve the dispute; if that fails, the tenant will be referred to legal aid by the Subgrantee.
- In the case of a vacant rental dwelling, weatherization assistance may be provided if there is assurance that a low-income household will inhabit the dwelling within 180 days of the date the weatherization service was completed.
- Subgrantee has provided copies of the signed Landlord Agreements to the tenants and ensure that documentation is placed in the Subgrantee Client File.

The Nebraska WAP does not file liens or enforce restrictions.

Under 10 CFR 440.18(f)(1): No grant funds awarded under this part shall be used for any of the following purposes; To weatherize a dwelling unit which is designated for acquisition or clearance by a Federal, State or local program within 12 months from the date weatherization of the dwelling unit would be scheduled to be completed.

Multi-family Buildings

The total amount of funds that can be invested in a multi-family project is determined as follows: Multiply the total number of income-eligible units in the multi-family building by the current statewide average cost per unit. The total is the maximum amount of USDOE funding available to weatherize the building. All units in the building can be served and all units should be reported to USDOE. Sub-grantees must submit multi-family projects greater than 24 units to the Department of Environment and Energy for review and approval before work begins and costs are incurred. The Department of Environment and Energy reviews the proposed project and submits to the USDOE Program Office as per the Multi-Family Review Protocol.

Deferral Process

There are conditions and situations under which a Subgrantee must not or may choose not to weatherize an otherwise eligible dwelling unit. Information for making this determination may become evident during either the eligibility process or during the initial inspection process. The Nebraska WAP Deferral policy is part of the Health & Safety plan found in the Nebraska Weatherization Field Guide and Installation Standards, Section 2 Health & Safety.

V.1.3 Definition of Children

Children are defined as those individuals under the age of six.

V.1.4 Approach to Tribal Organizations

Low-income members of Indian tribes will receive benefits equivalent to the assistance provided to other low-income persons within Nebraska.

V.2 Selection of Areas to be Served

Current service areas are predominantly based upon the historic boundaries of the state CAP agencies. This was done for two reasons. First, Nebraska Subgrantee CAP agencies in general, operate within boundaries that best serve the clients they serve through multiple assistance programs. Second, this approach enables CAPs to use existing outreach structures to recruit eligible clients. However, the State reserves the right to re-designate weatherization service areas during a program year should production of homes or service to eligible clients become deficient in any given service area for the WAP.

The Department of Environment and Energy reserves the right to operate, on a temporary basis, the Weatherization Program in the territory of any defunded Subgrantee. This will be done to ensure continued service to an area during the search for a new Subgrantee.

Formula to calculate Subgrantees allocation

Weighted average based on population.

{Population (C)}

{200% of Poverty (C)}

{Poverty(C)}

{Elderly(C)}

0.1 X {Population (S)} + 0.2 X {200% of Poverty (S)} + 0.3 X {Poverty (S)} + 0.4 X {Elderly (S)}

C = County S= State

Subgrantees under the WAP were required to notify the NDEE by January 18, 2019 of their interest in continuing as a service provider for the program year beginning July 1 of that year. At the time of submitting Subgrantee letter of intents to provide weatherization service in their specific counties, they will also submit any changes to: Articles of Incorporation, Mission Statement, key agency personnel, Board of Directors and representation, organizational chart, and proposed staffing levels. The application must also address:

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

For PY2019 Subgrantees notification of intent will be the written notification to serve the counties they submitted in their most recent Request for Proposal (RFP) for applications. At the time of the submission of the letter of intent, they will also provide any changes that were submitted in the RFP applications that would apply to PY2019.

V.3 Priorities for Service Delivery

Eligible clients will receive weatherization assistance in Nebraska according to the following priorities:

1. Persons over 60 years of age;
2. Persons with disabilities;
3. Families with children under 6 years old;
4. High residential energy users; and
5. Households with a high-energy burden.

Subgrantees must serve clients according to date of application submission, by priority, and by county. As a rule, within an individual county, a lower priority client should never be served prior to a higher priority client unless the higher priority client was not available during the available time period. Subgrantees must document irregularities in the selection of clients when a high priority client is not available.

As defined in 10 CFR 440, the term Persons with Disabilities means any individual (1) who is a handicapped individual as defined in section 7(6) of the Rehabilitation Act of 1973, (2) who is under a disability as defined in section 1614(a)(3)(A) or 223(d)(1) of the Social Security Act or in section 102(7) of the Developmental Disabilities Services and Facilities Construction Act, or (3) who is receiving benefits under chapter 11 or 15 of title 38, U.S.C.

As defined in 10 CFR 440.3, high residential energy user means a low-income household whose residential energy expenditures exceed the median level of residential expenditures for all low-income households in the state.

As defined in 10 CFR 440.3 household with a high-energy burden means a low-income household whose residential energy burden (residential expenditures divided by the annual income of that household times one hundred (100) percent exceeds the median level of energy burden for all low-income households in the state.

Prioritization of Single Family Homes and High Energy Users

Single-family homes remain the primary target of the Nebraska WAP. Subgrantees have been authorized to develop procedures to prioritize client households based on their energy burden.

Climatic Conditions

Total heating degree-days in Nebraska range from a high of 7151 in the northcentral region of the State to a low of 5844 in Southeast region of Nebraska. The average heating degree-days have been supplied by the National Oceanic and Atmospheric Administration. Site-specific weather data is used in application of the NEAT audit. The average heating degree-days for each Subgrantee are set out below:

Blue Valley Community Action Partnership (Lincoln)	6056
Central Nebraska Community Services (O'Neill)	7151
Northeast NE Community Action Partnership (Norfolk)	6643
Community Action Partnership of Lancaster & Saunders Counties (Lincoln)	6056
Community Action Partnership of Mid Nebraska (North Platte)	6686
Northwest Community Action Partnership (Chadron)	6775
Southeast NE Community Action Partnership (Pawnee City)	5844
Habitat for Humanity of Omaha (Omaha)	6506

V.4 Types of Weatherization Measures to be Done

As a result of experience and research in weatherizing several thousand site-built and mobile homes in Nebraska, including substantial use of the National Energy Audit Tool (NEAT) and the Mobile Home Energy Audit (MHEA), weatherization measures are mandated for use by all Subgrantees under contract with the NDEE to perform weatherization in Nebraska. The primary goal of the weatherization program remains the conservation of energy with emphasis on insulation, furnace replacement, and air sealing.

FRAME HOUSING

Health and Safety Measures

General Heat Loss Measures

Envelope Insulation Measures

Baseload Measures

MANUFACTURED HOMES

Health and Safety Measures

General Heat Loss Measures

Envelope Insulation Measures

Baseload Measures

V.4.1 Technical Guides and Materials

In Program Year 2019, the Nebraska WAP network will utilize the 2018 Retrofitting Nebraska: Standard Work Specifications for Single Family Homes and Manufactured Homes along with the Installation Standards for Single Family and Manufactured Homes that were issued to Subgrantees in May of 2018. NDEE informed Subgrantees at that time of the expectations for work quality and adherence to the Field Guide and Installation Standards. NDEE implemented the Nebraska Field Guide and Installation Standards after approval by the Department of Energy in Program Year 2018 and will be in effect for three (3) years as Nebraska's technical guides. The Nebraska Field Guide and Installation Standards manual aligns with the USDOE Standard Work Specifications and are the work quality standards that will meet the technical requirements for the WAP outlined in USDOE WPN 15-4, Section 2 and 10 CFR 440.

Each Subgrantee, by signing their Financial Aid Agreement with NDEE, agrees they understand the expectations of the Nebraska Field Guide and Installation Standards, USDOE WPN 15-4, energy audit procedures and 10 CFR 440 including Appendix A. By signing this agreement Subgrantees will also be acknowledging that they will include these expectations within their contract agreements.

The approved Nebraska Field Guide and Installation Standards are available on the Department of Environment and Energy Weatherization website for Subgrantees to provide downloadable Installation Standards to crews and contract vendors. For in-network WAP Directors, Managers or Certified Quality Control Inspectors employees the Department of Environment and Energy provides the Field Guides and Installation Standards in pdf and e-pub format for either iPads or Tablet Readers. All contract vendors must provide their own electronic reader to download the Field Guides & Installation Standards.

Subgrantees must provide a mechanism through their contractual agreements verifying that vendors understand and agree to the terms and usage of the Field Guides and Installation Standards and all USDOE installation requirements.

V.4.2 Energy Audit Procedures

Approval of Energy Audit Procedures

On June 2, 2016, NDEE received USDOE approval of its audit procedures for site built and for certain small multifamily buildings using the NEAT and for manufactured homes using the MHEA. Both audit tools are already USDOE approved to calculate savings-to-investment (SIR) ratios. NDEE followed the latest WPN 19-4 guidance to comply with 10 CFR 440 for re-approval.

Single Family -- National Energy Audit (NEAT)

The National Energy Audit (NEAT) has been adopted by the Nebraska weatherization program. The U.S. Department of Energy's most recent approved Nebraska's Audit procedures with added User Defined measures was on June 2, 2016. Site-specific audits must be run on all single-family frame homes for all homes weatherized with Nebraska WAP funds.

Manufactured Housing - Mobile Home Energy Audit (MHEA)

Nebraska has chosen to utilize the Manufactured Home Energy Audit (MHEA). Site-specific audits must be completed on all mobile homes weatherized with Nebraska WAP funds. The MHEA Audit was approved with User Defined Measures by USDOE on June 2, 2016.

Multi-family Energy Audits

Multi-family buildings represent less than 20 percent of the housing stock in Nebraska. The U.S. Department of Energy has indicated that they will rely on the MulTEA, EA-QUIP, REM audit software, HEAT, eQUEST and TREAT audits for these larger, multi-family buildings.

When considering weatherization of a multi-family building of greater than 24 units, Subgrantees must consult the NDEE for Energy Audit and technical assistance before performing weatherization work so that required information can be submitted for USDOE review and approval of these types of weatherization projects.

Savings to Investment Ratio

A SIR of 1.0 or greater means that the expected energy savings from installing the measure is equal to or greater than the initial cost of installation.

When a SIR of 1.0 is not reached, the measure may be completed and paid for partially with WAP funds by prorating the cost based on the SIR. For example, if an energy-related measure achieves an SIR of .70, WAP funds may only be used to pay for 70 percent of the cost of that measure, and 30 percent of the cost must come from another non-WAP source of funding. **Note: Funding may not be solicited from an income-eligible homeowner. Homeowners may not contribute funds to pay the difference for a measure with an SIR of less than 1.0.**

Opting Out or Skipping Cost-effective Weatherization Measures

Completion of all measures with an SIR of 1.0 or greater is required. All energy-savings measures must be considered and ranked in order of descending SIR. **The higher the SIR, the higher the priority.**

Higher-ranking measures may not be skipped in order to complete a measure with a lower SIR. In other words, measures may not be skipped and/or clients cannot 'opt' out of a measure.

V.4.3 Final Inspection – Quality Control

Each Subgrantee is required to perform a final quality control inspection on the weatherized home completed by a Building Performance Institute, Inc. (BPI) Certified Quality Control Inspector before reporting it to the NDEE as a completed home and requesting reimbursement as required in USDOE Federal Regulations 10 CFR 440.16(g). The Quality Control Inspector must certify that work has been completed in accordance with the priority determined by the energy audit procedures required by 10 CFR 440.21.

In PY2019 Subgrantees will be required to meet USDOE WPN 15-4 Quality Work Plan requirements and to meet Quality Control Inspector (QCI) Certification requirements. In PY2019 QCI work must meet or exceed standards specified in the Nebraska Standard Work Specification Field Guide and Installation Standards. Documentation is required to be kept in each client file as evidence that a final inspection has been performed by a Certified QCI. NDEE Program Monitors review client files as part of the Subgrantee monitoring to ensure compliance with this requirement. When a unit has received a QCI by the Subgrantee agency and has been monitored by a NDEE Field Conservation Technical staff, both QCI inspection forms will be included in the client file or building file.

Subgrantee agencies operating with a combined Energy Auditor and QCI will be involved in a higher quality assurance review by NDEE above ten (10) percent of all completed units. Subgrantees operating with separate Energy Auditors and QCIs will have at least five (5) percent of all completed units reviewed. Subgrantees using one person to perform both the Energy Audit and the QCI are not allowed to utilize that person to perform weatherization work on a dwelling. Subgrantees using one person as Energy Auditor and one person as QCI can allow the Energy Auditor to perform weatherization work on a dwelling, while the QCI is not allowed to perform any weatherization work on a dwelling.

Any Subgrantees utilizing an independent privately contracted QCI will provide documentation of certification of the QCI performing the inspections on completed units and include all QCI inspection forms within the client or building files.

V.5 Weatherization Analysis of Effectiveness

The State of Nebraska is committed to providing the citizens of Nebraska with an effective weatherization program that provides quality and cost effective services. Annually since 2015 NDEE has completed a study detailing the actual energy savings and cost effectiveness of weatherization work completed in Nebraska. The study uses a pre- and post-consumption analysis of randomly selected homes proportionately selected based on population demographics in each Subgrantee region. The results of that study and its methodology continue to be used to provide program feedback regarding the effectiveness of specific weatherization measures, and to assist in identifying training needs or training effectiveness based on energy savings and reduction of energy burden to low-income households.

During the application process the Subgrantees secure a signed Client Consumption Release Form which authorizes the Subgrantees to obtain the consumption records for each household for a 12-month

period prior to weatherization (pre-consumption) and for a 12-month period after weatherization (post-consumption). The 30-year normalized client pre- and post-consumption data, based on fuel type, is used to calculate the percentage of energy consumption savings achieved. For the period of July 2016 to June 2017, consumption on 118 homes was evaluated and the data showed an average savings for natural gas at 7.49 percent and an average savings for electricity at 7.48 percent. In comparison to the USDOE National Evaluation results:

- 2008 – 18 percent for gas, and 7 percent for electricity average annual energy savings
- 2010 – 16 percent for gas, and 8 percent for electricity average annual energy savings

The PY 2017 State of Nebraska analysis shows the annual energy savings for electricity remains comparable to the National Evaluation results for 2008 and 2010. The annual energy savings for gas is lower than the National Evaluation results and consumption analyses of previous program years. The Department of Environment and Energy is planning specific trainings to discuss and respond to these reduced gas savings percentages.

Nebraska is in the process of collecting and reviewing data for July 2018 to June 2019 to continue to evaluate the annual energy savings of Subgrantees weatherization work. This monitoring activity will continue to assist the Department of Environment and Energy in evaluating program effectiveness as well as help in identifying technical training needs or the effectiveness of training during that period.

The initial consumption energy savings model study can be found at this website:

<http://www.NDEE.ne.gov/publications/PDFs/NDEEWXevaluation2016.pdf>

Other Analysis of Effectiveness

The effectiveness of Subgrantee weatherization is also assessed through program technical monitoring activities and the requirement that all dwelling units weatherized in the program have an energy audit completed to measure energy effectiveness and minimum savings to investment ratio of 1.0 or better.

Inconsistencies noted through program monitoring result in actions that increase training and monitoring requirements in an effort to put a Subgrantee on the path to continued improvement.

This year NDEE intends to work with program Subgrantees to establish and begin implementation of core competency requirements for all program personnel at both the state and Subgrantee level. Trainings will be targeted to provide personnel skills, knowledge and ability to perform weatherization program activities effectively.

NDEE will expand monitoring activities of Subgrantees to include the percentage and types of efficiencies/improvement actions required as a result of on-site inspection activities.

V.6 Health and Safety Plans

The average per dwelling expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters may not exceed \$7,541 statewide in Program Year 2019 (starting July 1, 2019), as per the U.S. Department of Energy's Weatherization Program Notice 19-1.

Historically, Nebraska has not limited H&S investment to a per-unit cost, but it has allocated between 15-20 percent of its annual allocations to cover H&S-related expenditures. In PY2019, a per dwelling unit limit for Health and Safety expenditures of \$1,500 has been established, based on historical data. Units may exceed the \$1,500 limit if approved in advance by the Nebraska Department of Environment and Energy (NDEE) on a case-by-case basis.

Please see the USDOE approved Nebraska Weatherization Field Guide and Installation Standards, Section 2 for Nebraska's WAP Health and Safety plan for Single Family Homes and Manufactured Homes. (*Links to be posted on the Department of Environment and Energy Weatherization website.*)

The Nebraska PY2019 Health and Safety Plan is a separate attachment to this document.

V.7 Program Management

V.7.1 Overview and Organization

The weatherization program is administered by NDEE, a code agency of the State of Nebraska Executive Branch. The Department of Environment and Energy is the Grantee agency for the state of Nebraska for USDOE Formula Grant funding and is a Subawardee of the Nebraska Department of Health & Human Services on USDHHS LIHEAP funding for the weatherization assistance portion of that state funding. The Department of Environment and Energy is the administrator of these two funds that are passed-through to seven (7) Community Action Agencies and one (1) non-profit agency in Nebraska. The seven (7) Community Action Agencies and one (1) non-profit agency accept applications, prioritize clients based on priority level and perform the weatherization work on dwellings.

V.7.2 Administrative Expenditure Limits

10 CFR §440.18(e) permits Subgrantees receiving less than \$350,000 in federally appropriated Low Income WAP funds to receive up to an additional 5% share of administrative funds. The Department of Environment and Energy will use this provision in the 2019 Program Year.

V.7.3 Monitoring Activities

To ensure quality workmanship throughout the State, NDEE implements a comprehensive project and program compliance monitoring strategy in compliance to USDOE's WPN-16-4: Updated WAP Monitoring Guidance. The WAP Network of Subgrantees provide access to weatherization services in each of the state's ninety-three (93) counties based on the relative need of the low-income population residing in each county and their designated service areas.

Administrative/Fiscal Compliance and Technical Monitoring Personnel

Two Technical Monitors, one Building Program Specialist, one Fiscal Compliance Analyst, and the WAP/SEP Division Chief are responsible for monitoring and evaluating the operation of the WAP program at the Subgrantee level as outlined in the State Plan.

The staff that is responsible for technical monitoring are listed by their position title and percentage of funds associated with administrative or technical monitoring by each person under this award. (This is not a percentage of all awards, such as LIHEAP and USDOE funding, but based on how it is paid as a percentage when working on monitoring activities related to this award.)

NDEE administrative/fiscal personnel:

Weatherization Division Chief: 80% administrative/20% T & TA

Fiscal Compliance Analyst: 30% administrative/70% T & TA

NDEE Technical Monitoring Personnel:

Building Program Specialist: 100% T & TA

Two (2) Energy Conservation Program Coordinators: 100% T & TA

Monitoring consists of visits by NDEE staff to Subgrantees to review program administration and compliance functions as well as onsite visits to inspect weatherized homes. NDEE Fiscal Compliance Analyst performs annual Administrative/ Fiscal Compliance Monitoring including a review of fiscal and administrative systems to assure compliance with all applicable rules and regulations. The Department of Environment and Energy’s two (2) Certified Quality Control Inspectors/Technical Monitors conduct Quality Control Inspection monitoring and technical assistance centered on monthly site visits to work sites and completed weatherized homes during several phases of project implementation.

In PY2019, Technical Monitors will continue to work with Subgrantee crews and contractors to achieve, “100 percent right, 100 percent of the time.” When it is determined that a serious problem and/or deficiency exists that is an immediate threat to the health and safety of a weatherization client, NDEE will issue an Immediate Action Directive to the Subgrantee who must take action to immediately rectify the issue. Inspection reports are sent to Subgrantees outlining all monitoring activities completed as well as recommendations, findings, and any questioned costs. Subgrantees have 30 days to respond and provide documentation that required actions were completed. The Comprehensive Monitoring Strategy includes the following monitoring and program review activities for each Subgrantee:

Nebraska Department of Environment and Energy Program Monitoring and Compliance Strategy				
Monitoring/Review Activity	Purpose	Conducted by:	# of Units	Frequency

Onsite Inspection of in-progress units	Provide technical guidance or assistance to Subgrantees on in-progress projects. Includes lead safe monitoring, training, and/or technical assistance.	(2) WAP Technical Monitors/Certified Quality Control Inspectors	10% of all units for each Subgrantee	Monthly or every other month as needed to reach targeted percentage of units per Subgrantee.
Quality Control Inspection	Quality Control Program Inspections including final diagnostic testing, or on-site monitoring of completed units submitted for reimbursement to NDEE. Includes client file review and energy audit review.	(2) WAP Technical Monitors/Certified Quality Control Inspectors	Minimum of 1 per month per Technical Monitor – 2 per month. 10% of all units for each Subgrantee.	Monthly
On-Site File Review Monitoring	Subgrantee agency office client files	(2) WAP Technical Monitors/Certified Quality Control Inspectors and Fiscal Compliance Analyst	File review for each completed project that receives an onsite inspection and during annual Program Compliance Fiscal Monitoring.	Monthly or every other month to ensure that file review is completed for every unit inspected by a WAP Technical Monitor. Annual during Program Compliance Fiscal Monitoring.
Lead Safe Weatherization	Assure that lead-safe procedures are implemented as required.	WAP Technical Monitors	n/a	At least once per quarter/per subgrantee and per crew/contractor.
Program Compliance Administrative/ Fiscal Monitoring	Comprehensive review of Subgrantee program administration including a financial review and a systems monitoring.	Fiscal Compliance Analyst	n/a	At least once annually for each Subgrantee.
Desktop Energy Audit Review	Review energy audits submitted with reimbursement requests to ensure	Building Program Specialist	10% of all completed units	Sampling from Reimbursement Requests

	<p>the appropriate audit tool is used, input values are appropriate, energy efficiency measures are identified and implemented according to SIR's for appropriate measures.</p>			
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Technical Monitoring:

NDEE implemented on February 1, 2018 a more accountable process to the Technical Monitoring reporting and follow-up procedures. NDEE Technical Monitors have started a process where after they have completed an in-progress monitoring or a QCI monitoring visit, they write-up a report to the Subgrantee identifying any findings, concerns, recommendations, commendations, or best practices, and identify any corrective actions that are required. The report will be reviewed and signed by the NDEE WAP Division Chief and sent to the Subgrantee in 30 days of the monitoring visit. The Subgrantee has 30 days to respond and resolve any corrective actions if needed. NDEE will utilize a tracking spreadsheet and use the NDEE online database to ensure all follow-up on Technical Monitoring has been completed in a timely manner.

Onsite Inspection of In-progress Units

NDEE Technical Monitors that are BPI Certified Quality Control Inspectors make site visits to in-progress weatherized units to provide technical guidance or assistance to Subgrantees and to verify compliance with program installation requirements. Some Subgrantees are monitored each month, while others are monitored more infrequently depending on production and identified needs to address quality and/or health and safety concerns. A minimum of 10 percent of weatherized homes for each Subgrantee will be completed with additional inspections completed if recurring inconsistencies are experienced.

Quality Control Inspection

NDEE Technical Monitors will complete Quality Control Inspections on units submitted for reimbursement to NDEE as per Section 3 of WPN 15-4. These inspections will include, but not be limited to diagnostic testing, client file review and energy audit review. Five (5) percent or greater of all completed units will be inspected for each Subgrantee that utilizes a separate Energy Auditor and Quality Control Inspector. Ten (10) percent or greater of all completed units will be inspected for each Subgrantee that utilizes one person to perform both the Energy Auditor and Quality Control Inspections.

File Review Monitoring

NDEE Technical Monitors complete an onsite file review for every weatherized home receiving an In-Progress or Quality Control Inspection.

Lead Safe Weatherization Site Visits

NDEE Technical Monitors make periodic unannounced site visits to homes that are being weatherized to observe that the required lead-safe work practices are being used by crews and contractors. This is an opportunity to clarify and demonstrate best practices related to lead-safe weatherization.

Desktop Energy Audit Review

NDEE Building Program Specialist reviews energy audits that are submitted on ten (10) percent of weatherized home. The audits are reviewed to ensure that the appropriate audit tool is used, input values are in accordance with program requirements (energy efficiency measures identified based on SIR's are implemented), issues and concerns discussed in Technical Working Group or issues associated with Department of Environment and Energy monitoring and being incorporated into the audit process.

Administration/Fiscal Compliance Monitoring:

NDEE believes monitoring is an extremely important aspect of weatherization program management. A successful monitoring program improves Subgrantee operations, identifies problems early enough for corrective action, and promotes quality work. The Department of Environment and Energy considers monitoring to be an assessment of Subgrantee performance in fulfilling program objectives.

An Administrative/Fiscal Compliance Monitoring will be conducted annually with each Subgrantee. Administrative/Fiscal Compliance Monitoring consists of an administrative review and a fiscal review. Prior to monitoring the Fiscal Compliance Analyst will review the Subgrantees required annual audit and previous year's Administration and Fiscal Compliance Monitoring to ensure the Subgrantee has resolved any findings from these audits and monitoring.

The financial review will include:

1. A check of the contract files against contract procedures
2. Sample journal entries
3. Inventory reconciliation
4. Cost categories
5. Administrative expenses

The program administration review will include:

1. The outreach support level and client application process
2. Reviewing client files for compliance with all federal and state WAP rules and regulations regarding mandated documentation of: household income, client certification of eligibility, owner/landlord permission for weatherization, rent declaration, fuel release statement, inspection statement, lien/debt statement, a complete Building Check & Job Order form/site-specific audit, complete material cost information, funding source designation, final quality control inspection and client release

3. Client certification and prioritization system
4. Inspection/quality control systems
5. Subcontracting system
6. Review of goals for serving elderly, disabled, and families with Children under 6 years old, high-energy use and high-energy burden
7. Review of procurement systems

A minimum of 20 client files of all USDOE and LIHEAP units completed in the time period being reviewed during the Program Compliance Administrative/Fiscal Monitoring visit will be examined. NDEE staff will review Subgrantee management systems to ensure compliance with rules, regulations, and mandated file documentation. Material records will be examined and inventory will be inspected to verify the adherence to Federal specifications. The financial review will encompass the examination of all completed programs not previously reviewed.

NDEE will issue a report within thirty (30) calendar days to the Weatherization Program Director, Agency Executive Director and the Board President detailing the monitoring findings along with recommendations for Subgrantee improvement. The Subgrantee is required to respond within thirty (30) calendar days with a corrective action plan that includes steps to be taken to address findings identified during the onsite monitoring. NDEE Program Monitors and staff will follow-up during onsite visits to ensure that the corrective actions are implemented as directed.

Administrative/Fiscal Monitoring for PY2019:

Blue Valley Community Action

April 27 – May 1, 2020

Central Nebraska Community Action Partnership

September 2 – 6, 2019

Northeast Nebraska Community Action Partner

November 25 – 29, 2019

Community Action Partnership of Lancaster and Saunders Counties

January 27 – 31, 2020

Community Action Partnership of Mid Nebraska

May 18 – 22, 2020

Northwest Community Action Partnership

October 7 – 11, 2019

Southeast Nebraska Community Action Partnership

February 24 – 28, 2020

Habitat for Humanity of Omaha

March 23 – 27, 2020

Resolution Strategy

NDEE issues administrative/fiscal compliance monitoring reports to the Subgrantee Weatherization Program Director, Agency Executive Director and the Board President detailing the monitoring findings within thirty (30) calendar days after the monitoring visit along with recommendations for Subgrantee improvement. The Subgrantee is required to respond within thirty (30) calendar days with a corrective action plan that includes steps to be taken to address findings identified during the onsite monitoring. NDEE Administrative and Fiscal Compliance Monitor and staff will follow-up during onsite visits to ensure that the corrective actions are implemented as directed.

V.7.4 Training and Technical Assistance Approach and Monitoring Activities

NDEE believes strong internal systems, oversight, training and technical assistance are essential to enable Subgrantees to achieve the objectives of the Weatherization Program. The Training and Technical Assistance budget and narrative contained in the Annual File reflects this philosophy and will insure quality weatherization work and adequate financial and programmatic management controls.

NDEE combines onsite inspections on in-progress units with an extensive training and technical assistance program. Administrative, fiscal and technical monitoring identify areas where more specific training is required to improve work quality and delivery of program services and to correct Subgrantee administrative and management problems.

Technical Assistance

WAP Technical Monitors are responsible for completing inspections and providing technical assistance activities as part of the Program Monitoring and Compliance Strategy. Technical assistance provided may include but is not limited to: staff training, policy interpretation, State Plan and Field Guide & Installation Standards clarification, working with Subgrantees to address deficiencies and training Subgrantees on new and existing weatherization techniques.

NDEE Staff Training

Training is essential for staff development and is provided on an ongoing basis to upgrade the quality of service delivered by the WAP Technical Monitors. Each monitor is expected to research and attend training opportunities offered through the Nebraska WAP Training Network, which will enable them to gain additional knowledge and skills in: weatherization technology, furnace technology and diagnostic equipment.

Lead Safe Weatherization Training

Lead safe weatherization training will be offered through the Nebraska WAP Training Network during the 2019 Program Year. NDEE will continue to ensure that WAP Network staff and crews receive training and ongoing technical assistance regarding Lead-Safe Weatherization work practices through the WAP Training Network and through monthly site visits to observe Lead Safe Weatherization practices of crews and contractors.

State Technical Working Group

Technical staff personnel from each Subgrantee will attend quarterly Technical Working Group meetings with Department of Environment and Energy technical staff to discuss technical issues, specific problems, innovative solutions, and program direction. The Technical Working Group will continue to meet on a quarterly basis in PY2019, and will communicate regularly on an as needed basis through email or by conference call.

Nebraska’s WAP Training Network

In PY2019 NDEE will contract with Laborers International Union of North America Local #1140 (LIUNA) located in Omaha, NE an IREC Accredited Training site for Retrofit Installer/Technician (RIT) and Crew Chief training, to ensure a continuation of our established training network strategy, and assuring training availability throughout the State employing the WAP Standardized Curriculum aligned with the National Worker Certification Job Task Analysis (JTA), supplemented with a series of in-depth topical trainings identified as needed during the Program Year. LIUNA will provide Comprehensive Training in the areas of Installer Fundamentals, Installer Intermediate and Crew Chief.

As a result of previous years training opportunities, the Nebraska WAP network at this time has a Certified Quality Control Inspector at each CAP and the non-profit agency in Nebraska and the majority of CAPs have an experienced Energy Auditor (some BPI Certified) on staff. Any additional required Energy Auditor and Quality Control Inspector training will be outsourced where the Nebraska WAP network can receive quality training and testing by an IREC Accredited Program with BPI Certified Trainers and Testers where Certification in these areas can be provided. The low demand for the Energy Auditor and Quality Control Inspector training in Nebraska makes it more feasible to outsource this training at this time and allow LIUNA to focus on training opportunities specifically associated with the Installer Fundamentals, Installer Intermediate and Crew Chief JTAs utilizing LIUNA’s training facility.

In PY2019, Nebraska WAP Subgrantee staff will prioritize USDOE T & TA funds for training and certification requirements.

Subgrantee technical staff: Comprehensive Training by an IREC Accredited Program will be delivered at the LIUNA site in Omaha, Nebraska. The delivery of Comprehensive Training, based on the amount of funds allocated for training and technical assistance activities from the USDOE, it is anticipated that the schedule will be as follows:

Comprehensive Training	
Class	Anticipated Class Date
Installer Fundamentals	1 st Quarter: July – September 2019
Installer Intermediate	2 nd Quarter: October – December 2019
Crew Chief	3 rd Quarter: January – March 2020
Installer Fundamentals	4 th Quarter: April – June 2020
Energy Auditor	Outsourced per CAPs - as needed basis
Quality Control Inspector	Outsourced per CAPs - as needed basis

IREC accredited training has been provided at the Omaha, NE site by Santa Fe Community College, a USDOE and IREC approved and accredited organization. However, some Subgrantee and NDEE staff members have utilized other out-of-state accredited trainers due to training schedule conflicts. . In PY2019 NDEE will continue to provide training at the Omaha facility as needed through training contracts with SFCC or other IREC Accredited/BPI Trained Programs from out of state as needed.

Subgrantee technical staff: Specific Training will continue to be delivered through the LIUNA site-based center in Omaha, Nebraska or other facilities based on training type and needs. The delivery of Specific Training, based on the amount of funds allocated for training and technical assistance activities from the USDOE, will be scheduled as needed and may include, but not be limited to, the following:

Anticipated Specific Trainings
Lead Safe Weatherization
Mobile Home Weatherization
CAZ Testing
Mold and Moisture Assessment and Evaluation
ASHRAE 62.2
Blower door guided air sealing
Installing and testing dense pack insulation
HVAC inspection and testing
Conference Trainings (for CEUs)

In the case of both Comprehensive and Specific Training, opportunities will be available for a fee to individuals and organizations that are not members of the Nebraska WAP Network.

Grantee Training Plan Feedback

The training schedule discussed above reflects the guidelines established in Section 4 of WPN 15-4 regarding Comprehensive training requirements. Additionally, through the Specific section of the training plan, specific training needs will be addressed as identified during inspections and monitoring completed by NDEE Technical Monitors, the Building Program Specialist, Fiscal Compliance Analyst, WAP Division Chief and USDOE Project Officers and Quality Assurances Reviewers.

Grantee Maintaining Workforce Training and Credentials

NDEE has maintained spreadsheets that track all attendees of trainings that have been provided through the Nebraska WAP network since 2010. An additional spreadsheet has been developed to track all Nebraska WAP network staff members who have received BPI Certification in any of the four Home Energy Professional Certifications.

NDEE communicates quarterly with Subgrantees regarding their staff training needs, certification updates and possible new hire training requirements.

NDEE staff will continue to update both the training and certification spreadsheets and make modifications that will assist in tracking initial certifications, training, certification maintenance and continuing education requirements.

Grantee Mandatory Trainings

Subgrantee technical staff training will be provided by NDEE through the trainings indicated in the Comprehensive and Specific plans shown above. Additional technical staff training will be provided through attendance at quarterly Technical Working Group meetings discussing technical issues, specific problems being encountered and innovative solutions. A minimum of one technical staff member per Subgrantee will be required to attend the Technical Working Group meetings. Non-compliance in attending a mandatory meeting could result in NDEE withholding funds until the Subgrantee can show an adequate understanding of the materials presented in the missed training.

Subgrantee management and fiscal staff have been provided specific training on the Federal Uniform Administrative Requirement (2 CFR Part 200) on cost principles and audit requirements. Supplemental training that will assist them in administrative and fiscal compliance related to the USDOE WAP will also be considered acceptable costs for T & TA funds.

Subgrantee Staff Certification or Training Requirements

In PY 2019, the Nebraska WAP requires:

- Each Subgrantee to have on staff at least one BPI Certified Quality Control Inspector or a contractor with the required QCI Certifications. Subgrantees replacing or hiring new QCI staff must be certified or have the knowledge, skills and abilities to meet the JTA requirements and to secure their certification within six months of their hire date.
- All existing technical staff must be RRP Certified. Subgrantees replacing or hiring new technical staff must be certified or have the knowledge, skills and abilities to secure their certification within two months of their hire date.
- All existing technical staff must have been trained, or in the case of new hires be trained, in the appropriate training covering the Home Energy Professional Certifications, as developed by BPI, that most closely represents their job duties. Replacement or new hires must receive their training within six months of their hire date.

NDEE Industry Wide Initiatives and Future Program Requirements

NDEE Training and Technical Assistance plan reflects the current QCI WAP initiative while looking forward to implementing future program requirements that will allow Nebraska's WAP network to meet all four of the BPI Home Energy Professional Certifications. During PY2019 and beyond, the Nebraska WAP will make all training opportunities available, for a fee, to individuals and organizations that are not members of the Nebraska WAP Network.

Effectiveness and Energy Saving Comparisons to Assist in T&TA Activity Development

In PY2017 (July 1, 2017 to June 30, 2018) NDEE evaluated the energy and energy cost savings achieved over 12 months on weatherized homes and its impact on client's energy burden. Initial evaluations were completed on a sampling of homes weatherized by each of the Subgrantees, taking into account home ownership, building type, heating fuel type and geographic location. The results are being used by NDEE in their prioritization and development of T&TA activities, and the development of future Specific training options for Nebraska WAP technical staff. NDEE completed a training session in the October 2018 Technical Working Group utilizing the statewide and per agency energy savings results from the initial evaluation.

NDEE is also utilizing the evaluation results to provide NDEE and Subgrantees with valuable information regarding the effectiveness of specific program work and the overall impact of their work within the low-income community. In PY2019 NDEE will proceed with evaluating over a 100 home sample of Subgrantees completed homes using the same evaluation tool to compare PY2018 (July 1, 2018 to June 30, 2019) energy and energy cost savings to PY2017 evaluation data. NDEE will also use results for comparison with previous program year evaluations.

Administrative Requirements to Ensure Effective Program Administration and Implementation

- NDEE Technical Monitors and Building Program Specialist will attend weatherization industry conferences, trainings and workshops to meet QCI re-certification requirements and acquiring a minimum of 10 CEUs per year. Information attained as part of those trainings will be shared with members of the Nebraska WAP through various training activities such as the quarterly Technical Working Group meetings and onsite inspections.
- NDEE and Subgrantee management and fiscal staff will attend industry related conferences, trainings, workshops and grant management webinars to increase their knowledge, skills and abilities in grant administration. An example would be continued participation in training and webinars that address grant administration, such as the NASCSP Annual Conference.

Grantee Health and Safety Plan Training Activities

The Specific section of the training plan includes trainings specifically associated with execution of the NDEE Health and Safety Plan including; Lead Safe Weatherization, Combustion Appliance Zone (CAZ) Testing, Mold and Moisture Assessment and Evaluation, and ASHRAE 62.2 Ventilation Requirements. Additional Health and Safety Plan training activities will be addressed as identified during the inspection and monitoring of units.

Approach to Client Education

The educational component has been designed to enhance program participants' understanding of home energy efficiency improvements, to increase energy savings, and to contribute to the ongoing effectiveness of installed weatherization measures. Educational materials have been prepared by NDEE and training provided to our Subgrantees. The USDOE will continue to require WAP Subgrantees to provide client education to each WAP client. Subgrantees will be required to provide (at a minimum) educational materials in verbal and written format.

Subgrantee Training and Technical Assistance

Each Subgrantee will receive an allocation of T & TA funds to help offset the cost of their Comprehensive and Specific training while attending trainings or to provide trainings for their weatherization staff.

V.8 Energy Crisis and Disaster Plan

Nebraska will not use any grant funds for energy crisis relief during the 2019 Program Year.